

# **APPENDIX F**

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## Environmental Impact Report

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# Notice of Preparation



# CITY OF INGLEWOOD

## ECONOMIC AND COMMUNITY DEVELOPMENT DEPARTMENT

### Planning Division



Christopher E. Jackson, Sr.  
Director

Mindy Wilcox, AICP  
Planning Manager

**September 10, 2020**

### REVISED NOTICE OF PREPARATION

**PROJECT NAME:** Inglewood Transit Connector Project

**STATE CLEARINGHOUSE NO.:** 2018071034

**DUE DATE FOR PUBLIC COMMENTS:** October 12, 2020 by close of business.

**SUMMARY:** The Inglewood Transit Connector Project (proposed Project) is a proposed Automated People Mover (APM) mass-transit line connecting the City of Inglewood (City) to the greater southern California region. The proposed Project will include a revised 1.6-mile transit guideway, three stations, APM trains, and support facilities including a maintenance storage facility (MSF) and two traction power substations (TPSSs). The City, as the Lead Agency, prepared an Initial Study (Original IS), which was published in July 2018 (SCH 2018071034).

The Original IS determined that an Environmental Impact Report (EIR) would be prepared in compliance with CEQA to assess for potentially significant impacts that may result from the proposed Project. A Notice of Preparation (Original NOP) was circulated, and comments were received from the public and agencies following a 30-day comment period that ended on August 15, 2018.

As a result of the comments received, in addition to refinements and modifications to the proposed Project identified in the Original NOP and Original IS, this Revised NOP and IS are being re-circulated. Subsequent to the circulation of the Original IS, the State of California Office of Planning and Research (OPR) updated and revised the thresholds contained in the State CEQA Guidelines Appendix G. The Revised IS has been updated to address the updated Appendix G checklist that became effective on December 28, 2018.

The proposed Project includes transit improvements that would be constructed in the City along the same route and alignment as noted in the Original NOP and Original IS. The elevated guideway would be located primarily within the public right-of-way from the intersection of Market Street and Florence Avenue intersection, along Market Street to Manchester Boulevard, then to Prairie Avenue. The portions of the elevated guideway not within the public right-of-way occur at the location of Market Street/Florence Avenue Station where the elevated guideway leaves the right-of-way and enters into an existing commercial center northeast of the intersection of Market Street and Regent Street. The existing uses would be demolished.

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The proposed Project begins with a pedestrian walkway that connects to the Metro Crenshaw/LAX Line across Florence Avenue in downtown Inglewood to the Market Street/Florence Avenue Station, which will be located at an existing commercial plaza. The proposed Project's elevated guideway begins at the Market Street/Florence Station, then proceeds southwest to Market Street, where it turns south onto the existing right-of-way along Market Street. The elevated guideway alignment continues on Market Street until the intersection with Manchester Boulevard, where it turns east onto Manchester Boulevard until the intersection with Prairie Avenue. At this point, the elevated guideway alignment turns south onto Prairie Avenue and continues south on Prairie Avenue until the intersection of Prairie Avenue and Hardy Street, where it terminates with the Prairie Avenue/Hardy Street Station.

The proposed Project would also include a maintenance and storage facility (MSF) that would store and maintain the trains and two traction power substations (TPSSs). The proposed MSF would be constructed adjacent to the right-of-way at the proposed MSF site, south of the corner of Hillcrest Boulevard and Manchester Boulevard, which is currently occupied by a commercial center and gas station; this site would also include one of the proposed TPSS sites. The second TPSS site would be located at the City's proposed Intermodal Transportation Facility (ITF) located on Prairie Avenue south of Arbor Vitae Street; this TPSS site would be to the east of Prairie Avenue, outside of the right-of-way within the ITF site. The existing uses would be demolished. Anticipated construction duration for the proposed Project is 4 to 5 years.

The Revised NOP and Revised IS reflect the following refinements and modifications that have been made to the proposed Project:

- Changes to proposed Project's from an approximately 1.8-mile long alignment with 5 stations to an approximately 1.6-mile long alignment with 3 stations. The revised alignment follows the same route as the original alignment from Market Street and Florence Avenue to Manchester Boulevard to Prairie Avenue terminating at the intersection of Prairie Avenue and Hardy Street.
- Refinements and modifications to the proposed stations as follows:
  - Modify the proposed Project to reduce the total number of stations from the five stations previously considered to the three stations.
  - The new locations for the three stations are located at:
    - Market Street/Florence Avenue Station: at an existing commercial plaza on the southeast corner of the intersection of Market Street and Florence Avenue between Market Street and Locust Street;
    - Prairie Avenue/Arbor Vitae Street Station: at the intersection of Prairie Avenue and Pincay Drive; and
    - Prairie Avenue/Hardy Street Station: at the intersection of Prairie Avenue and Hardy Street.
  - A pedestrian bridge linkage has been added to connect the Market Street/Florence Avenue Station with the Metro Crenshaw line on the northside of Florence Avenue.
- Removal of the Intermodal Transportation Facilities as part of the proposed Project. The City is proceeding with that project separately.
- Reduce the potential number of traction power substations from three to two. One will be co-located with the MSF facility and one will be located on the City's ITF site on Prairie Avenue.

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This Revised NOP and Revised IS are being recirculated as a result of these Project refinements.

**PROJECT LOCATION:**

The proposed Project is located entirely in the central portion of the City, east of the San Diego Freeway (I-405) and north of the Glen Anderson Freeway (I-105) in Los Angeles County, California (see **Figure 1: Regional Location Map**).

The proposed Project is generally bounded by Florence Avenue to the north; Hardy Street to the south; the Los Angeles Sports and Entertainment District (LASED) to the east; and La Brea Avenue to the west (see **Figure 2: Project Vicinity Map**).

The proposed Project begins with a pedestrian walkway that connects to the Metro Crenshaw/LAX Line across Florence Avenue in downtown Inglewood to the Market Street/Florence Avenue Station, which will be located at an existing commercial plaza. The proposed Project's elevated guideway begins at the Market Street/Florence Station, then proceeds from the intersection of Market Street and Florence Avenue adjacent to the Metro Crenshaw/LAX Line in Downtown Inglewood, south through Market Street, then east onto Manchester Boulevard, turning south on Prairie Avenue until its intersection with Hardy Street.

The elevated guideway will be located within the public rights-of-way along Market Street, Manchester Boulevard, and Prairie Avenue; with the exception of the Market Street/Florence Avenue Station, which will be located on a site that currently includes existing commercial use northeast of the intersection of Market Street and Regent Street, and the proposed MSF that will be located on a site that currently has commercial uses south of the intersection of Manchester Boulevard and Hillcrest Boulevard outside of the right-of-way (see **Figure 3: Typical Automated People Mover**). Construction staging is anticipated to be contained within the footprint and easements of the proposed Project, at sites that will be demolished (for other uses including the commercial Plaza at Regent Avenue and Market Streets, the commercial office building at 150 S. Market Street, and the commercial plaza at 500 E. Manchester Boulevard).

**DUE DATE FOR PUBLIC COMMENTS:** October 12, 2020 by close of business.

Notice is hereby given that the City will prepare an EIR for the proposed Project as revised and described in this Revised NOP and the Revised IS. The EIR to be prepared by the City will evaluate the potential significant environmental effects of the proposed Project. The City is requesting comments related to the proposed Project as revised.

Due to refinements and modifications to the proposed Project following the release of the Original NOP and Original IS, this Revised NOP and Revised IS have been prepared to inform the public of the changes to the proposed Project. The City is providing this Revised NOP and accompanying Revised IS to the Governor's Office of Planning and Research (OPR), any trustee or responsible agencies identified for the Project, to adjacent cities and counties, all entities who submitted comments on the Original NOP and Original IS, and to those entities requesting such notice regarding the proposed Project.

The Draft EIR will analyze the potential adverse impacts that are anticipated to result from the proposed Project as discussed herein; identify potential mitigation measures that may be considered as reasonable and feasible; and analyze a reasonable range of alternatives to the proposed Project that could reduce or

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avoid potential significant impacts that could result from the construction or operation of the proposed Project while still feasibly achieving the Project's objectives.

The City encourages all parties to provide information regarding potentially significant environmental issues, mitigation measures, and reasonable alternatives to be included in the EIR. Any agency submitting comments on this Revised NOP and Revised IS shall also indicate if that agency would be a responsible agency, or a trustee agency for the proposed Project in accordance with CEQA Guidelines Section 15082(b).

A copy of the Revised Initial Study prepared for the proposed Project is available for review at the City of Inglewood website at: <https://www.cityofinglewood.org/1016/Environmental-Documents>; and at the locations listed below:

- Inglewood City Hall, First Floor Lobby, One W. Manchester Blvd., Inglewood, CA 90301

### **PROJECT DESCRIPTION**

The proposed Project would include an automated people mover (APM) to transport riders to and from the regional Metro Rail system (Crenshaw Line) to Downtown Inglewood, the Forum, the LASED, which includes the new NFL stadium scheduled to open in the Fall of 2020, and the future Inglewood Basketball and Entertainment Center (IBEC). The proposed Project would consist of elevated dual guideways to allow for continuous APM trains to travel in each direction. The proposed Project is planned to have a ridership capacity of 11,500 passengers per hour. Additionally, the transit system presents an opportunity for integration with local economic activity, transit-oriented development, and other initiatives in the area.

The proposed Project will include support facilities to provide for maintenance, storage and system power requirements that would be located adjacent to the elevated guideway but outside the street rights-of-way. These facilities include an approximately 78,000 square feet (SF) maintenance and storage facility (MSF) to provide for maintenance activities and train storage, and two traction power substations (TPSS) facilities to provide electrical power for system operation. The location of the proposed Project's guideway, stations, and the support facilities are shown on **Figure 2**.

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:** As described more fully in the Revised Initial Study, the Draft Environmental Impact Report will consider: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use and Planning, Noise and Vibration, Population, Employment and Housing, Transportation and Circulation, Tribal Cultural Resources, and Utilities and Service Systems impacts.

Agricultural and Forestry Resources, Hydrology and Water Quality, Mineral Resources, Public Services, Recreation, and Wildfire impacts have been determined to have less than significant impacts on the environment through the analysis in the Revised Initial Study and are not proposed for further analysis in the EIR.

**REQUESTED PERMITS/APPROVALS:** The City of Inglewood has principal responsibility for approving and carrying out the proposed Project. Approvals required for implementation of the proposed Project may include, but are not limited to, the following:

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***State and Regional Agency Approval and Actions:***

- South Coast Air Quality Management District (SCAQMD)—permit to operate a generator and Dust Control Plan;
- Regional Water Quality Control Board (RWQCB)—administer regulations regarding water quality. Permits or approvals required from the WQCB may include but are not limited to: (1) General Construction Stormwater Permit; (2) Standard Urban Stormwater Mitigation Plan; and (3) Submittal of a Recycled Water Report for the use of recycled water as a dust control measure for construction; and
- California State Transportation Agency (CalSTA)—oversight and consistency with grants funding from the Transit and Intercity Rail Capital Program (TIRCP).

***City of Inglewood Approvals and Actions:***

- Certification of the Final EIR for the Inglewood Transit Connector Project;
- Updates/amendments to the City of Inglewood General Plan and municipal code. These changes relate to conforming the plans, as necessary, to reflect the physical improvements within the Inglewood Transit Connector Project and technical amendments necessary for the construction, operation and maintenance of the Inglewood Transit Connector;
- Preparation of a Project-specific Stormwater Management Plan or Standard Urban Stormwater Mitigation Plan for approval;
- County of Los Angeles (as the City's contractor) Fire Department approval;
- Grading permits, building permits, haul route approval, and other permits issued by the Department of Building and Safety for the Project and any associated Department of Public Works permits for infrastructure improvements;
- Tree removal permits;
- Noise permit for Construction and Building Hours extension;
- Tract/parcel map and zone change approvals;
- Eminent Domain approvals for acquisition of parcels outside of the City's right-of-way;
- Approvals for federal, State, or local financing plans or grants;
- Approving contracts for the design and construction of the Project; and,
- Other federal, State, or local approvals, permits, or actions that may be deemed necessary for the Project.

Other agencies, such as the County of Los Angeles and the Los Angeles County Metropolitan Transportation Authority (Metro), may have approval authority or involvement depending on the financing used to construct the proposed Project.

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**COMMENTS ON THE REVISED NOTICE OF PREPARATION AND INITIAL STUDY:** The City welcomes all comments regarding the scope and content of environmental issues to be addressed in the EIR.

**All comments will be considered in the preparation of the EIR. Written comments must be submitted to this office by 5 p.m. on October 12, 2020.**

Responses should be submitted sent to Ms. Mindy Wilcox, AICP, Planning Manager, at the following email and address:

City of Inglewood  
Planning Division  
One W. Manchester Boulevard, 4th Floor  
Inglewood, CA 90301  
[inglewoodtransitconnector@cityofinglewood.org](mailto:inglewoodtransitconnector@cityofinglewood.org)

The City welcomes your participation in the environmental review process.



MINDY WILCOX, AICP, Planning Manager

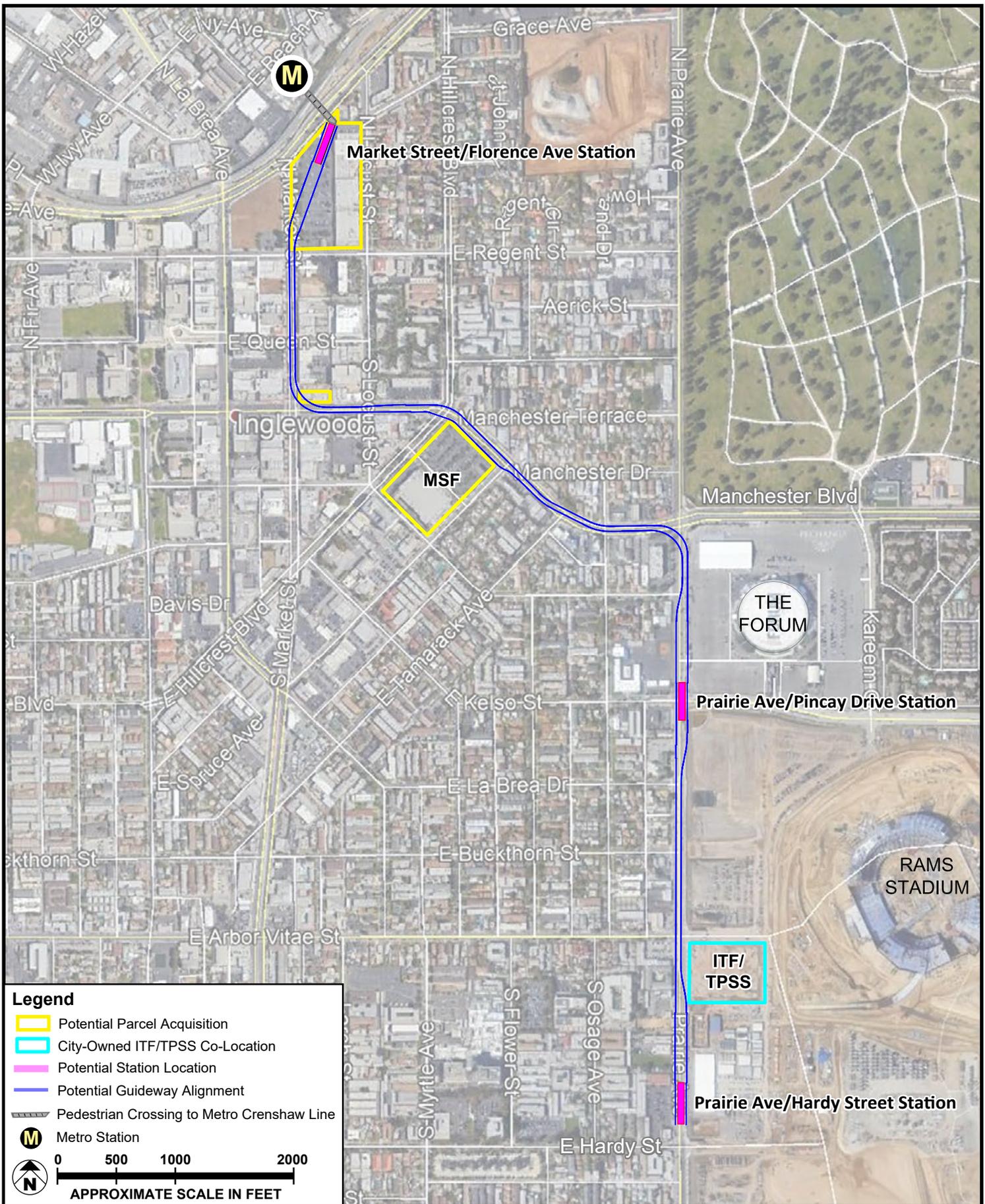
Enclosures:

**Figure 1: Regional Location Map**

**Figure 2: Project Vicinity Map**

**Figure 3: Typical Automated People Mover**





SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

FIGURE 2



# Project Vicinity Map

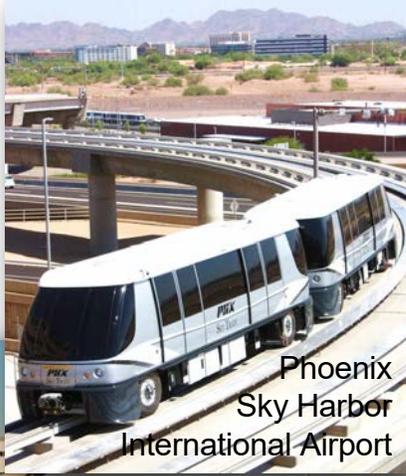
Las Vegas  
Monorail



BART, Oakland  
International  
Airport



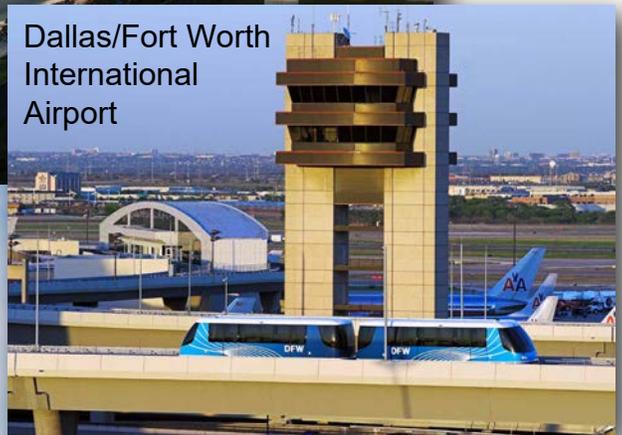
Phoenix  
Sky Harbor  
International Airport



Miami International Airport



Dallas/Fort Worth  
International  
Airport



JFK International Airport



SOURCE: LAX Landside Access Modernization Program - 2015

FIGURE 3

# Typical Automated People Mover



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Recirculated Draft EIR

# Inglewood Transit Connector Project



## Draft Environmental Impact Report

November 2021

State Clearinghouse No. 2018071034

Lead Agency: City of Inglewood, Economic and Community Development, Planning Division  
One West Manchester Boulevard, 4th Floor, Inglewood CA 90301



**Meridian**  
Consultants

## *Recirculated* Draft Environmental Impact Report for the Inglewood Transit Connector Project

Prepared for:

City of Inglewood  
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November 2021

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## 1.0 EXECUTIVE SUMMARY

This document is the Recirculated Draft Environmental Impact Report (Recirculated Draft EIR) for the Inglewood Transit Connector (ITC) Project (proposed Project). This Recirculated Draft EIR has been prepared by the City of Inglewood (City or Inglewood) as the lead agency for the environmental review of this proposed Project in conformance with the California Environmental Quality Act (CEQA).

### 1.1 SCOPING AND PUBLIC OUTREACH

The City, as the Lead Agency, prepared a Notice of Preparation (Original NOP) and an Initial Study (Original IS), which were published on July 16, 2018 (SCH 2018071034), identifying the environmental topics that could have potential significant impacts from the construction and operation of the proposed Project. The Original IS determined that an Environmental Impact Report (EIR) would be prepared in compliance with the CEQA to assess potentially significant impacts that may result from the proposed Project. Comments were received from the public and agencies during a 30-day comment period for the Original NOP that ended on August 15, 2018.

As a result of the comments received and in response to refinements and modifications to the proposed Project identified in the Original NOP and Original IS, a Revised NOP and IS were revised to provide an additional opportunity for comment on the potential environmental effects of the from September 10, 2020, to October 12, 2020. Subsequent to the circulation of the Original IS, the State of California Office of Planning and Research (OPR) updated and revised the thresholds contained in the State CEQA Guidelines Appendix G. The Revised IS was updated to address the updated Appendix G checklist that became effective on December 28, 2018. See **Appendix A: Revised NOP and IS** and **Appendix B: Summary of Comments on Second Recirculated NOP**.

The Revised NOP and Revised IS reflected changing the project from an approximately 1.8-mile long alignment with 5 stations to an approximately 1.6-mile long alignment with 3 stations. The revised alignment followed the same route as the original alignment from Market Street and Florence Avenue to Manchester Boulevard to Prairie Avenue terminating at the intersection of Prairie Avenue and Hardy Street.

A Draft EIR for the proposed Project was released on December 23, 2020, for a 47-day public review and comment period, ending on February 8, 2021. A robust public outreach effort was conducted over the two-year period starting in 2018 through the close of the public comment period on the Draft EIR. This effort included over 35 community and stakeholder outreach meetings with a variety of stakeholders including local Inglewood block clubs, neighborhood watch groups and homeownership associations (HOA) such as the Renaissance HOA, Carlton Square HOA, Briarwood HOA, Regent Street HOA, and the

Hyde Park Village HOA. The City also engaged the NCAAP Inglewood Chapter, Inglewood Airport Area Chamber of Commerce, Rotary Club of Inglewood, Inglewood Unified School District, local churches, and community-based nonprofits including the Social Justice Learning Center Institute, Move LA, The Enrichment Center, and the Coalition for Clean Air.

After the close of the public comment period on the Draft EIR, the City continued to keep elected officials, community leaders and the general public informed of the status of the environmental review and approval process for the proposed Project. The outreach program has been focused on increasing project awareness and education, disseminating project information, soliciting public input, and supporting the technical and legal environmental processes. To learn more about the local community's needs for the proposed Project, the City held over 100 community and stakeholder outreach meetings over the past 3.5 years during the planning, environmental and design process. The City further revised the design of the proposed to reflect the input received.

In response to the public and stakeholder input received, since the release of the Draft EIR, the design of the proposed Project has changed. In particular, the Maintenance and Storage Facility (MSF) for the Automated Transit System (ATS) has modified to allow the Vons grocery store currently located on the proposed MSF site to remain on this site in a new building to continue to serve the community. Other modifications to the Project include the realignment of the proposed ATS alignment on Prairie Avenue to the west side of the street to allow for single column alignment and allow the street to be open to the sky, as well as the relocation of one of the proposed stations to the southwest corner of Prairie Avenue and Manchester Boulevard. Although the modifications to the proposed Project reduce, rather than increase, the Project's potential for significant environmental effects, the City has decided to prepare and circulate this Recirculated Draft EIR to analyze the effects of the proposed Project as revised.

It should also be noted that, as discussed in **Section 2.0: Introduction**, the proposed Project is statutorily exempt from CEQA compliance under Public Resources Code section 21080, subdivision (b)(12), which provides that CEQA does not apply to "[f]acility extensions not to exceed four miles in length which are required for the transfer of passengers from or to exclusive public mass transit guideway or busway public transit services." (See also State CEQA Guidelines, § 15275(b).) The Project meets this definition. Therefore, the City's preparation of the Recirculated Draft EIR is not required by CEQA. The City has nevertheless voluntarily prepared this Recirculated Draft EIR to provide a comprehensive environmental analysis of the proposed Project and to solicit public and agency input on the proposed Projects, its potentially significant environmental effects, and mitigation measures and/or alternatives to reduce or avoid any such effects. Following the completion of CEQA review, the City of Inglewood City Council will consider whether to approve the Project. Although not required to do so, if the City Council decides to approve the Project, the City Council will certify the Final EIR and adopt CEQA Findings of Fact and, if

necessary, a Statement of Overriding of Considerations for the Project. If the Project is approved, the City will also file a CEQA Notice of Determination (NOD) and a CEQA Notice of Exemption (NOE) for the Project.

## 1.2 SUMMARY OF THE PROPOSED PROJECT

### 1.2.1 Project Overview

The City proposes the Inglewood Transit Connector Project (ITC or proposed Project) to extend service from the Metro K (Crenshaw/LASX) Line to the City's activity centers. The ITC is a 1.6-mile, three station, fully elevated, electrically powered Automated Transit System (ATS system) that will connect directly to the Metro K Line Downtown Inglewood Station. The City proposes the ITC Project to address projected future congestion, improve overall mobility and levels of service, and advance its sustainability goals. Providing transit access to the City's activity centers would advance local and regional goals to increase transportation choice, significantly reduce greenhouse gas (GHG) emissions, improve air quality and human health, reduce per-capita vehicle miles traveled (VMT), reduce the growth of congestion on local and regional roads, and encourage sustainable development patterns.

In March 2021, the Board of Directors of the Los Angeles County Metropolitan Transportation Authority (Metro) approved and voted to form a Joint Powers Authority (JPA) with the City of Inglewood to help extend mass transit from the Metro K line at the Metro K Line Downtown Inglewood Station to the City's sports and entertainment areas, and to help lend its partnership and expertise to assist with the design, construction and financing, and operation and maintenance of this 1.6-mile ATS system to extend service from the K Line. Metro recognizes the increase in ridership on the K line that will be created by the proposed ITC Project and is working collaboratively with the City on all aspects of the project to extend service from the K line to the City's major employment, housing, commercial and entertainment centers.

If the City approves the proposed Project, the JPA would contract with a public private partner and select a design/build/finance/operate/maintain (DBFOM) contractor to complete the proposed Project. With the DBFOM approach, which is also being used by the Los Angeles World Airport (LAWA) for the LAX Landside Access Modernization Program (LAMP), the responsibilities for designing, building, financing, operating, and maintaining the Project are bundled together and transferred to private sector partners. In this structure, the City will enter into an agreement with a private sector party to finalize the design, build, finance, operate, and maintain the ATS system.

As currently proposed, the ATS system will have three stations including: Market Street/Florence Avenue Station, Prairie Avenue/Manchester Boulevard Station, and Prairie Avenue/Hardy Street Station. Station design capacity would be established by pedestrian demand volumes under typical peak conditions, in addition to increased demand during special events, service disruptions, and emergency evacuation

situations. Stations would provide pedestrian access to the elevated ATS from existing sidewalk and pedestrian travel areas adjacent to the station locations. Final station locations and configurations will be determined during the design and procurement process.

Existing infrastructure along the Project alignment may need to be relocated or reconfigured to accommodate new elevated transit 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.

The proposed Project is described in detail in **Section 3.0: Project Description** of this Recirculated Draft EIR.

### 1.2.2 Background

The City is undergoing a transformation into a world-class sports and entertainment destination and a major employment center within the greater Los Angeles region. First, in 2012, over \$100 million was invested in the Forum, making it one of the largest indoor concert venues and host of some of the largest entertainment acts in the country. Next, the redevelopment of approximately 298 acres at Hollywood Park includes thousands of new residential units and millions of SF of commercial and recreational uses as part of the Los Angeles Stadium and Entertainment District (LASED) project. At the centerpiece of the LASED is the new \$5 billion-dollar, 70,240-seat SoFi Stadium shared by the Los Angeles Rams and Los Angeles Chargers. SoFi Stadium will host Super Bowl LVI in Winter 2022, and the 2028 Summer Olympic Games with the possibility of hosting many more events. In August 2020, the City approved the Inglewood Basketball and Entertainment Center (IBEC), which will be home to the Los Angeles Clippers of the National Basketball Association (NBA) and includes the team's arena, headquarters, and training facilities. There are other exciting developments in the City including housing, office, retail commercial and hotel projects under construction and in the application pipeline. Additionally, the new Los Angeles Philharmonic music and cultural campus for the Youth Orchestra Los Angeles (YOLA) facility, designed by architect Frank Gehry near Inglewood City Hall opened in September 2021.

Pivotal to the City's transformation is the new 8.5-mile Metro K Line. Scheduled to begin service in 2022, the Metro K Line will enhance transit access to the City and include stations at Aviation/Century, Westchester/Veterans, Downtown Inglewood, Fairview Heights, Hyde Park, Leimert Park, MLK Jr., and Expo/Crenshaw. It will extend light-rail transit from the existing Metro E (Expo) Line station at Crenshaw/Exposition Boulevards to the Metro C (Green) Line station at Aviation/Century Boulevards and provide a transit connection to Los Angeles International Airport (LAX) via the City of Los Angeles' automated people mover. Upon completion of the Metro K Line, patrons who wish to use the Metro rail system to travel to events at the Forum, LASED including SoFi Stadium, the IBEC, or other existing and

1.0 Executive Summary

future commercial areas and residences in the City would face a “last-mile” gap of approximately 1.5 to 2 miles between the Metro K Line and the City’s new activity centers. This gap is longer than a convenient walking distance for patrons traveling to the City’s activity centers.

As Inglewood transforms into a major regional housing, employment and activity center, the number of vehicular trips associated with new jobs, retail, entertainment, and residential opportunities is anticipated to increase. Based on historic traffic counts, traffic volumes have been increasing at the rate of 1.5 percent per year, and many key intersections and highway corridors already experience congestion. According to the Southern California Association of Government’s (SCAG) *Connect SoCal - 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Demographics and Growth Forecast*, substantial socioeconomic and demographic growth is projected in the region. The City is projected to be one of the highest growing housing and employment centers in Los Angeles County.

1.2.3 Project Location

The proposed Project is located in the central and northern portions of the City of Inglewood east of the San Diego Freeway (I-405) and north of the Glen Anderson Freeway (I-105) in Los Angeles County, California (see **Figure ES-1: Project Regional Location Map**).

The ITC will be constructed in an area generally bounded by the Metro K Line to the north; Hardy Street to the south; the NFL stadium and the Forum to the east; and La Brea Avenue to the west (see **Figure ES-2: City of Inglewood**). The Project extends from the Metro K Line Downtown Inglewood station southwest to the intersection of Market Street and Regent Street, continues south on Market Street, east on Manchester Boulevard, and south on Prairie Avenue to Hardy Street (see **Figure ES-3: Project Vicinity Map**). The ATS will be largely located within the public rights-of-way for the streets and sidewalk areas along Market Street, Manchester Boulevard, and the west side of Prairie Avenue (See **Figure ES-4: Location of Alternative Alignments in the LPA Report**). The entire Project is situated within the City of Inglewood, an incorporated city within Los Angeles County.

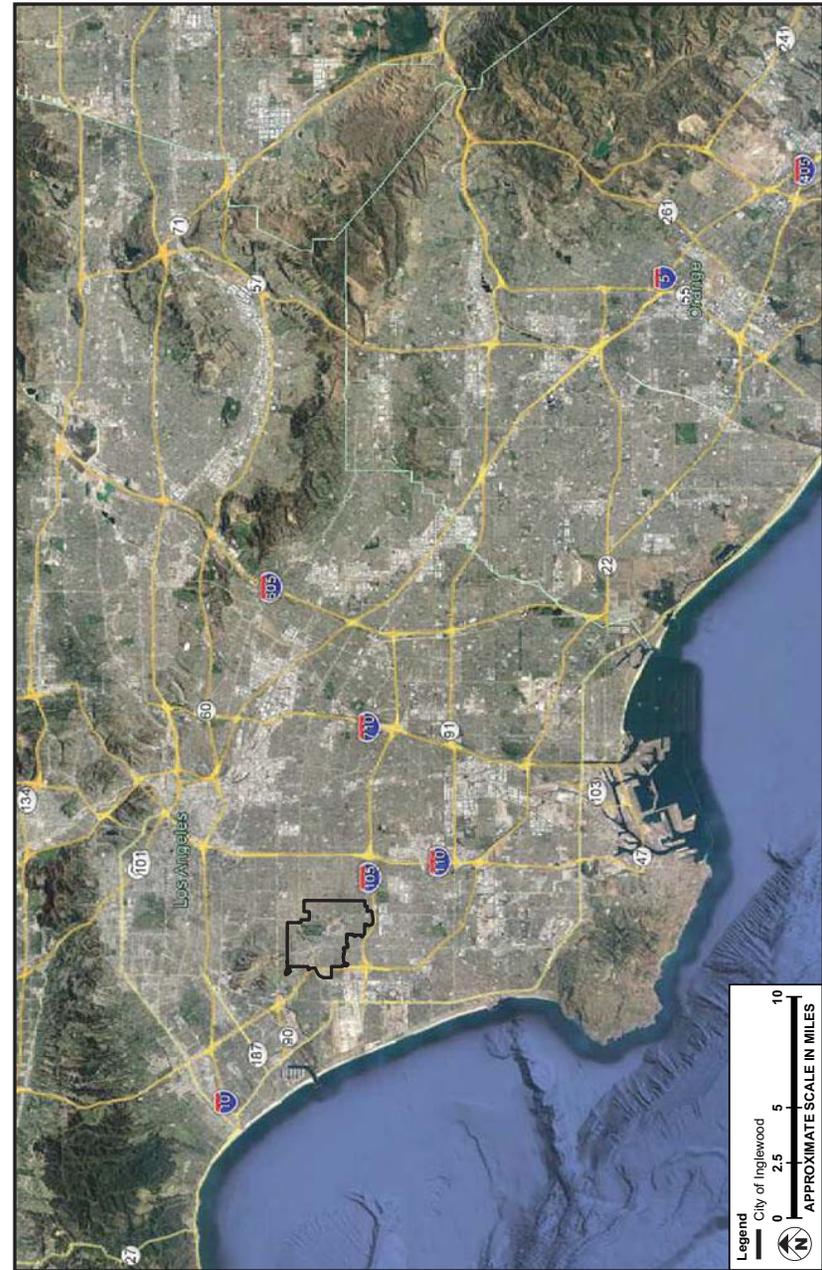


FIGURE ES-1

Project Regional Location Map



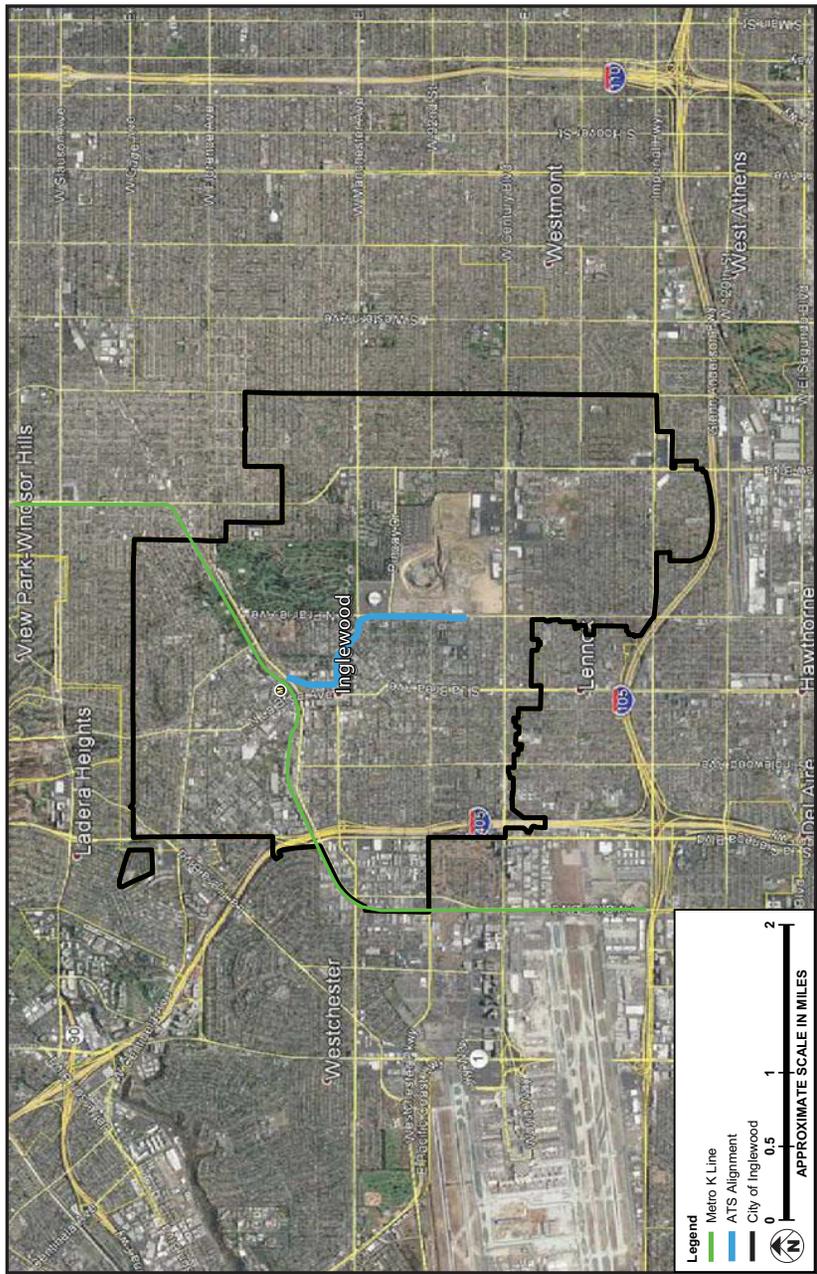
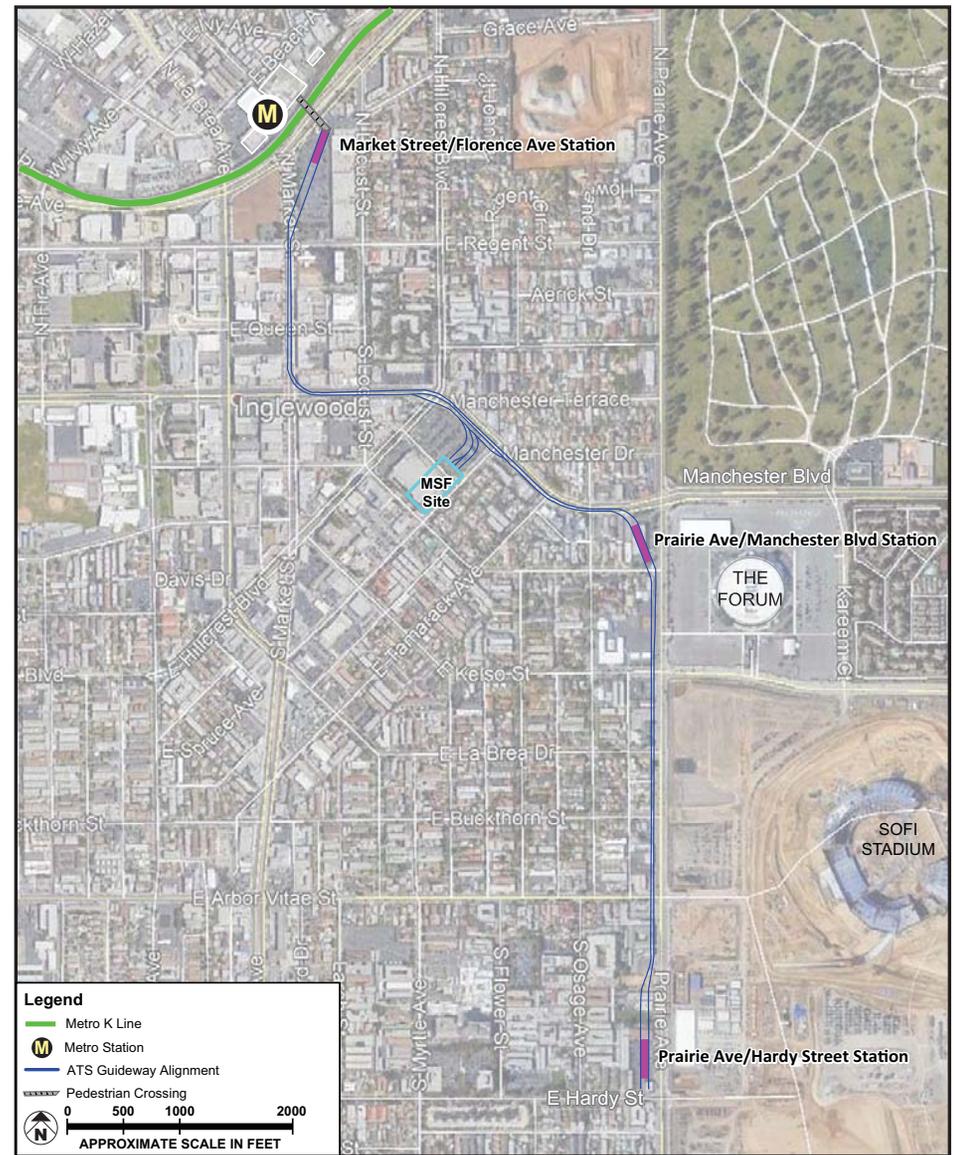


FIGURE ES-2

City of Inglewood



251-003-20



Illustrative and subject to adjustments as part of finalization during final design

FIGURE ES-3

Project Vicinity Map



251-003-20



FIGURE ES-4  
 Location of Alternative Alignments in the LPA Report

SOURCE: City of Inglewood - 2018; Meridian Consultants - 2021



201-003-20

### 1.2.4 Project Objectives

Section 15124(b) of the State CEQA Guidelines states that the Project Description shall contain “[a] statement of the objectives sought by the proposed project.” In addition, Section 15124(b) of the State CEQA Guidelines further states, “[t]he statement of objectives should include the underlying purpose of the project.”

The City’s goals and objectives for the Inglewood Transit Connector Project are as follows:

- Provide direct and convenient connection to the Metro regional transit system for local residents and the region to access the City’s new major employment, commercial, and activity centers;
- Close the “last mile gap” to the regional transit system by providing passengers with the ability to transfer to or from destinations and the Metro K Line.
- Provide sufficient transit connection capacity between the Metro regional transit system and the City’s new major activity centers with enhanced travel time certainty and sufficient capacity to meet peak ridership demands to encourage transit as a travel mode choice;
- Maintain existing roadway capacity;
- Reduce the City’s traffic congestion and alleviate growing demand on the existing roadway network on both major arterials and residential streets for both nonevent and event days;
- Encourage intermodal transportation systems by providing convenient, reliable time-certain transit;
- Increase transit mode split, reduce vehicle trips, and reduce per-capita vehicle miles traveled to the City’s major activity centers, with corresponding improvement in air quality, public health, and reductions in greenhouse gas emissions from transportation sources in accordance with the City’s goals, the SCAG 2020-2045 RTP/SCS and State policies with respect to climate change and land use;
- Support the ongoing economic revitalization, growth opportunities for transit-oriented development (TOD) within the Downtown TOD Plan area, including commercial and residential uses, including through the creation of public parking facilities;
- Encourage redevelopment and investment within the City in areas served by the proposed Project;
- Provide safe, reliable, and convenient access to businesses in the City so that they are accessible to their workforce and customers;
- Connect the Inglewood community and citizens to jobs, education, services, and destinations within the City and within the region by providing transit within safe and accessible walking distances; and
- Support regional efforts to become more efficient, economically strong, equitable, and sustainable.

The ITC Project reflects the City’s commitment to providing adequate transportation connections to its current and proposed major housing, employment, and activity centers, and to address the critical first/last mile gap with a fixed-guideway transit connector.

### 1.2.5 Construction Commitment Program

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

- Business Community and Support Program
- Business Interruption 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 will establish a Project Task Force for the ITC Project that will develop a Construction Staging and Traffic Control Plan that will address the following topics: review worksite traffic control plans and other traffic management plans developed by the Project contractor(s) for the Project to ensure these plans 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 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.

All haul routes and activities will 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, shall 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 in this Program require the use of construction equipment that generates the least amount of noise, use of temporary noise barriers, and restrictions on the use of heavy equipment that create vibration near sensitive uses and buildings. Contact information for a Community Affairs Liaison will be posted throughout the construction area. This liaison shall 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 will be prepared and implemented during construction.

All lighting needed to support construction activities will be required to meet defined standards to avoid impacts to adjacent uses and all stockpile area will be required to be in the least visible areas as approved by the City.

Removal of trees and other landscaping will be minimized and any trees removed will be replaced within 6 months of work being completed in affected areas.

The Construction Commitment Program also includes business and community support programs to address businesses financially affected by construction of the 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).

### 1.0 Executive Summary

- Funding for temporary signage during construction to help businesses that are partially blocked or that have inconvenient access due to construction activity.

The City will also create a \$5 million dollar Business Assistance Fund (BAF) to provide financial assistance through grants to eligible businesses affected by construction of the Project.

### 1.2.5 Project Characteristics

The proposed Project includes the following components:

- ATS trains operating on an elevated dual-lane guideway with three stations;
- ATS guideway along Prairie Avenue to be constructed on the west side of Prairie Avenue;
- No more than three straddle bents north of Pincay Street along Prairie Avenue immediately south of the Prairie Avenue/Manchester Boulevard Station;
- Passenger walkway systems connecting the stations to the street, mezzanine areas, escalators, and elevators;
- Storage space, operations space, communications systems located within stations;
- Wayfinding signage and amenities;
- An MSF to provide regular and preventive maintenance of the ATS trains and equipment, as well as space for storage of the vehicle fleet and the operations control center, among other functions;
- Power Distribution System (PDS) substations located on the MSF and the Prairie Avenue/Hardy Street station sites to provide traction/propulsion power, auxiliary power, and housekeeping power;
- Utilities infrastructure—new, modified and/or relocated—to support the proposed Project;
- Surface public parking lots located at Market Street/Florence Avenue and Prairie Avenue/Hardy Street stations containing multimodal pick-up and drop-off areas, and at 150 S. Market Street to support Downtown Inglewood; and
- Roadway, traffic devices, and streetscape modifications and improvements to accommodate the guideway alignment and support structures.
- Land acquisitions, acquisitions of air rights, easements and encroachment rights, subdivision of parcels, and/or other reconfigurations of parcels, dedications, vacations and/or temporary closures of public rights-of-way, as necessary.

### 1.3 SUMMARY OF ENVIRONMENTAL IMPACTS

Based on the September 2020 Revised Initial Study, the City determined that preparation of an EIR was required to further evaluate potentially significant impacts of the Project related to the following environmental topics: Aesthetics, Air Quality, Biology Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use and Planning, Noise and Vibration, Population, Employment, and Housing, Transportation, Tribal Cultural Resources, and Utilities and Service Systems.

### 1.0 Executive Summary

Impacts related to Agricultural and Forestry Resources, Hydrology and Water Quality, Mineral Resources, Public Services, Recreation, and Wildfire and the Initial Study Mandatory Findings of Significance were determined to be less than significant in the Revised Initial Study. These conclusions remain valid with respect to the revised proposed Project and these environmental topics are not evaluated further in this Recirculated Draft EIR.

**Table 1.0-4: Summary of Findings** included at the end of this section presents a summary of findings for each of the resources analyzed in this Recirculated Draft EIR for the proposed Project. A summary of impacts for each resource category is presented below. Detailed analysis is included in **Section 4.0: Environmental Impact Analysis**.

### 1.3.1 Aesthetics

#### Existing Conditions

The proposed Project is located entirely within the City, approximately 5.5 miles east of the Pacific Ocean, within a broad coastal plain surrounded by rising land to the south and north, and more-level terrain extending east. The City is a highly developed urban area containing moderately dense development along major corridors that consist of commercial, residential, and industrial uses. Street corridors in the City provide the only long-range views available in the City, including limited views of Baldwin Hills to the north and other urban areas in and surrounding the City. Overall, the views within and surrounding the City are consistent with the views of a highly developed urban area.

No designated or otherwise identified scenic views or vistas are located within or visible from the City.<sup>1</sup> The City's General Plan states that no forest resources, wildlife, fisheries, shorelines, or agricultural land are present in the City,<sup>2</sup> nor does the General Plan designate any scenic vistas within the City or its vicinity. Further, there are no designated or eligible State scenic highways within or adjacent to the Project area.<sup>3</sup> The nearest State scenic highway is Interstate 110 between mile post 25.7 and 31.9, which is located north of downtown Los Angeles and south of Interstate 210 in Pasadena. The closest portion of this scenic highway is approximately ten miles northeast of the Project boundary.

Additionally, the Project area is not near any designated wild or scenic rivers pursuant to the National Wild and Scenic Rivers System.<sup>4</sup> The nearest mountains, the Santa Monica Mountains, are more than 10

<sup>1</sup> Google Earth, 2020.

<sup>2</sup> City of Inglewood General Plan, "Conservation Element" (1997), 1.

<sup>3</sup> California Department of Transportation, California Scenic Highway Mapping System, Los Angeles County, [http://www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/), accessed August 2018.

<sup>4</sup> US Fish and Wildlife Service, *National Wild and Scenic Rivers System*, available at <https://www.rivers.gov/>, accessed August 31, 2018.

miles north of the Project boundary. No views of these mountains or of any other focal points or broad panoramic view corridors are available from public rights-of-way along the proposed alignment.

### **Visual Impacts**

Overall, the ATS structure, including the stations, guideway, MSF, and support facilities, would complement the existing surrounding visual environment by using transparent and neutral tones as part of its design character. The design would be in the modernist style to enhance the aesthetically pleasing quality of the structure. To prevent unsightly views and defacing of the structure, the exterior material would be anti-graffiti and anti-vandalism. The final design of the stations would also reflect its surroundings in Downtown Inglewood along Market Street and the new developments on Prairie Avenue.

Visual impacts associated with construction of the proposed Project would be less than significant with the implementation of measures from the CCP (see **Appendix D**). These CCP measures provide measures to minimize the visual impact of temporary lighting and of visually obtrusive erosion control devices and stockpile and staging areas. Construction activities at each segment and overall would be temporary in nature and visual impacts would be alleviated once the construction is completed.

The design of the ATS guideway would allow the continued expression of the buildings identified as historic resources along Market Street in Downtown Inglewood. The design of the ATS guideway would allow the continued expression of the buildings identified as historic resources. The height of the ATS guideway, the distance of the guideway from the edge of the buildings and the size and spacing of the support columns have been designed in a manner that maintains important aspects of the existing setting for the historic resources located along the proposed alignment and ensures that the overall scale, massing, composition, and design of these historic buildings would remain readily visible despite some interruption of views. The ability of the buildings to convey their historic significance would not be substantially impaired by the proposed Project as required by the CCP. Therefore, indirect impacts to identified historic resources would be less than significant.

The proposed Project would be generally consistent with the existing zoning and planning regulations governing scenic quality. The proposed Project would be designed to be complementary with the visual character defined in the City's Downtown TOD Plan and the Hollywood Park Specific Plan (HPSP) for areas located adjacent to the proposed alignment to the extent feasible and consistent with the ITC Design Standards and Guidelines (Design Guidelines). An amendment to General Plan Policy 2.3, Preservation of Historic Fabric, is proposed as part of the Project to ensure the incorporation and implemented of the ATS system into the historic fabric of the Inglewood historic core. This amendment would be consistent with the goals of the General Plan.

Additionally, light and glare impacts during construction and operation would be less than significant with the incorporation of lighting design standards in the CCP and Design Guidelines, respectively.

### **1.3.2 Air Quality**

#### **Emissions Thresholds**

During operation, the proposed Project would generate emissions from various sources including employee trips, deliveries, area sources, energy sources (natural gas), and motor vehicles. However, operation of the proposed Project would reduce emissions from motor vehicles when compared to future conditions without the proposed Project. As such, due to the reduction in motor vehicle emissions and elimination of existing sources, the proposed Project would result in net negative emissions. Moreover, during normal operation the proposed Project would not exceed the South Coast Air Quality Management District (SCAQMD) operational thresholds.

Construction of the proposed Project has the potential to temporarily emit air pollutants through the use of heavy-duty construction equipment, through vehicle trips generated from workers and haul trucks traveling to and from the proposed Project area, from demolition and various soil-handling activities, and from the use of diesel powered on-and off-road vehicles and equipment. In addition, fugitive dust emissions would be generated. With implementation of the Air Quality Program of the CCP and the mitigation measures recommended in this Recirculated Draft EIR, however, construction-related daily emissions would not exceed the SCAQMD significance threshold for any criteria pollutant.

#### **Exposure to Pollutants**

The analysis in the Recirculated Draft EIR evaluated the exposure of people to a range of specific pollutants, including carbon monoxide (CO) and Nitrogen dioxide (NO<sub>2</sub>), both of which can contribute to breathing disorders and compromised lung function. In all cases, the concentrations of these pollutants with mitigation, even when combined with existing ambient concentrations and the effects of increased activity in the vicinity from future off-site projects, are below the State and federal health-based thresholds. In addition, concentrations of small particulate matter would be less than the allowable incremental increase thresholds established by the SCAQMD.

The analysis also examined the potential for sensitive receptors (residents, workers, school children, and day-care children) in the Project vicinity to be exposed to toxic air contaminants which are known to cause health risks, including cancer. The analyses concluded that, after mitigation, exposures to contaminants that would increase cancer or non-carcinogenic risks would be below the established thresholds.

### 1.3.3 Biological Resources

The proposed Project is located within a highly developed and urbanized area and potential biological resources are limited to a few small parks. Sensitive animal and plant species and vegetation communities identified in the California Natural Diversity Database as having the potential to occur within a 0.25 mile radius of either side of the proposed Project guideway, stations, and support facility sites are largely absent. Biological resources that would be affected by development of the proposed Project are limited to trees located along the Project alignment and within the property proposed for acquisition as part of the Project. None of the trees potentially affected are native or considered to be rare, endangered, or sensitive species, but 502 trees are protected under the City of Inglewood Tree Protection Ordinance (Inglewood Municipal Code Chapter 12, Article 32), and these or others could serve as nesting habitat for migratory or other protected bird species. The removal of these trees could create impacts, especially if the trees are removed during the bird nesting season. These impacts would be mitigated to a less-than-significant level through the conduct of preconstruction surveys prior to any nesting season tree removal, protection of trees with active nest sites during construction, through obtaining necessary City permits to remove existing trees, and through protection or replacement of removed trees at a 1:1 ratio minimum as determined by the City. All trees removed to accommodate the Project will be replaced in accordance with the City's Tree Protection Ordinance. No permanent impacts to trees located along the alignment would, therefore, result from the Project.

### 1.3.4 Cultural Resources

#### *Historic Resources*

The Project area is located in a part of Inglewood known to contain historic-age buildings, which includes ten identified historical resources.<sup>5</sup> Minimum visual clearances, including the height of the guideway, the distance of the guideway from the edge of the building, and the size and spacing of the vertical supporting columns, would be incorporated into Project design as required by the Design Guidelines. The overall scale, massing, composition, and design of the historic-age buildings located along the ATS alignment will remain readily discernable despite some intermittent obscuring of physical features from some views. Thus, there will be no significant impacts to historical resources as a result of the Project.

#### *Archaeological Resources*

The cultural resource records search and field visit conducted did not result in identifying any prehistoric or historical archaeological resources within the Project study area.<sup>6</sup> Further, the built nature of the area

<sup>5</sup> Historical Resources Technical Report. Inglewood Transit Connector. October 4, 2021.

<sup>6</sup> See **Appendix K.1** of this Draft EIR.

indicates a high degree of disturbance suggesting the likelihood of encountering intact archaeological deposits near the surface of the Project area to be very low. Implementation of mitigation measures would reduce the potential impacts to archaeological resources to a less-than-significant level.

#### *Human Remains*

Implementation of mitigation measures would reduce the potential impacts to human remains to a less-than-significant level. The measures would require the contractor to hire a qualified monitor on-site to monitor any ground disturbing activities and monitors would be versed in locating and identifying human remains.

### 1.3.5 Energy Resources

Operation of the proposed Project would reduce annual VMTs under all scenarios and would therefore reduce annual petroleum consumption. Specifically, under the Adjusted Baseline scenario, the proposed Project would reduce annual fuel consumption from approximately 45.3 million gallons to 44.8 million gallons, a decrease of approximately 584,300 gallons. Under the Future (2027) Non-Event scenario, the proposed Project would reduce annual fuel consumption from approximately 47.1 million gallons to 46.5 million gallons, a decrease of approximately 622,600 gallons. Under the Future (2027) All Event scenario, the proposed Project would reduce annual fuel consumption from approximately 50.9 million gallons to 49.5 million gallons, a decrease of approximately 1.4 million gallons. Under the Future (2045) Non-Event scenario, the proposed Project would reduce annual fuel consumption from approximately 43.8 million gallons to 43.2 million gallons, a decrease of approximately 580,950 gallons. Under the Future (2045) All Event scenario, the proposed Project would reduce annual fuel consumption from approximately 47.0 million gallons to 45.6 million gallons, a decrease of approximately 1.4 million gallons.

During construction, the proposed Project would generate a demand for 165,115 kWh of electricity and up to 163.7 million gallons of petroleum each year. Electricity for operation of the proposed ATS system would be provided via two power distribution system substations (PDSs). One of the PDSs would be located on the MSF site. The second PDS substation would be located on the Prairie Avenue/Hardy Street station site. The electricity demand for the proposed Project during normal operation would be 27.1 million kWh (27.1 GWh) per year.<sup>7</sup>

Because the proposed Project would support statewide efforts to improve transportation efficiency, comply with the CALGreen building code, and comply with other State and local plans and policies, the

<sup>7</sup> Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021.

energy consumption from the proposed Project would not be wasteful, inefficient, or unnecessary, and would impacts would be less than significant.

### 1.3.6 Geology and Soils

The proposed Project would be constructed consistent with the requirements of the California Building Code. The Project study area is in a relatively level area with soils made up of artificial fill overlying native alluvial and older alluvial deposits, liquefaction zone area, or within areas designated as having the potential for seismically induced landslides and is not located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed Project. The Project alignment is located in an area that contains potentially active faults, including the Townsite, Centinela Creek, Cemetery Fault, and Manchester Faults. The Townsite fault may intersect the Project alignment, stations, and near the MSF. Although the Townsite, Centinela Creek, Cemetery, and Manchester faults are not presently mapped as Alquist-Priolo Earthquake Zoning Act (APEFZ) faults, or situated within a delineated APEFZ, their location within the active Newport-Inglewood fault zone and proximity to the Project alignment suggests these faults should be considered active with the potential for fault rupture and impacts would be potentially significant. Designing the Project in conformance with the 2019 CBC,<sup>8</sup> Caltrans guidance, and applicable seismic design criteria identified in mitigation measures would reduce potential impacts to less than significant.

The Potrero Fault lies approximately one-quarter mile to the east of the project study area; however, compliance with the California Building Code would avoid the creation of seismic hazards. Construction of the proposed Project would involve substantial grading and excavation that could leave soils exposed for periods of time and susceptible to erosion. This potential impact would be reduced through the preparation of a Stormwater Pollution Prevention Plan (SWPPP), which would describe best management practices (BMPs) to ensure the proposed Project would not result in substantial erosion or loss of topsoil.

As mentioned previously, the Project alignment is known to be underlain by artificial fill atop undisturbed alluvial soils and geological formations in which Ice Age fossils have been found within several miles of the Project alignment and that are considered paleontologically sensitive. Thus, it is possible that previously unknown buried paleontological resources within the Project alignment could be impacted during construction. To reduce potential impacts to less than significant, a qualified paleontologist would be required to develop a program for monitoring of certain ground disturbing activities, and for handling of paleontological materials if discovered.

<sup>8</sup> 2019 California Building Standards Code (Cal. Code Regs., Title 24) published July 1, 2019.

### 1.3.7 Greenhouse Gas Emissions

By providing a new transit option in the City, the proposed Project will reduce VMTs and GHG emissions generated by vehicular travel. Specifically, annual MTCO<sub>2</sub>e would be reduced by 5,503 metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e) when compared to the Adjusted Baseline without proposed Project, 11,315 MTCO<sub>2</sub>e when compared to the 2027 opening year without proposed Project, and 11,455 MTCO<sub>2</sub>e when compared to the 2045 future year without proposed Project. The proposed Project would be consistent with State and local plans and policies to achieve Statewide goals for GHG reduction, including Governor's Executive Order S-3-05, the California Air Resources Board 2017 Scoping Plan, SCAG's 2020-2045 RTP/SCS, and the City's Energy and Climate Action Plan.

Construction of the Project is estimated to generate approximately 8,820 MTCO<sub>2</sub>e. Given the five-year construction period, the annual construction GHG emissions for the proposed Project would be 2,205 MTCO<sub>2</sub>e. Operational emissions were estimated for the anticipated start of operations in late 2027 and a milestone year of 2045. Due to advances in technology and regulations to reduce GHG emissions operational emissions would continue to decline by 2056, and thereafter. The normal operation of the proposed Project would generate 3,672 MTCO<sub>2</sub>e per year from the operation of the MSF, stations, and other facilities. Each PDS substation will be equipped with backup power generators which are estimated to generate 311 MTCO<sub>2</sub>e per year, bringing the total GHG emissions from operations to 3,983 MTCO<sub>2</sub>e per year.

### 1.3.8 Hazards and Hazardous Materials

Based on searches of environmental database and collection of on-site soil and soil gas samples, the proposed Project is located in an area that includes historic land uses that used or stored hazardous materials.

Operation of the Project would include the use and storage of hazardous materials typical of those used in an industrial setting and would comply with federal, State, and local regulations governing the handling of any hazardous materials, and applicable regulatory requirements to responding to accidental release of such hazardous maintenance materials. Operation of the proposed Project would not interfere or impair with the City's ability to increase public awareness or make any improvements to emergency services and warning systems. With adherence to the federal, State, and local safety requirements, the proposed Project would not conflict with the requirements of an emergency response plan or emergency evacuation plan and impacts from operation of the Project would be less than significant.

Soil sampling confirms the potential for encountering contaminants of concern that could result in adverse health effects if not handled appropriately during construction. In addition, structures within the ATS

guideway footprint that would be demolished prior to construction of the proposed Project could contain hazardous building materials that would require appropriate identification, handling, and disposal. The potential exposure of construction workers or nearby residents and workers to these existing hazards would be reduced to a less-than-significant level through compliance with existing State and federal laws and regulations, and through implementation of plans addressing the handling of any hazardous materials encountered during construction that would be required as part of the CCP prior to the start of construction.

### 1.3.9 Land Use and Planning

Analysis of the potential for the proposed Project to physically divide the existing community and conflict with applicable land use plans, policies, and regulations was conducted. The ITC guideway and support system would primarily be contained within the existing public right-of-way of Market Street, Manchester Boulevard, and Prairie Avenue with the MSF, stations, and other support facilities, including public parking, located on adjacent properties to be acquired as part of the proposed Project. The ATS guideway, stations, and associated facilities would not physically divide the community, nor disrupt existing patterns of traffic connecting different parts of the community. While the proposed Project infrastructure would be constructed over existing streets, these streets would be reconfigured to maintain the same number of lanes as currently exist.

The proposed Project includes amendments to the City's General Plan and the HPSP and the proposed adoption of the Transportation Corridor Overlay Zone to reflect the integration of the ITC Project into the area and into the City's circulation system. The proposed Project is generally consistent with the City's General Plan, the New Downtown and Fairview Heights Transit Oriented Development (TOD) Plan and Design Guidelines, and the HPSP. The proposed Project is also consistent with the goals or transportation planning in the SCAG 2020-2045 Regional Transportation Plan/Sustainable Community Plan as the Project will reduce VMT in the City and region. The proposed Project would not conflict with goals, objectives, or policies adopted for the purpose of mitigating environmental impacts.

### 1.3.10 Noise and Vibration

#### Noise

##### Operation

The ITC Project is designed to meet the City's goals and objectives related to the reducing the City's traffic congestion and alleviate growing demand on the existing roadway network by encouraging and providing the use of intermodal transportation systems. The proposed Project is intended to reduce vehicle trips and roadway noise levels. Under all operational scenarios, the roadway conditions with implementation

of the proposed Project would not exceed the threshold of significance of an increase in noise level of 3 A-weighted decibel (dBA) equivalent continuous sound (Leq) to or within the "normally unacceptable" or "clearly unacceptable" land use compatibility categories or result in an increase of 5 dBA or greater at the sensitive land use when it would exceed 65 dBA day-night average sound level (DNL) or community noise equivalent level (CNEL).

The proposed Project would either utilize large, automated monorail technologies or rubber-tire vehicles operating along a fixed guideway. Operational noise level increases during the daytime would range from no change at the majority of the identified receptors listed below to a high of 2.1 dBA Leq (Lday) at the residential uses along Spruce Ave across from the MSF. Taking into account the ambient environment, exterior noise levels during the daytime period within this area would be 70.1 dBA. Increases in daytime noise levels would not exceed the 3 dBA Leq to or within the "normally unacceptable" or "clearly unacceptable" land use compatibility categories or result in an increase of 10 dBA or greater when noise levels remain within acceptable limits. Additionally, nighttime noise level increases would range from no change at the majority of the identified receptors listed below to a high of 3.9 dBA Leq (Lnight) at the residential uses along Spruce Ave across from the MSF. Taking into account the ambient environment, exterior noise levels during the nighttime period would be 62.4 dBA. Although nighttime noise levels would increase by more than 3 dBA Leq, nighttime noise levels would not result in an exterior environment that exceeds the "normally unacceptable" or "clearly unacceptable" land use compatibility categories or result in an increase of 10 dBA or greater when noise levels remain within acceptable limits.

The MSF will be designed in accordance with the Design Guidelines which address the massing, façade, materials, colors, roof, and lighting for this facility, how the MSF will engage with the pedestrian and vehicular circulation around it, and sustainability features. Building elements would include screens to shield all exterior equipment including equipment at the rooftop and ground level, so that it is not visible from the street or accessible areas of adjacent properties. Additionally, as described previously, implementation of **PDF NOISE-1** would require stationary noise source generated from mechanical equipment in the MSF to be enclosed within a shed or barrier that would further reduce noise levels.

Noise impacts from operation of the proposed Project would be less than significant.

##### Construction

Construction noise impacts due to construction activities were determined by comparing the calculated construction-related noise levels of the proposed Project to the measured existing ambient noise levels (i.e., noise levels without construction noise from the proposed Project). Construction noise levels were calculated for each phase of construction (Phases 1 through 8) at the adjacent land uses. **PDF NOISE-1** includes implementation of a Construction Noise Control Plan which proactively addresses the potential

effects of noise during construction. The measures required by the Construction Noise Control Plan can reduce noise levels by 10 dBA or more. For example, optimal muffler systems would reduce construction noise levels by 10 dBA or more.<sup>9</sup> Temporary abatement techniques such as the use of a noise barrier can achieve a 5-dBA noise level reduction when it is tall enough to break the line-of-sight to the receiver. Modifications such as dampening of metal surfaces or the redesign of a particular piece of equipment can achieve noise reduction of up to 5 dBA.<sup>10</sup> Moving stationary equipment away from sensitive receptors will reduce noise levels at the receptor as every doubling of distance will reduce noise by 4 to 6 dBA. Thus, with implementation of **PDF NOISE-1**, construction noise will not increase ambient noise levels by more than 10 dBA. Furthermore, 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. With implementation of **PDF NOISE-1**, construction noise levels during all phases would be less than significant.

A variety of heavy trucks will travel to and from the proposed Project during various phases of construction. As compared to adjusted baseline average daily traffic volumes along West Century Boulevard, Manchester Boulevard, South Prairie Avenue and Florence Avenue the sound power generated by the maximum anticipated number of construction trucks would not be equivalent or greater to a doubling of both the minimum and maximum ADT along these segments and therefore would not result in a 5 dBA (Leq-1hour) increase along those roadways.

## 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 ground-borne vibration. Jointed rail, worn rail, and wheel impacts at special track work can all cause substantial increases in ground-borne vibration. It is rare for ground-borne vibration to be a problem with elevated railways except when guideway supports are located within 50 feet of buildings.<sup>11</sup> For rubber-tired ATS trains, the smoothness of the roadway/guideway is the critical factor; if the surface is smooth, vibration problems are unlikely.

<sup>9</sup> FHWA, *Special Report—Measurement, Prediction, and Mitigation*, updated June 2017, [https://www.fhwa.dot.gov/Environment/noise/construction\\_noise/special\\_report/hcn04.cfm](https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm), Accessed January 2021.

<sup>10</sup> FHWA, *Special Report—Measurement, Prediction, and Mitigation*, updated June 2017, accessed July 2019, [https://www.fhwa.dot.gov/Environment/noise/construction\\_noise/special\\_report/hcn04.cfm](https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm).

<sup>11</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018, accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf)

The vibration sensitive land uses 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. Based on the adjusted vibration level curve, the estimated ground-borne vibration levels would be approximately 67 VdB for monorail trains (rapid transit or light rail vehicles) and 64 VdB for rubber-tired ATS trains. Consequently, the maximum vibration level of the uses along the guideway would be below the FTA recommended maximum acceptable level threshold of 72 VdB.

### Construction

Estimated vibration levels from construction activities would exceed the building damage significance threshold of 0.2 PPV inches per second (ips), and the human annoyance significance threshold of 72 PPV ips at several locations in the vicinity of the proposed Project. Implementation of **PDF NOISE-2** 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. The Construction Vibration Reduction Plan would require continuous monitoring and collection of vibration data to verify vibration levels are below the warning level PPV. In the event the regulatory levels of PPV are triggered, construction activities would halt to visually inspect sensitive buildings for damage. **PDF NOISE-2** also requires vibration-generating equipment to be located at specified distances from adjacent noise receptors. More specifically, to limit the risk of potential structural and building damage, **PDF NOISE-2** would 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. **PDF NOISE-2** would limit the number of jackhammers operating simultaneously to one (1) piece operating within 45 feet of off-site sensitive receptors. Implementation of these construction management practices would limit the potential for impacts from construction vibration to result in building damage with adjusted distance of construction equipment. Impacts would be less than significant and below the significance threshold for building damage of 0.2 PPV IPS with implementation of **PDF NOISE-2**.

In addition to on-site construction activities, construction delivery/haul trucks would generate ground-borne vibration as they travel along the proposed Project's anticipated off-site truck travel routes. Based on FTA data,<sup>12</sup> the vibration generated by a typical heavy-duty truck would be approximately 63 VdB (0.00566 PPV) at a distance of 50 feet from the truck. Existing buildings along the proposed Project's anticipated off-site truck travel routes (Florence Avenue, Manchester Boulevard, Prairie Avenue, and Century Boulevard) that are situated approximately 35 feet from the truck travel pathway would be exposed to ground-borne vibration levels of approximately 0.01 PPV. This forecasted vibration level would

<sup>12</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, FTA Report No. 0123, September 2018, accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf)

be below the most stringent building damage criteria of 0.12 PPV.<sup>13</sup> Therefore, vibration impacts with respect to building damage from off-site construction truck travel on public roadways would be less than significant. In addition, vibration sensitive uses (e.g., residential, hotel uses) are located along Florence Avenue, Manchester Boulevard, Prairie Avenue, and Century Boulevard. Ground-borne vibration levels generated by proposed Project off-site construction truck travel would be below the FTA 72 VdB significance threshold,<sup>14</sup> as these uses are located more than 25 feet from the truck travel pathway. Therefore, vibration impacts with respect to human annoyance from off-site construction truck travel would be less than significant for the vibration sensitive land uses located along these roadways.

### 1.3.11 Transportation and Circulation

The assessment of transportation and circulation system impacts considers the existing traffic conditions, including existing street system, public transit service, and bicycle facilities, which may be affected by the ITC Project. The transportation analysis evaluated seventy-five (75) key roadway segments within the study area, identified fourteen (14) bus lines providing service in the study area, listed existing bicycle and pedestrian facilities, and presented transit ridership data obtained from Metro.

#### Operational Impact Analysis

The analysis summarizes the ADT, ITC ridership, and VMT estimates for the following scenarios: Adjusted Baseline Conditions Non-Event Weekdays without Project; Adjusted Baseline Conditions Non-Event Weekdays with Project; Future Opening Year (2027) Conditions with Event without Project; Future Opening Year (2027) Conditions with Event with Project; Future Horizon Year (2045) Conditions with Event without Project; and Future Horizon Year (2045) Conditions with Event with Project.

Under the Adjusted Baseline Non-Event with Project Traffic scenario, the daily traffic volumes are projected to decrease along key corridors including Prairie Avenue, Manchester Boulevard and Century Boulevards within the study area, thereby improving traffic flows compared to the Adjusted Baseline Non-Event without Project daily traffic volumes. Overall, the analyzed corridors would experience less congestion on a system-wide basis, particularly during the peak periods with implementation of the proposed Project.

<sup>13</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, FTA Report No. 0123, September 2018, accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf)

<sup>14</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, FTA Report No. 0123, September 2018, accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf)

Compared to the Future Opening Year (2027) with Event without Project scenario, the daily traffic volumes under the Future Opening Year (2027) with Event with Project scenario would decrease daily traffic volumes 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. Additionally, the estimated non-event daily ridership under Future Opening Year (2027) conditions is 3,574 daily pedestrians. The Future Opening Year (2027) with Event conditions includes a sold-out NFL football game at the SoFi Stadium. The estimated daily ridership under Future Opening Year (2027) with Event (NFL) conditions is 29,280 daily pedestrians.

The daily traffic volumes under the Future Horizon Year (2045) with Event and Project scenario would decrease 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 when compared to the Future Horizon Year (2045) with Event without Project scenario. The ITC ridership analysis for the Future Horizon Year (2045) with Event with Project estimated the non-event daily ridership to be 4,462 daily pedestrians. The Future Horizon Year (2045) with NFL Game Event conditions includes a sold-out event with 70,240 attendees and 6,000 employees on a weekday at the Sofi Stadium. The daily ridership under Future Horizon Year (2045) with NFL Game Event with Project scenario is estimated at approximately 34,650 daily pedestrians.

Based on the analysis of these scenarios, implementation of the proposed Project would reduce daily traffic volumes along key roadway corridors on an average weekday basis. When an NFL game event at the Sofi Stadium is evaluated, the reduction is more substantial. When other events occur at the surrounding venues, it is anticipated the increase in ITC ridership would be more substantial. Therefore, impacts during operation related to ADT and ITC ridership would be less than significant.

CEQA Guidelines section 15064.3 establishes that VMT is generally the most appropriate measure of transportation impacts. The weekday daily VMT would be reduced by approximately 247,550 vehicle-miles (4.7%) with the implementation of the proposed Project under Future Opening Year (2027) with Event conditions in comparison to the Future Opening Year (2027) Conditions with Event without Project. The weekday VMT under the Future Horizon Year (2045) with Project with Event scenario would be reduced by approximately 316,900 vehicle-miles (5.6%) from the Future Horizon Year (2045) Conditions with Event without Project. As such, the proposed Project would result in a reduction of VMT under all

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scenarios and would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Therefore, impacts during operation related to VMT would be less than significant.

The proposed Project would connect the rest of the regional mass-transit system to and from major housing, employment and activity centers and adjacent uses in the City of Inglewood. The proposed Project would accommodate all users, including pedestrians, bicyclists, drivers, transit users, and those operating emergency vehicles. The proposed Project would also include pedestrian access improvements, including mezzanine level at each station to provide connectivity to elevated passenger walkways over adjacent streets. These elevated passenger walkways will be designed to improve both passenger access and comfort between the stations and the street level, in addition to providing multimodal access to adjacent bus facilities, pick-up and drop-off areas, and other adjacent resources. The proposed Project will also upgrade the existing sidewalks to ensure consistent ADA appliance along the transit corridor. These elevated passenger walkways and upgrades to existing sidewalks as part of the Project would minimize passenger-vehicle interactions. The City is proposing specific plan amendments and clarifications to the HPSP to address any potential conflict or inconsistency between the proposed Project and the HPSP related to streetscape improvements as the proposed Project would be located along approximately 0.5 miles of street frontage along Prairie Avenue within the HPSP area. Under the Design Guidelines, which identify objectives for the various project components and provides design guidance to help achieve the objectives, the streetscape in downtown Inglewood would be consistent with the street furniture items which currently exists on Market Street and the historic core and in accordance with the Downtown TOD Plan.<sup>15</sup> Accordingly, the proposed Project would not create or substantially increase safety hazards due to a design feature or incompatible uses.

**Construction**

Assuming arrival patterns consistent with anticipated shift times at construction sites of this nature, most of the manpower workforce trips would occur outside of the peak hours of adjacent street traffic. Construction activity would occur 24 hours a day, seven days a week. Heavy construction activities (those involving the use of large equipment on site) would over a 16-hour day schedule with two shifts, either a morning shift from approximately 7:00 AM to 3:00 PM and an evening shift from approx. 3:00 PM to 11:00 PM, or a morning shift from approximately 7:00 AM to 3:00 PM and a night shift from approximately 11:00 PM to 7:00 AM. 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 nighttime to minimize traffic impacts. Construction of the ATS guideway,

<sup>15</sup> City of Inglewood. New Downtown And Fairview Heights Transit Oriented Development Plan and Design Guidelines. <http://inglewood.arroyogroup.com/wp-content/uploads/2017/01/The-New-Downtown-Fairview-Heights-TOD-Plan-Design-Guidelines-lo-res.pdf>. November 1, 2016.

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columns and station components that could affect Prairie Avenue and Manchester Boulevard would involve construction-related traffic occurring during the off-peak hours and night hours in order to minimize effects to daily commuter traffic and potential event traffic. Delivery of construction materials could occur during the night shift. Construction activities during the day shift would primarily consist of work that could proceed without substantial disruption to daily commuter traffic and potential event traffic along Prairie Avenue and Manchester Boulevard. Additionally, some minor activity could potentially occur during periods in between construction shifts for logistics, moving equipment, etc.

**PDF TRANS-1** through **PDF TRANS-5** would be implemented to ensure access and circulation remains adequate for all modes of travel (vehicular, passenger, bicycle, and transit) and uses along the Project alignment during construction. Implementation of **PDF TRANS-2** would ensure adequate circulation and access for all uses located along the proposed alignment of the ATS system, including providing adequate vehicular access to businesses at all times, and transportation related inconveniences would be reduced to the extent feasible.

**PDF 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 Project could affect transit services.

While access to some uses would be disrupted and detoured for short periods of time during construction, through implementation of **PDF TRANS-1** through **PDF TRANS-5**, adequate access and circulation would continue to be available at all times and construction of the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and passenger facilities. With implementation of **PDF TRANS-1** through **PDF TRANS-5**, the proposed Project would result in less than significant transportation and circulation impacts during construction.

The proposed Project is consistent with the goals of Senate Bill 743 for reduction of GHG emissions, developing multi-modal transportation networks; and encouraging and supporting mixed use development. The ITC Project is also consistent with Goals 1, 2, 4, 5, 6, 7 and 8 identified in the 2020-2045 RTP/SCS.

The proposed Project includes a proposed amendment to the Circulation Element of the City's General Plan to reflect the integration of the proposed ATS system into the City's circulation system. With the proposed amendments, the proposed Project would be consistent with the Circulation Element. The proposed Project is consistent with the Land Use Element goals by increasing existing capacity and providing additional access to public transportation within the City and the region by adding an extension of transit facilities to connect visitors and residents with Downtown Inglewood and activity centers in the

City to the regional light rail system. As such, the proposed Project would not conflict with Inglewood General Plan policies related to transportation.

### 1.3.12 Tribal Cultural Resources

Tribal cultural resources may include sites, features, places, cultural landscapes, sacred places, or objects with cultural value to a California Native American tribe that are listed or determined to be eligible for listing in the California Register of Historic Places (CRHR) or included in a local register of historical resources, or a resource determined by the CEQA lead agency, in its discretion and supported by substantial evidence, to be significant and eligible for listing on the CRHR.

In accordance with Assembly Bill 52 ((Chapter 532, Statutes 2014), the City initiated the consultation process and distributed notification letters on July 31, 2018, to the four tribes which has requested future notification of proposed projects, including the Gabrielino–Tongva Tribe, Gabrielino Tongva Indians of California Tribal Council, Gabrielino/Tongva Nation, and the Gabrieleno/Tongva San Gabriel Band of Mission Indians. Additionally, the Gabrieleno Band of Mission Indians–Kizh Nation was identified as a relevant party. One response requesting consultation were received from the Gabrieleno Band of Mission Indians- Kizh Nation (Tribe).

As a result of consultation, the Tribe shared information including maps of the area that depict the historic and prehistoric trading routes, and suggested mitigation measures that may be considered to assist in reducing potential impacts from the proposed Project to any cultural resources that could be unearthed during ground disturbing activities.

With implementation of the mitigation measures, potentially significant impacts to tribal cultural resources, including related the unanticipated discovery of human remains, would be reduced to a level that is less than significant. These measures would work to prevent the destruction and loss of sensitive tribal cultural resources and ensure the proper disposition of human remains.

### 1.3.13 Utilities and Service Systems

#### Operation

Existing water and sewer lines are located within the footprint of the proposed Project along Market Street, Manchester Boulevard, and Prairie Avenue. Project components including the MSF and stations would connect to these existing water and sewer lines. The proposed Project stations and MSF would use approximately 71.86 afy less water than the existing uses located on the sites proposed for these facilities.

Southern California Edison (SCE) estimates that normal operation of the proposed Project would have an estimated peak power load flow of 4,127 kilowatts (kW). SCE would complete electricity upgrades and would be subject to its procedures and requirements for construction and environmental clearance.

Existing storm drains are located within the alignment along Market Street, Manchester Boulevard, and Prairie Avenue. It is anticipated that the proposed Project would not interfere with these storm drains during operation. Moreover, storm drains would be kept and maintained by the Los Angeles County Flood Control District (LACFCD) and the City.

No new gas connections to serve the proposed Project elements would be required except at the proposed MSF. Natural gas would be used at the MSF to serve the pressure wash system, and for space and water heating. It is anticipated that the MSF would connect to existing gas infrastructure along Manchester Boulevard at the discretion of the Southern California Gas Company (SoCalGas). Moreover, as described under **Section 1.3.5: Energy Resources**, the proposed Project would result in a net decrease in natural gas usage compared to the current uses.

#### Relocation or Construction of Utilities

There are several major utility lines identified within the Market Street segment of the proposed Project including water, sewer, stormwater, and electrical lines. Additionally, utility lines identified within the Manchester Boulevard segment of the alignment include water, sewer, wastewater, stormwater, and gas lines. Utility lines within the Prairie Avenue segment of the alignment include water, sewer, wastewater, stormwater, electrical, and gas lines. Based upon preliminary review, it appears that several utility lines within these segments would conflict with proposed Project columns. However, the location of utilities is based on a review of existing documentation and the exact locations have not been field verified. Additionally, 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 circuit located within the right-of-way of Market Street to provide power for the proposed. SCE has also noted that utilization of this existing circuit would require infrastructure upgrades to accommodate the proposed Project.

Because several utility lines within these segments would conflict with proposed Project columns. Construction could require the potential relocation of utility lines to accommodate the support structure foundations or columns. However, the utility relocations would be minor

## 1.4 ALTERNATIVES

Section 15126.6(e)(2) of the State CEQA Guidelines requires an EIR to identify an environmentally superior alternative. If the environmentally superior alternative is the No Project alternative, the EIR must identify an environmentally superior alternative among the other alternatives.

As described in **Section 5.0: Alternatives** of this Recirculated Draft EIR, a range of alternatives to the proposed Project were considered, with some alternatives initially considered determined to be not feasible. A summary of the alternatives evaluated is presented below.

### 1.4.1. Alternative 1: No Project

The No Project Alternative considers conditions if the proposed Project is not built. No new transportation infrastructure would be built within the Project study area, aside from transportation projects that are currently under construction or funded for construction and operation by 2027. These projects include transit projects funded by Measure R, Measure M, and specified in SCAG's RTP/SCS. Existing infrastructure and future planned and funded projects assumed under the No Project alternative include:

- Metro K (Crenshaw/LAX) Line –Currently under construction (2021), operating start date (Fall 2022)
- Implementation of the Citywide Event Transportation Management and Operations Plan
- Street improvements being constructed as part of the Los Angeles International Airport Landside Access Modernization Program and the Inglewood Basketball and Entertainment Center (IBEC) projects.
- Existing Bus Service – Metro Rapid and Metro Local

### 1.4.2 Alternative 2: Bus Rapid Transit (BRT) System

Bus rapid transit (BRT) is a public transit system designed to provide improved capacity and reliability relative to a conventional bus system. Typically, a BRT system includes roadway lanes that are dedicated to buses, with signal priority to buses at intersections where buses may interact with other traffic, with enhanced coordinated flow. BRT systems typically include design features to optimize passenger boarding and alighting activities, as well as ticket purchases. A BRT corridor is a section of roadway or contiguous roadways served by the uniquely branded buses along routes with a minimum length of approximately 1.5 to 2 miles.

Under this alternative, the City would construct and operate a BRT system that would connect the Forum, the SoFi Stadium, the Performance Arena, the IBEC and the Hollywood Park mixed uses to the K Line Downtown Inglewood station. The proposed route of this alternative would be a loop route starting along Florence Avenue to travel east to North Prairie Avenue where it would turn south along Prairie Avenue to the Inglewood Transit Center Facility at Prairie Avenue and Arbor Vitae adjacent to the Hollywood Park

site, and then return via Prairie Avenue northbound to travel westbound along Manchester Boulevard to Market Street to traverse northbound to Florence Avenue. The BRT would be located entirely within the public right-of-way. This route is generally consistent with the route as described in the City's New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines.<sup>16</sup>

### 1.4.3 Alternative 3: Market Street Pedestrian Promenade

Under the Market Street Pedestrian Promenade Alternative, the proposed Project and all of its components would be constructed and operate. With this alternative, Market Street between Florence Avenue and Manchester Boulevard would be entirely closed to vehicular traffic. Regent and Queen streets would have barricades to prevent traffic turning onto Market Street in both directions. East-west traffic along Regent Street and Queen Street would be allowed without being able to turn on to Market Street. Traffic would be diverted to surrounding streets including La Brea Avenue and Locust Street. The establishment of this pedestrian promenade would encourage pedestrian activity by improving walkability within Downtown Inglewood.

### 1.4.4 Alternative 4: 4<sup>th</sup> Station Alternative

This alternative considers the addition of a fourth station to the ATS as proposed at Manchester Boulevard, east of the Market Street/Manchester Boulevard intersection as shown in **Figure 5.0-3: Alternative 4: 4<sup>th</sup> Station Alternative – Manchester Boulevard Station**.

The station configuration would consist of a center platform with vertical circulation to a pedestrian bridge located under the station platform level. Passengers would have the ability to access the station through a pedestrian bridge. As with the other ITC stations, this additional station would consist of a center platform configuration with the platform located at level 3 (approximately 50 feet above the existing grade). Passengers would access the platform from a mezzanine (at level 2) connected by pedestrian bridges to vertical circulation elements to provide access to the sidewalk (at level 1) on the north side of Manchester Boulevard.

### 1.4.5 Alternative 5: Prairie Avenue Single Station Alternative

The proposed Project modifies and relocates Prairie Avenue to the east to maintain the current roadway capacity. The relocation of Prairie Avenue and the need for a passenger station connection on the sidewalk/ground level affects properties located east of Prairie Avenue. This Alternative avoids affecting these properties by consolidating the two proposed stations on Prairie Avenue into a single station that would be located adjacent to the City's Intermodal Transit Facility at the City's Civic Center site. Passengers

<sup>16</sup> City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, November 1, 2016

would connect to the ground/sidewalk level within the City-owned Civic Center site. **Figure 5.0-4: Alternative 5: Prairie Avenue Single Station Alternative** illustrates this alternative.

This Alternative maintains Prairie Avenue within its existing right-of-way; however, one to two lanes would be lost, thereby reducing the capacity of the roadway. Specifically, one travel lane in each direction along Prairie Avenue between Arbor Vitae and La Palma, one lane in the southbound direction between La Palma and Pincay Drive, and one lane in each direction between Pincay Drive and Manchester Boulevard would be lost under this Alternative 5: Prairie Avenue Single Station Alternative.

#### 1.4.5 Alternative 6: Maintenance and Storage Facility Alternative

The proposed Project involves siting the MSF within the southeastern portion of the site at 500 E. Manchester Boulevard closest to the corner of Nutwood Street and Spruce Avenue that contains a Vons grocery store and gas station, with other businesses, including a private gym, bank branch and coffee shop located in the building with Vons. This siting of the MSF requires removal of the gas station currently located on the Vons site in order to provide for short-term construction staging to construct the MSF and, thereafter, to provide parking. This Alternative moves the MSF to the northwestern portion of this property closest to the south corner of Hillcrest Boulevard and Manchester Boulevard as shown in **Figure 5.0-5: Alternative 6: Maintenance and Storage Facility Alternative**. The site containing the MSF would be approximately 14,000 SF in size. This alternative would have the same elevated profile and footprint of the MSF and its supporting facilities (e.g., access, circulation, employee parking, etc.). With this alternative, the existing gas station would remain on the site.

#### 1.4.6 Environmental Superior Alternative

An EIR is required to identify the Environmentally Superior Alternative from among the range of reasonable alternatives that are evaluated. CEQA Guidelines section 15126.6(e)(2) requires that an environmentally superior alternative be designated and states that if the Environmentally Superior Alternative is the No Project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Of the alternatives evaluated in this Recirculated Draft EIR, the Environmentally Superior Alternative would be Alternative 2, BRT System Alternative.

With mitigation, the Project would not result in any significant impacts and, for this reason, Alternative 2 would not avoid any significant impact that would result from the Project as proposed. Alternative 2 is considered the Environmentally Superior Alternative because it would lessen impacts to the greatest degree of the alternatives evaluated. The BRT System Alternative would, however, not meet the City's basic objectives for the proposed Project.

With the BRT System Alternative, the proposed Project would not be constructed. No demolition or construction activities would occur, except along the public right-of-way where BRT-only lanes along the route are implemented. The BRT System Alternative would avoid all significant construction related effects and impacts identified for the proposed Project.

Unlike the No Project Alternative, the BRT System Alternative would meet some of the City's objectives including providing a direct and convenient connection to the Metro regional transit system, encouraging intermodal transportation systems by providing convenient transit, and providing safe, reliable, and convenient access to businesses in the City. The BRT System Alternative would also meet the City's objectives to support the ongoing economic revitalization, growth opportunities within the Downtown TOD Plan area, and encourage redevelopment and investment within the City in areas served by the proposed Project. The BRT System Alternative would not, however, create additional public parking to support ongoing economic revitalization efforts. The proposed Project would create additional public parking facilities in three locations along the proposed Alignment. In addition, the objective to provide sufficient transit connection capacity between Metro's regional transit system and the City's new major activity centers would not be met by this BRT alternative, resulting in limited increased transit mode split, limited reduction in vehicle trips, and consequently, limited reduction in per-capita vehicle miles traveled to the City's major activity centers. The estimated daily BRT ridership with Event Conditions would be approximately 20 percent of the projected ridership for the proposed ATS, providing transit options, increasing transit mode split, reducing vehicle trips, and reducing per capita VMT to the City's major activity centers. The BRT System Alternative would also not meet the City's objectives to maintain existing roadway capacity, reduce the City's traffic congestion and alleviate growing demand on the existing roadway network on both major arterials and residential streets for both nonevent and event days.

### 1.5 AREAS OF KNOWN CONTROVERSY AND ISSUES TO BE RESOLVED

The State CEQA Guidelines<sup>17</sup> require that a Draft EIR summary identify areas of controversy known to the lead agency, including issues raised by other agencies and the public. Issues identified in comments on the Notice of Preparation (NOP), the revised NOP (see **Appendix B**), and on the 2020 Draft EIR include the following topics:

- Impacts to historical buildings along Market Street
- Land use conflicts with nearby residential uses and with the goals, policies, guidelines, and standards of the HPSP
- Construction-related air quality impacts
- Construction and operational noise impacts to nearby sensitive receptors

<sup>17</sup> California Public Resources Code, tit. 14, Div. 6, ch. 3, State CEQA Guidelines, sec. 15123.

- Impacts to students and staff at Kelso Elementary School, including potential construction and operational noise, air quality, and hazardous materials impacts
- Increases in traffic congestion in downtown Inglewood during construction
- Economic impacts to businesses along the Project alignment, including impacts caused by potentially reducing access to businesses during construction and by potentially reducing the number of available public parking spaces
- Visual compatibility with adjacent land uses
- Access for emergency vehicles
- Potential closure of the existing Vons market at the site of the proposed MSF

To the extent these topics implicate potential direct or indirect (secondary) environmental impacts of the proposed Project, those topics are addressed in **Section 4.0: Environmental Impact Analysis**.

## 1.6 PROPOSED MITIGATION MEASURES

**Table 1.0-4: Summary of Mitigation Measures** provides the mitigation program for the proposed Project that has been identified to reduce potentially significant impacts to less than significant. In addition, the proposed Project includes the CCP and the Design Guidelines to proactively address the potential effects of the construction and operation of the proposed Project on the community. The CCP and the Design Guidelines identify features and actions incorporated into the proposed Project to lessen or avoid potential impacts.

## 1.7 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL EFFECTS

As required by the State CEQA Guidelines Section 15126.2(b), this section identifies the significant environmental effects that cannot be avoided if the proposed Project is implemented. The State CEQA Guidelines require that an EIR "Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications, and the reasons why the project is being proposed, notwithstanding their effect, should be described."<sup>18</sup> No significant impacts have been identified in the analyses in the Recirculated Draft EIR.

## 1.8 SUMMARY TABLE

**Table 1.0-4: Summary of Findings** has been organized to correspond with the environmental issues discussed in **Section 4.0**. The summary table is arranged in four columns:

1. Environmental impacts ("Impact").

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<sup>18</sup> California Code of Regulations, tit. 14, div. 6, ch. 3, California Environmental Quality Act Guidelines, sec. 15126.2(b).

2. Level of significance without mitigation ("Significance Before Mitigation").
3. Mitigation measures ("Mitigation Measure").
4. The level of significance after implementation of mitigation measures ("Significance After Mitigation").

If an impact is determined to be significant or potentially significant, feasible mitigation measures are identified, where appropriate. More than one mitigation measure may be required to reduce the impact to a less-than-significant level. The analysis in the Recirculated Draft EIR assumes all applicable plans, policies, and regulations would be implemented, including, but not necessarily limited to, City General Plan policies, laws, and requirements or recommendations of the City of Inglewood. Applicable plans, policies, and regulations are identified and described in the Regulatory Setting of each issue area and within the relevant impact analysis. A description of the organization of the environmental analysis, as well as key assumptions regarding the approach to the analysis, is provided in **Section 4.0**.

Table 1.0-4  
Summary of Findings

Impact	Significance Before Mitigation	Project Design Features/Mitigation Measures	Significance After Mitigation
4.1 Aesthetics	LS	<p><b>PDF AES-1 Construction (CCP)</b></p> <p>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:</p> <ul style="list-style-type: none"> <li>Temporary lighting will be limited to the amount necessary to safely perform the required work and will 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.</li> <li>Light trespass shall not exceed one foot-candle above ambient light level as measured at any adjacent residential and transient properties.</li> <li>Temporary sidewalks and any sidewalk adjacent to construction activities shall be illuminated to City Standards to protect public safety.</li> <li>To minimize the visual effects of construction the following measures shall be implemented:</li> <li>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.</li> <li>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.</li> </ul>	LS
		<p><b>Impact AES-1a:</b> Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project cause degradation to visual character?</p>	

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Impact	Significance Before Mitigation	Project Design Features/Mitigation Measures	Significance After Mitigation
		<p><b>PDF AES-2 Tree Replacement (CCP)</b></p> <p>A Tree Removal and Replacement Plan will 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:</p> <ul style="list-style-type: none"> <li>Tree removal and replacement shall comply with the City of Inglewood Municipal Code and the Design Guidelines.</li> <li>Removal of existing healthy and flourishing trees will be avoided where feasible.</li> <li>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.</li> <li>New permanent replacement palm trees shall be a minimum of 20 feet in height.</li> <li>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.</li> <li>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.</li> <li>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 will conduct an inspection of all permanent replacement trees</li> </ul>	
		<p>NOTES: LS = less than significant; PS = potentially significant; S = significant and unavoidable; NI = no impact; NA = not applicable</p>	

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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.

**PDF AES-3 Lighting (Design Guidelines)**

Station Design

- Station canopies will have indirect accent lighting.
- Lighting will clearly highlight pedestrian paths including those to stairs, escalators, and elevators.
- Accent and functional lighting will be strategically placed to minimize spillover.
- Accent and functional lighting controls will 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 will complement station lighting design.
- Light fixtures will be concealed or minimally visible.
- Accent and functional lighting will be strategically placed to minimize spillover.
- Code required lighting along the guideway will be designed to minimize visibility from the ground level.

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- Street lighting will 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 will be placed to minimize spillover
  - Building entrances will be well lit.
  - Lighting will 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 will be well lit with particular attention paid to the comfort and safety of the public.
- Elevated Passenger Walkway
- Where provided, functional lighting will be placed to minimize spillover.
  - Overall lighting design will not interfere with roadway traffic below.
  - Accent lighting will complement station lighting design.
  - Accent and general lighting controls will be programmable and sensor controlled to allow for daytime, nighttime, and event settings.

**PDF AES-4 Tree Placement (Design Guidelines)**

- An arborist report surveying the condition and extents of all existing trees in the Project area will 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) will remain, where feasible.
- An Approved Plant Palette based on the City's approved street tree list will

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- be used as a basis for all sections of new trees.
- The quantity and species of existing trees removed by the ITC Project will be replaced in accordance with the City's current landscape guidelines.
  - Protected species in the Inglewood Municipal Code, Tree Preservation will remain.
  - City of Inglewood guidelines for tree spacing will be followed, considering species of trees and the desired canopy coverage.
  - Trees will be planted on both sides of the roadway where feasible.
  - Trees will be positioned at regular intervals relative to the guideway column supports to create a consistent rhythm.
  - On Market Street, trees will be planted at a rhythm and scale to create a continuous visual canopy over the pedestrian realm, where feasible.
  - On Manchester Boulevard, trees will 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 will continue the stately rhythm from the Inglewood Cemetery north of Manchester Boulevard. Trees on the west side will be spaced to match the rhythm of the east side and the guideway support structure to the extent feasible.

**PDF AES-5 Signage (Design Guidelines)**

- Physical Non-Digital Signage incorporated into the Project will have a distinct visual graphic identity that is consistent across all physical design elements of the project
- All signage will be approved by City of Inglewood and the Authority Having Jurisdiction (AHJ).

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- Existing signage along the entire ITC alignment, which are affected, will be replaced, along with its infrastructure, and will meet its originally intended design intent and function.
  - Signage replaced that originated on private property will be approved by the City of Inglewood and the sign/property owner.
- No mitigation measures required.

**ImpactAES-1b:** If the project is in an urbanized area, would the project be consistent with applicable zoning and planning regulations governing scenic quality? LS

None Required

**Threshold AES-2:** Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area. LS

None Required

**4.2 Air Quality**

**Impact AQ-1:** Conflict with or obstruct implementation of the applicable air quality plan. PS

See MM AQ-1

LS

**Impact AQ-2:** Result in a cumulatively considerable net increase of any criteria PS

**PDF AQ-1 Construction Air Quality Program (CCP)**

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

LS

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pollutant for which the project region is nonattainment under an applicable Federal or State ambient air quality standard.

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,

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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

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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

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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.

- Contractors shall maintain and operate construction equipment to minimize exhaust emissions. All construction equipment must be properly tuned and

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maintained in accordance with the manufacturer's specifications and documentation demonstrating proper maintenance, in accordance with the manufacturer's specifications, shall be maintained on site. Tampering with construction equipment to increase horsepower or to defeat emission control devices must be prohibited.

- Require in all applicable bid documents, purchase orders, and contracts of the requirement to notify all construction vendors, contractors, and/or haul truck operators that vehicle and construction equipment idling time will be limited to no longer than five minutes, consistent with the CARB's policy. For any idling that is expected to take longer than five minutes, the engine should be shut off. Notify construction vendors, contractors, and/or haul truck operators of these idling requirements at the time that the purchase order is issued and again when vehicles enter the Project area. To further ensure that drivers understand the vehicle idling requirement, post signs at the proposed Project entry gates and throughout the Project alignment, where appropriate, stating that idling longer than five minutes is not permitted.

**MM AQ-1:** PDF AQ-1, Construction Air Quality Program, shall be implemented during construction.

<b>Impact</b>	<b>AQ-3:</b> Expose sensitive receptors to substantial pollutant concentrations.	PS	See MM AQ-1	LS
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**4.3 Biology Resources**

<b>Impact</b>	<b>BIO-1:</b> Interfere substantially with the	PS	<b>BIO-1 Conservation of Faunal Resources: Nesting Birds/Raptors:</b> The City shall require demolition and construction contractors to implement the following	LS
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movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

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 (6) months until the completion of construction activities, as specified below. Nesting bird survey shall include:
  - Prior to any demolition and/or construction, and a least every six (6) 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 (6) 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 demolitions areas and within 300 feet of all disturbance areas. 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

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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 District and, upon request, the CDFW. Based on the submitted information, the District, acting as the lead agency (and CDFW, if CDFW requests) shall determine whether to allow a narrower buffer.

- During the year prior to demolition and/or construction, a survey shall be conducted by a qualified biologist for bat habitat areas within the construction footprint of the proposed Project between March 1 and September 30 and a least every six (6) months until the completion of construction activities. The areas shall be characterized as to their potential for supporting a bat maternal colony or nursery site. The survey shall include all trees and any manmade structures, or other bat habitat areas that could be affected. If bat maternal colony or nursery sites are identified, then these areas shall be avoided by demolition and/or construction during the bat breeding season, from March 1 through September 30. Each tree or structure supporting an active maternity roost shall be inspected a week prior to disturbance to determine the presence or absence of roosting bats.

- The biologist shall submit weekly reports to the City's Parks, Recreation and Library Services Director, or designated representative, regarding the results of the nesting bird surveys.

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**Impact BIO-2:** Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

**PDF AES-2 Tree Replacement (CCP)** LS

A Tree Removal and Replacement Plan will 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 Design Guidelines.
- Removal of existing healthy and flourishing trees will 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

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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 will 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.

**PDF AES-4 Tree Placement (Design Guidelines)**

- An arborist report surveying the condition and extents of all existing trees in the Project area will 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) will remain, where feasible.
- An Approved Plant Palette based on the City's approved street tree list will be used as a basis for all sections of new

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trees.

- The quantity and species of existing trees removed by the ITC Project will be replaced in accordance with the City's current landscape guidelines.
- Protected species in the Inglewood Municipal Code, Tree Preservation will remain.
- City of Inglewood guidelines for tree spacing will be followed, considering species of trees and the desired canopy coverage.
- Trees will be planted on both sides of the roadway where feasible.
- Trees will be positioned at regular intervals relative to the guideway column supports to create a consistent rhythm.
- On Market Street, trees will be planted at a rhythm and scale to create a continuous visual canopy over the pedestrian realm, where feasible.
- On Manchester Boulevard, trees will 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 will continue the stately rhythm from the Inglewood Cemetery north of Manchester Boulevard. Trees on the west side will be spaced to match the rhythm of the east side and the guideway support structure to the extent feasible.

No mitigation measures required

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<b>4.4 Cultural Resources</b>		

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LS	<p><b>PDF CUL-1 Historic Resources (Design Guidelines)</b></p> <p>LS</p> <p>The final Project design must consider design variables (elevation of guideway, width of guideway, distance of the guideway from the resources, and the dimensions, placement, and spacing of support columns) and resource variables (building's height, scale, number of street-facing facades, width of primary facade, front setback, project elements overhanding the sidewalk, and viewpoints from which the resource can best be discerned in its entirety). The final Project design shall ensure minimal impacts to the setting of historical resources, and little or no visual obstruction of the resource's street-facing façades from the optimal viewpoints. In order to meet these performance-based standards, the following Project Design Features shall be incorporated into the final Project design:</p> <ul style="list-style-type: none"> <li>The guideway's elevation and distance from the façade of the historical resource will be sufficient for the guideway to visually clear the top of the historical resources' street-facing façade(s) when viewed from the optimal viewpoints. The final Project design is expected to achieve no visual obstruction of any of the identified historical resources from the guideway.</li> <li>At the former Fox Theatre, and for 100 feet on either side of the resource, the guideway elevation (measured from the ground plane to the underside of the guideway structure) will be a minimum of 52 feet from grade in order to achieve unobstructed views of this resource, including its monumental sign pylon.</li> </ul>	LS

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PS	<ul style="list-style-type: none"> <li>The dimensions, placement, and spacing of the guideway support columns will be such that the obstruction of views of the historical resources' street-facing façade(s) when viewed from the optimal viewpoints will be minimized. For five of the identified historical resources—Holy Faith Episcopal Church, former United Bank of California (now Broadway Federal Bank), former Fox Theatre, Professional Building, and Inglewood Park Cemetery—the final Project design is expected to completely avoid visual obstructions from support columns.</li> <li>For five of the historical resources—the former Bank of Inglewood, former J.C. Penney, Bank of America, the Forum, and Lighthouse McCormick Mortuary—views that are completely unobstructed by support columns are not necessary for the resource to convey its significance. A small portion of the resources' primary façades will be intermittently obscured depending on the position of the viewer. However, due to the scale and/or setback of these resources, their primary façades will remain readily discernable.</li> </ul> <p>No mitigation measures required.</p> <p><b>See MM TCR-1 to MM TCR-4.</b></p>	LS
PS	<p><b>Impact CUL-2:</b> Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?</p> <p><b>Impact CUL-3:</b> Disturb any</p>	PS
<b>See MM TCR-1, MM TCR-3, MM TCR-5.</b>		

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human remains, including those interred outside of formal cemeteries.	PS = potentially significant	S = significant and unavoidable; NI = no impact; NA = not applicable	NA = not applicable

4.5 Energy

LS

PDF ENERGY-1 (Design Guidelines)

LS

- **Energy Efficiency** - Where California Energy Efficiency Standards apply, the project should be more energy efficient than allowed. For energy-using equipment not governed by California Energy Efficiency Standards, best available energy efficient technologies should be used. Advanced commissioning of building systems should be conducted to ensure systems are operating as designed.
- To achieve energy use reduction, passive strategies taking advantage of the favorable local climate should be considered where feasible. The use of solar canopies as shade structures in addition to roof-mounted solar is another energy saving strategy.
- **Water Efficiency** - In order to reduce excessive water consumption, the project should identify and implement appropriate opportunities to reduce or eliminate potable water use indoors and in landscape areas.
- **Material Conservation And Resource Efficiency** - In order to reduce the environmental impact from the use of construction materials, the project should minimize the use of virgin materials. This can be accomplished by increasing the use of materials that are reused, recycled, rapidly renewable, locally sourced, and durable. In order to

**Impact E-1:** Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.

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determine the best approach to reducing the overall environmental impact from use of materials, a life cycle assessment (LCA) could be used.

- **Environmental Quality** - In order to protect and enhance the health and comfort of occupants, the project should provide a high quality, sustainable indoor environment that is designed to maximize natural daylighting and views of the outdoors where feasible. Indoor spaces should use high efficiency air filtration and should create a comfortable indoor acoustical environment. Materials and systems should be selected that will provide for a healthy indoor environment.

No mitigation measures required.

LS

None Required

LS

4.6 Geology

PS

LS

**MM GEO-1:** The proposed Project shall be designed to accommodate fault rupture where present in accordance with applicable Caltrans guidelines, including Memo to Designers 20-8 (Analysis of Ordinary Bridges that Cross Faults), dated January 2013; and Memo to Designers 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

**Impact GEO-1:** Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo

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Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42.

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. As noted in Caltrans Memorandum to Designers (MTD) 20-8, bridge type structures, such as the ATS Guideway, must be designed for the displacement demand resulting from a static fault offset, the dynamic response due to ground shaking, and any other fault-induced hazards (e.g., creep) that may occur at the site. Caltrans MTD 20-8 provides a method for obtaining the displacements at columns and abutments at fault crossings; all the requirements must also be followed. Adequate bearing seats must be provided so the superstructure can slide at the abutment, bent, or hinge seats without falling.

**MM GEO-2:** During site investigation 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 in the Project area to support adjustments to the proposed Project's design.

The investigation shall include a supplemental fault investigation conducted along the trace of the Townsite fault to further refine the location of the feature and assess the activity level where it crosses the proposed ATS alignment and any stations.

The investigation shall include the following surface and subsurface methods:

- Aerial photograph analysis;
- Geophysical surveys (e.g., seismic reflection and/or seismic refraction) to refine the identified geophysical anomaly

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associated with 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 ITC alignment; and
- Exploratory drilling and sampling (e.g., hollow stem auger and CPT borings), as necessary, if definitive information regarding the trace of the Townsite fault cannot be adequately delineated across the proposed ITC alignment within the limits of fault trenching.

Based on the results of these investigations, column placements and facility designs would be adjusted to accommodate geologic conditions identified. Further, the 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). Stations/structures shall be located to avoid the fault rupture hazard where present.

Columns and foundations for the guideway and stations, as well as any other ATS facilities shall be located to avoid the fault rupture hazard where present. The design fault offset where evaluating features crossing the ATS guideway alignment shall be determined as the larger of the:

- Deterministically derived average displacement.
- Probabilistically derived displacement consistent with a 5 percent in 50-years probability of exceedance.

Probabilistic procedures shall follow those outlined in Abrahamson [2008] and Petersen et al, [2011] of the *Fault*

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19 California Geological Survey, Note 49: Guidelines for Evaluating the Hazard of Surface Fault Rupture, <https://www.conservation.ca.gov/egs/Documents/Publications/CGS-Notes/CGS-Note-49.pdf>

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construction personnel attended the training.

c) Direct the performance of paleontological resources monitoring by a qualified paleontological monitor (meeting the standards of the SVP, 2010). Paleontological resources monitoring shall be conducted pursuant to the monitoring and mitigation program developed under (a). Monitoring activities may be altered or ceased if determined adequate by the qualified paleontologist. Monitors shall have the authority to and shall temporarily halt or divert work away from exposed fossils or potential fossils and establish a 50-foot radius temporarily halting work around the find. Monitors shall prepare daily logs detailing the types of ground disturbing activities and soils observed, and any discoveries.

d) If fossils are encountered, determine their significance, and, if significant, supervise their collection for curation. Any fossils collected during Project-related excavations, and determined to be significant by the qualified paleontologist, shall be prepared to the point of identification and curated into an accredited repository with retrievable storage.

e) Prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the paleontological monitoring. If there are significant discoveries, fossil locality information and final disposition shall be included with the final report which would be submitted to the appropriate repository 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 could affect Older Quaternary Alluvium.

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**4.7 Greenhouse Gas**

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

LS None Required

LS

**Impact GHG-2:** Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

LS None Required

LS

**4.8 Hazards and Hazardous Waste**

**Impact HAZ-1:** Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

LS

**PDF HAZ-1 Hazardous Materials Program (CCP)**

LS

The following practices will be followed during construction to address the potential for encountering hazardous materials during construction of the Project.

- **Building Demolition Plan** – Prior to any demolition occurring, conduct an evaluation of all buildings built prior to 1980 to be demolished to identify the presence of asbestos containing materials (ACMs) and lead-based paint (LBP). Remediation shall be implemented in accordance with the recommendations of these evaluations to ensure that no ACMs or LBP remain present and to ensure ACMs and LBP are removed to levels established for public safety.
- **Hazardous Materials Contingency Plan** – Prior to construction, prepare a plan addressing the potential for

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		<ul style="list-style-type: none"> <li>• <u>Soil Management Plan</u> – After final construction plans are prepared showing the lateral and vertical extent of soil excavation during construction are prepared, prepare a Soil Management Plan to 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.</li> <li>• <u>Health and Safety Plan</u> – Prior to construction, prepare a Health and Safety Plan to address the potential for exposure to the constituents of concern identified in the limited Phase II ESA.</li> </ul>	LS
		No mitigation measures required.	
		None Required	

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		<b>4.9 Land Use</b>	
		<p><b>Impact LU-1:</b> Physically divide an established community.</p> <p><b>Impact LU-2:</b> Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.</p>	LS
		None Required	
		None Required	
			LS
		<b>4.10 Noise and Vibration</b>	
		<p><b>Impact NOI-1:</b> Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</p>	PS
		<b>PDF-NOISE-1 Construction Noise Control Plan (CCP)</b>	LS
		<p>A Construction Noise Control Plan shall be developed in coordination with an acoustical/vibration consultant approved by the City and 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 Federal Transit Administration (FTA)'s General Assessment Construction Noise Criteria. The following construction noise reduction measures shall be incorporated into the plan:</p> <ul style="list-style-type: none"> <li>• Install temporary noise barriers that reduce sound at receptors;</li> <li>• For any idling that is expected to take longer than five minutes, the engine shall be shut off;</li> </ul>	

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- 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

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- 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 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:

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- Halting/staggering concurrent construction activities in certain locations;
- Reducing the speed or intensity of the of heavy-duty construction equipment being operated simultaneously.
- Operate equipment at the lowest possible power levels.
- Modifying equipment, such as dampening of metal surfaces or other redesign to minimize metal-to-metal impacts.

No mitigation measures required

**Impact NOI-2:** Generation of excessive groundborne vibration or groundborne noise levels?

**PDF NOISE-2 Construction Vibration Reduction Plan (CCP)**

Prior to the issuance of any demolition or construction permit for each phase of the 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 to ensure impacts from ground borne vibration are less than significant:

- 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.

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- 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 project activities.
- Crack gauges shall be installed on multiple representative cracks, particularly on sides of the building facing the 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 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

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- 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

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- 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 post-construction 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 Project and/or show how the 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 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

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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 (1) 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.

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- Limit the location of small bulldozer to 25 feet of off-site vibration sensitive receptors.
- No mitigation measures required.

4.11 Population, Employment, and Housing

Impact POP-1: Induce substantial unplanned population or employment growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? LS None Required LS

4.12 Transportation

LS

PDF TRANS-1 Transit Access and Circulation Program (CCP)

LS

Impact T-1: Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

The Project Task Force (as identified in the Construction Commitment Program) will be responsible for the following:

- Ensuring that access to bus transit stops and bus circulation are always maintained, unless infeasible and closure is approved by the City.
- Coordinating with Metro and any other transit service providers to:
  - Relocate bus stop(s) if necessary, during construction with appropriate wayfinding signage and information

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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.

**PDF TRANS-2 Construction Staging & Traffic Control Program (CCP)**

A Construction Staging and Traffic Control Program will be developed by members of the Project Task Force (as defined in the Construction Commitment Program), subject to review and acceptance by the City and/or the JPA, and will 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

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- 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 will 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

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- 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 should 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.

**PDF TRANS-3 Preliminary Haul and Overload Routes (CCP)**

- Haul routes and overload/oversized vehicle routes are subject to review and approval by the City.

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- To the extent possible, truck deliveries and hauling of bulk materials such as aggregate, bulk cement, dirt, etc. to the Project area, and hauling of material from the Project area, shall be scheduled during off-peak hours to avoid the peak commuter traffic periods on designated haul routes.
- Truck deliveries and hauling of dirt, aggregate, bulk cement, and all other materials and equipment, shall be on designated routes only (freeways and nonresidential streets).

**PDF TRANS-4 Pedestrian Access Program (CCP)**

A Pedestrian Access Program will be developed by members of the Project Task Force (as defined in the Construction Commitment Program), subject to review and acceptance by the City and/or the JPA, and will 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 pedestrian wayfinding signage.

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- 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 Federal 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 Inglewood Unified School District 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.

**PDF TRANS-5 Parking Management Plan (CCP)**

A Parking Management Plan (as defined in the Construction Commitment Program) will 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:

- Parking, staging, or queuing of Project-related vehicles, including workers' personal or project-assigned vehicles,

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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.

No mitigation measures required

None Required

LS

Impact T-2: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

None Required

LS

Impact T-3: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

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Inglewood Transit Connector Project  
November 2021

Impact	Significance Before Mitigation	Project Design Features/Mitigation Measures	Significance After Mitigation
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NOTES: LS = less than significant; PS = potentially significant; S = significant; SU = significant and unavoidable; NI = no impact; NA = not applicable

Impact T-4: Result in LS None Required LS

**4.13 Tribal Cultural Resources**

Impact TCR-1: Cause a PS MM TCR-1: Retention of a Tribal Cultural Resources LS

substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or

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ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1 in applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1. The lead agency shall consider the significance of the resource to a California Native American tribe.

activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project area are completed, or when the Tribal Representatives and Tribal Monitor have indicated that all upcoming ground-disturbing activities at the Project area 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 Tribal monitor approved by the Consulting Tribe. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes. If human remains and/or grave goods are discovered or recognized at the Project area, 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 area 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

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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.

**MM TCR-4** and **MM TCR-5** will supplement **MM TCR-1**.

**MM TCR-2: Monitoring and Mitigation Plan.** Prepare, design, and implement a monitoring and mitigation program for the Project. The Plan 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 Plan shall be prepared and approved by a qualified archaeologist prior to the issuance of the first grading permit.

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**MM 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 Plan as outlined in (a), 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.

**MM 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 Plan. 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

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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 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 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

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scientifically consequential information contained in the archaeological resource through laboratory processing and analysis of the artifacts. The 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 applicant. The final monitoring report shall be submitted to the applicant within 90 days of completion of excavation and other ground disturbing activities that require monitoring.

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4.14 Utilities

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

**PS**  
**MM UT-1:** Prior to the award of the DBFOM contract, and start of any demolition or construction activities, the City shall be responsible identifying the locations of existing utilities potentially affected by the 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 proposed Project's 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.

**MM UT-2:** Prior to the award of the DBFOM contract, and start of construction, the City shall contact Southern California Edison (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 proposed Project's 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.

**LS**

2.0 INTRODUCTION

This document is the Recirculated Draft Environmental Impact Report (Recirculated Draft EIR) for the Inglewood Transit Connector Project (proposed Project). This Recirculated Draft EIR has been prepared by the City of Inglewood (City), acting as the Lead Agency in conformance with the California Environmental Quality Act (CEQA). The City revised the Draft EIR as circulated for review in December 2020 to address changes to the design of the Project, described below, made after circulation of the Draft EIR. The design of the Project was revised in response to comment and input from stakeholders in the community. The revised Project as described and evaluated in this Recirculated Draft EIR, avoids the significant impacts identified in the December 2020 Draft EIR. All impacts of the revised Project are less than significant with mitigation.

2.1 PURPOSE AND TYPE OF EIR

2.1.1 Statutory Authority

Under CEQA, public agencies are required to evaluate proposed development projects for their effect on the physical environment and identify any feasible measures that would avoid or lessen significant environmental effects. The EIR is an informational document used in the planning and decision-making process and is intended to provide disclosure of the environmental consequences of a project to the public and agency decision makers before action is taken to approve project permits.

The preparation of an EIR provides information to assist a lead agency in making decisions on the project but does not control the lead agency's exercise of discretion. Specifically, as noted in the State CEQA Guidelines:<sup>1</sup>

- (a) *An EIR is an informational document which will inform public agency decision-makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information which may be presented to the agency.*
- (b) *While the information in the EIR does not control the agency's ultimate discretion on the project, the agency must respond to each significant effect identified in the EIR by making findings under Section 15091 and if necessary, by making a statement of overriding consideration under Section 15093.*
- (c) *The information in an EIR may constitute substantial evidence in the record to support the agency's action on the project if its decision is later challenged in court.*

1 California Code of Regulations, tit. 14, div. 6, ch. 3, State CEQA Guidelines, sec. 15121.

The City of Inglewood is the Lead Agency for the proposed Project under CEQA<sup>2</sup> and is responsible for the preparation of this Recirculated Draft EIR.

The California State Legislature has determined that certain projects, and classes of projects, are excluded from CEQA's requirements. (See Cal. Pub. Resources Code, § 21080 et seq.). If a project fits within one of the CEQA exemptions identified by the Legislature (known as "statutory exemptions"), the Lead Agency may approve the project without conducting any CEQA review for the project. The proposed ITC Project qualifies for a statutory exemption. In particular, CEQA provides a statutory exemption for "[f]acility extensions not to exceed four miles in length which are required for the transfer of passengers from or to exclusive public mass transit guideway or busway public transit services." (Pub. Resources Code, § 21080, subd. (b)(12); see also State CEQA Guidelines, § 15275(b).) The proposed Project meets this definition.

The proposed Project will operate as a "facility extension" of the existing Metro Crenshaw/LAX light-rail line by providing light rail transit facilities, including a station (the Market Street/Florence Avenue Station) and passenger walkway that connects the existing Crenshaw/LAX line's Downtown Inglewood Station to the proposed Project's fixed guideway line. At 1.6 miles in length, the proposed Project does not "exceed four miles in length." The proposed Project is "required for the transfer of passengers" because the proposed Project is necessary to close the last-mile gap between the Crenshaw/LAX line and the City's new major housing, employment and activity centers. Finally, the proposed Project will transfer passengers "from or to exclusive public mass transit guideway" by transferring passengers both to and from the Crenshaw/LAX light-rail line's Downtown Inglewood Station to the City's new major housing, employment and activity centers. The proposed Project is therefore exempt from CEQA under that statutory exemption for facility extensions as set forth in Public Resources Code section 21080, subdivision (b)(12).

Although the proposed Project is statutorily exempt from CEQA, the City has nevertheless voluntarily elected to prepare this Recirculated Draft EIR to provide a comprehensive analysis of the proposed Project's potential environmental effects, to analyze alternatives to the proposed Project, to identify mitigation measures to avoid or substantially reduce the proposed Project's potentially significant environmental impacts, and to obtain public and agency input regarding the proposed Project and its potential impacts on the environment. Following the completion of CEQA review, the City of Inglewood City Council will consider whether to approve the Project. Although not required to do so, if the City Council decides to approve the Project, the City Council will certify the Final EIR and adopt CEQA Findings

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<sup>2</sup> Public Resources Code, Section 21067

of Fact and a Statement of Overriding of Considerations for the Project. If the Project is approved, the City will also file a CEQA Notice of Determination (NOD) and a CEQA Notice of Exemption (NOE) for the Project.

### 2.1.2 Type of Environmental Document

As provided for in the CEQA Guidelines, Section 15161, this Recirculated Draft EIR is a project EIR.<sup>3</sup> A project EIR examines the direct and indirect environmental impacts of a specific development project. This type of EIR should focus primarily on the changes in the environment that would result from the development project and shall examine all phases of the proposed Project including construction and operation.

### 2.1.3 Purpose and Scope of the Recirculated Draft EIR

As described in the CEQA Guidelines, an EIR is a public information document that assesses potential environmental effects of a proposed project, and identifies mitigation measures and alternatives to a proposed project that could reduce or avoid substantial adverse environmental impacts. CEQA requires that State and local government agencies to consider the environmental consequences of projects over which they have discretionary authority.

The proposed Project, as defined in **Section 3.0: Project Description**, would require approval of discretionary actions as defined by CEQA and is the subject of this Recirculated Draft EIR. The EIR is used in the planning and decision-making process. The purpose of an EIR is not to advocate or recommend either approval or denial of a proposed project.

This Recirculated Draft EIR was prepared to provide information to public agencies, the general public, and decision makers regarding potential environmental impacts related to the components of the construction and operation of the proposed Project.

The objectives of CEQA include: (1) informing governmental decision makers and the public about the potentially significant environmental effects of proposed activities; (2) identifying the ways that environmental damage can be avoided or significantly reduced; (3) preventing significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and (4) disclosing to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.<sup>4</sup>

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<sup>3</sup> CEQA Guidelines, Section, 15161.

<sup>4</sup> CEQA Guidelines, Section 15002; Public Resources Code, sec. 21002.1.

According to CEQA and the State CEQA Guidelines, public agencies must avoid or lessen significant environmental impacts where feasible. Where impacts cannot be mitigated to less than significant levels, public agencies have an obligation to balance a project's significant impacts on the environment against other factors, including economic, social, technological, legal, and other benefits.

After circulating this Recirculated Draft EIR for public comment, the City will respond to written comments. Responses to written comments and any changes to the Draft EIR will be included in a Final EIR. The City must certify the Final EIR before approving the proposed Project. Upon certification, the Final EIR will serve as the base environmental document for the City and will be used as a basis for decisions on implementation of the proposed Project. Other agencies may also use this EIR in their review and approval processes.

This Recirculated Draft EIR was prepared in accordance with Section 15151 of the State CEQA Guidelines, which defines the standards for EIR adequacy as follows:

*An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection; but for adequacy, completeness, and good faith effort at full disclosure.*

## 2.2 SUMMARY OF PUBLIC OUTREACH

As early as 2017, the City partnered with Metro to address the City's critical mobility issues by analyzing viable transit connection options from the Metro K Line to the LASED, which includes SoFi Stadium. With the City's input, Metro conducted a study<sup>5</sup> to explore how best to extend the Metro Rail system via a high-capacity transit connection to the LASED. The Metro study analyzed (1) an interlined operability connection from the Metro K Line in a subway under Prairie Avenue, which also would jointly operate on a portion of the Metro K Line; and (2) operability options for independent services that could provide connections from the Metro Rail system at nearby Metro stations along the Metro K Line to SoFi Stadium. At the conclusion of the study, the City and Metro agreed that the interlined operability scenario is infeasible due to the cost, delay and complexity that would be created on the Metro Rail system. Consistent with Metro's recommendations, the City continued to analyze several independent operability

<sup>5</sup> Los Angeles County Metropolitan Transportation Authority, *City of Champions/Inglewood (NFL) Focused Analysis of Transit Connection (August 2017)*.

transit connections to the City's activity centers. In early 2018, the City also initiated stakeholder outreach to understand the City's need for a comprehensive long-range mobility plan, potential project goals and objectives, potential project benefits and impacts, and stakeholder concerns.

### 2.2.1 July 2018 Notice of Preparation

In July 2018, pursuant to the requirements of the California Environmental Quality Act (CEQA), the City as the Lead Agency prepared a Notice of Preparation (Original NOP) and an Initial Study (Original IS) (SCH 2018071034). The Original IS determined that an Environmental Impact Report (EIR) would be prepared in compliance with CEQA to assess for potentially significant impacts that may result from the Project. The Original NOP and IS were circulated and comments were received from the public and agencies following a 30-day comment period that ended on August 15, 2018.

A scoping meeting was held on July 26, 2018, from 6 PM to 8 PM at the Inglewood Senior Citizens Center, 111 N. Locust Street, Inglewood, CA 90301. Over 80 attendees participated at the public scoping meeting. The City also provided the opportunity for comments to be submitted at the scoping meeting.

### 2.2.2 September 2020 Revised Notice of Preparation

After circulation of the July 2018 Notice of Preparation, the City collaborated with a myriad of key stakeholders, including the City's residential, commercial, and nonprofit stakeholders, and other jurisdictions, including but not limited to the South Bay Cities Council of Governments, Caltrans, Metro, other transit agencies, the City of Los Angeles, the County of Los Angeles, Inglewood Unified School District, adjacent and nearby property owners, tenants and residents, and representatives from the LASED, IBEC, and Forum event venues, and refined the proposed Project. Based on these consultations, the City revised the Project after the Original NOP was issued and prepared; and circulated an updated IS and NOP addressing the revised Project.

As a result of the comments received and refinements and modifications to the proposed Project identified in the Original NOP and Original IS, a Revised NOP and IS were circulated for public review and comment from September 10, 2020 to October 12, 2020 (See **Appendix A**).

The Revised NOP and Revised IS reflected the following refinements and modifications made to the proposed Project:

- Changes to the proposed Project from an approximately 1.8-mile long alignment with 5 stations to an approximately 1.6-mile long alignment with 3 stations. The revised alignment follows the same route as the original alignment from Market Street and Florence Avenue to Manchester Boulevard to Prairie Avenue terminating at the intersection of Prairie Avenue and Hardy Street.

An elevated passenger walkway linkage was added to connect the Market Street/Florence Avenue Station with the Metro K Line on the northside of Florence Avenue.

In addition, the Intermodal Transit Facility (ITF) was removed from the proposed Project; the City proceeded with the ITF project separately and this facility has been completed.

The City submitted both the Original and Revised NOPs and Initial Studies to the Governor's Office of Planning and Research (OPR); applicable trustee or responsible federal, State, regional, and local agencies identified for the proposed Project, including adjacent cities and counties; the County of Los Angeles; relevant Native American tribes; and all interested parties requesting such notice to allow for comment on the IS during the 30-day comment period. The Original and Revised NOP distribution lists indicating the agencies, departments, tribes, and parties that were mailed certified copies of the Original and Revised NOPs is provided in **Appendix A.1: Revised NOP**. In addition, copies of the Original and Revised NOPs and ISs were made available for review at Inglewood City Hall and the Inglewood Public library, as well as on the City's website, to give the public the opportunity to comment during the respective 30-day comment periods.

Based on a preliminary review of the proposed Project as part of the Revised IS, the City determined that potentially significant effects could occur with respect to aesthetics; air quality; biological resources; cultural resources; energy resources; geology and soils; greenhouse gas emissions; hazards and hazardous materials; land use and planning; noise and vibration; transportation and traffic; tribal cultural resources; and utilities and service systems. These issues have been incorporated into the environmental analysis of the proposed Project contained within **Section 4.0: Environmental Impact Analysis** of this Recirculated Draft EIR.

## 2.2.2 Concerns and Issues Raised During Scoping

The CEQA Guidelines require that an EIR summary identify areas of issues raised by other agencies and the public. Issues related to the proposed Project were raised in the comments the City received in response to the Original and Revised NOP and in the comments received on the December 2020 Draft EIR. Comments were received raising issues associated with the proposed alignment of the ATS guideway and locations of the stations. Comments were also received regarding the original proposed location of the MSF on the site of Kelso Elementary School and on the new proposed location on Manchester Boulevard developed with a Vons Grocery store, which would require the closure of this store. The potential for impacts to the community, including businesses located along the proposed alignment during construction was also raised. Comments were also received on the potential for direct and indirect impacts to historic resources located along the proposed alignment in downtown Inglewood. The potential for temporary

impacts to existing transit service during construction was also identified in comments. Utility providers also commented on the potential for the Project to impact existing utilities along the proposed alignment.

## 2.2.3 Tribal Consultation

A part of the AB 52 process, the City notified tribes that may have interest in tribal cultural resources in the region. Four tribes had previously notified the City and requested future notification of, with the possibility of providing consultation on, any projects that proceed under CEQA. These tribes include the Gabrielino-Tongva Tribe, Gabrielino Tongva Indians of California Tribal Council, Gabrielino/Tongva Nation, and the Gabrieleno/Tongva San Gabriel Band of Mission Indians. Additionally, the Gabrieleno Band of Mission Indians-Kizh Nation was identified as a relevant party.

In accordance with AB 52, the City sent notification letters on July 31, 2018 notifying the four tribes identified above that the City was planning the proposed Project. Additionally, the Gabrieleno Band of Mission Indians-Kizh Nation was mailed a Notice of Preparation of this Draft EIR. Each tribe notified has 30 days from receipt of the letter to notify the City that they wish to engage in the AB 52 consultation process on the proposed Project. As of December 6, 2018, the City had received only one response requesting consultation via email from Brandy Salas, Administrative Specialist, for the Gabrieleno Band of Mission Indians-Kizh Nation (Tribe).<sup>6</sup> The Tribe indicated that if there would be any ground disturbance activity associated with the proposed Project, they would like to consult.

Consultation between the Gabrieleno Band of Mission Indians-Kizh Nation Tribe and the City, and the City's consultant team was initiated via conference call on February 6, 2019, and is described further in Chapter 4.4 and in the following appendices:

- *AB 52 Tribal Notification and Outreach Summary Memorandum*, Meridian Consultants LLC, December 6, 2018 (included as **Appendix P.1**); and
- *AB 52 Consultation Summary*, Meridian Consultants LLC, February 6, 2019 (included as **Appendix P.2**).

## 2.2.4 December 2020 Draft EIR

The City prepared and released a Draft EIR for public review in December 2020. Based on additional feedback received during the Draft EIR circulation period the City continued further collaboration with key stakeholders on the design of the Project. City also conducted additional technical analysis and due diligence on potential utility conflicts, property impacts, and potential impacts to historical resources, and refined the project to reduce the project footprint where feasible.

<sup>6</sup> See **Appendix P.1** and its attachments therein of this Draft EIR.

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As a result of this ongoing consultation process, the City has further refined the Project and revised the Draft EIR to evaluate these changes to the Project. The Project remains an approximately 1.6-mile long alignment with 3 stations beginning at the intersection of Market Street and Florence Avenue, continuing along Manchester Avenue and Prairie Avenue, and ending at the intersection of Prairie Avenue and Hardy Street.

The configuration of the Market Street/Florence Avenue Station has been further refined based on coordination with Metro. The connection to the Metro K Line Downtown Inglewood Station and the orientation of the Market Street/Florence Avenue Station have been revised to locate the pedestrian connection on the north side of Florence Avenue. The design of the guideway on Market Street in Downtown Inglewood has also been refined to enhance the compatibility of the Project with existing and planned development along Market Street, including historic buildings, such as the historic Fox Theater. The City has also collaborated with the property and business owners along Market Street to refine the Urban Design Guidelines and Standards to enhance harmony of the surrounding context and align with the City's efforts to help revitalize the downtown Market Street area.

The design of the guideway on Manchester Boulevard has been refined to reduce the need for columns on both sides of the street. The MSF for the system was proposed on Manchester Boulevard between E. Hillcrest Boulevard and E. Spruce Avenue on a site developed with a Vons supermarket. In response to stakeholder concerns about the removal of the local Vons market, the City collaborated with representatives of Vons to develop a refined MSF plan that would allow a new Vons supermarket to remain on this site. The City worked to address the parking, operational and facility needs identified by Vons to keep this grocery store offering high quality healthy food options in the center of the City. The current building on this site contains the Vons store and other businesses.

To address concerns raised by stakeholders, including the Inglewood Unified School District, about station locations, to improve design compatibility, to avoid potential utility conflicts, and to eliminate the need for straddle bent supports, with columns on both sides of the street to support the ATS guideway along Prairie Avenue, the City continued to refine the ITC segment along Prairie Avenue. The locations of the two stations proposed on Prairie Avenue have been updated to complement existing and planned development along Prairie Avenue. The Prairie Avenue/Hardy Station has been relocated to the west of Prairie Avenue with an elevated passenger walkway over Prairie Avenue providing access to the LASED development site. The Prairie Avenue/Pincay Drive Station is no longer planned. This station has been relocated to the west of Prairie Avenue at the intersection of Prairie Avenue and Manchester Boulevard with an elevated passenger walkway over Prairie Avenue to the Forum. The alignment of the guideway on Prairie Avenue has also been revised to reflect the changes to the location of these stations to the west side of Prairie Avenue. As these stations no longer straddle Prairie Avenue, columns supporting these

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stations are no longer required on both sides of Prairie Avenue, allowing greater light and air along Prairie Avenue and allowing for single columns to support the ATS guideway. The columns for the guideway and stations will now only be located on the western side of Prairie Avenue, and both the existing sidewalk and street configuration, including the number of lanes, will continue to be maintained.

### 2.2.5 Public Outreach and Community Engagement

As stated above, the City initiated a comprehensive outreach program for the proposed Project in 2018, at the outset of the environmental clearance phase. As the Draft EIR was prepared, the City continued to keep elected officials, community leaders and the general public informed of the status of the technical analysis and schedule for completion of the environmental documents. The outreach program has been focused on increasing project awareness and education, disseminating project information, garnering public input, and supporting the technical and legal environmental processes. To learn more about the local community's needs for the proposed Project, the City held over 100 community and stakeholder outreach meetings over the past 3.5 years during the planning, environmental and design process.

Stakeholders have included local Inglewood block clubs, neighborhood watch groups and homeownership associations (HOA) such as the Renaissance HOA, Carlton Square HOA, Briarwood HOA, Regent Street HOA, and the Hyde Park Village HOA. The City also engaged the NCAAP Inglewood Chapter, Inglewood Airport Area Chamber of Commerce, Rotary Club of Inglewood, Inglewood Unified School District (IUSD), local churches, and community-based nonprofits including the Social Justice Learning Center Institute, Move LA, The Enrichment Center, and the Coalition for Clean Air. The City has also worked with surrounding jurisdictions, including the City of Los Angeles and County of Los Angeles, conducted industry outreach, and worked with labor and construction trades to help develop a Project Labor Agreement and local hire program.

A complete listing of stakeholders and meetings is included in **Appendix A: Revised NOP and IS** and **Appendix B: Summary of Comments on Revised NOP** of this Recirculated Draft EIR.

Through the use of focus groups, workshops, tours, participation in community events, social media outlets, and webinars, project stakeholders have been involved in each of the major technical milestones of the project development process that has occurred to date.

### Public Engagement Process

The public engagement process included compilation of a stakeholder database, development of project related meeting materials, and collateral materials, and an interactive project website. Proactive outreach, public meetings, participation in community events and coordination meetings with public agencies were also components of the public outreach process.

### Stakeholder Database

To properly inform the public, the City compiled a list of key individuals located throughout and adjacent to the proposed Project and public agencies that have jurisdiction in the area. In addition to key individuals and/or groups identified as part of the initial due diligence, the database includes a listing of all stakeholders who have attended public meetings, participated in a key stakeholder meeting, community events or who have otherwise asked to be added to the database. It is used to notify stakeholders of public meetings, to send out the electronic Newsletter, or other updates as needed. The stakeholder database includes the following groups and individuals:

#### City Council

- Mayor James T. Butts, Jr.
- Councilman George W. Dotson, District No. 1
- Councilman Alex Padilla, District No. 2
- Councilman Eloy Morales, Jr., District No. 3
- Councilman Ralph Franklin, District No. 4

#### City Commissions

- Parking & Traffic Commission
- Parking Authority
- Park & Recreation Commission
- Planning Commission
- Senior Center Advisory Committee
- South Bay Cities Service Council
- Citizen Advisory Committee
- Community Development Committee
- Inglewood Housing Authority – RAB Committee

#### Community Based Organizations and Religious Community Institutions

- Inglewood Teen Center
- Lockhaven Community Center
- Social Justice Learning Center Institute
- The Enrichment Center
- Amassi Center
- Briarwood Community Center
- Inglewood Cultural Arts Center
- Uplift Inglewood Coalition
- Inglewood Forward
- We Can Help Foundation Inc.
- Great Beginnings for Black Babies, Inc.
- American Legion
- Women Infant Children (WIC) Inglewood Chapter
- South Bay Workforce Investment Board

- Faithful Central Bible Church
- Inglewood Ministerial Alliance
- Brotherhood Crusade
- Inglewood Community Church
- Christ Centered Ministries
- Coalition for Clean Air
- Champions for Progress
- St. John Chrysostom Church
- Van Wick Block Club Community Groups
- Holly Park Knolls Homeowners Association
- Briarwood Homeowners Association
- Carlton Square Homeowners Association
- Rotary Club of Inglewood
- Inglewood Around the Block Club
- Inglewood Cultural Arts Center
- Renaissance Homeowners Association
- St John Chrysostom Church
- Inglewood Chamber of Commerce
- LAX Coastal Chamber of Commerce
- Thomas Safran & Associates
- Hilltop Coffee + Kitchen
- Aero Collective
- Fast Signs
- Glaser Well
- Jamz Creamery
- Three Weavers Brewery
- Toragrafix
- WLM Financial
- Miracle Theater
- A Toast to Artistry
- Eye on Inglewood
- The Samiche Shoppe
- R.Hickes Realty

#### Transit Advocacy Groups

- LA County Bicycle Coalition
- Alliance for Community Transit LA
- Southern California Transit Advocates
- Cherrywood-Leimert Block Club
- Empowerment Congress West
- Move LA

**Local and Regional Agencies**

- Inglewood Unified School District
- Los Angeles County Metropolitan Transportation Agency
- Southern California Association of Governments
- South Bay Cities Council of Government
- Los Angeles World Airport
- University of California, Los Angeles
- Los Angeles/Orange Counties Building and Construction Trades Council

**Regional Stakeholders**

- A.G. Spanos, Los Angeles Chargers, President of Los Angeles Chargers
- Kevin Demoff, Los Angeles Rams, Chief Operating Officer and Executive Vice President
- Steve Ballmer, Chairman, Los Angeles Clippers
- Stadco LA, LLC, SoFi Stadium Owner
- University of California, Los Angeles
- Los Angeles/Orange Counties Building and Construction Trades Council
- Southwest Regional Council of Carpenters
- Los Angeles Cleantech (LACI)
- The Inglewood Airport Area Chamber of Commerce
- LAX Coastal Chamber of Commerce
- National Association for the Advancement of Colored People
- Ironworkers Local 433 – International Association of Bridge, Structural & Ornamental Iron Workers A.F.L – C.I.O
- Los Angeles Conservancy
- California Public Utilities Commission

**Other Public Officials<sup>7</sup>**

- U.S. Senator Dianne Feinstein
- U.S. Senator Alex Padilla
- U.S. Representative Maxine Waters
- California Assemblymember Autumn Burke
- California Assemblymember Sydney Kamlager
- California Assemblymember Tom Lackey
- California Senator Steven C. Bradford
- Secretary of the California State Transportation Agency, David S. Kim
- Executive Director of California Transportation Commission, Hilary Norton
- Director of the Department of Transportation (Caltrans), Toks Omishakin
- Director of Caltrans District 7 Director, Tony Tavares
- Los Angeles County Supervisor Janice Hahn

<sup>7</sup> Note: It is envisioned that these public officials would be contacted and briefed by the City and/or the outreach team in connection with the Inglewood Transit Connector project. At those meetings, information can also be provided on shorter-range planning efforts, which would include the TMOP.

- Los Angeles County Supervisor Hilda L. Solis
- Los Angeles City Councilmember Herb J. Wesson, Jr.
- Los Angeles Mayor Eric Garcetti
- City of El Segundo Mayor Drew Boyles
- City of Carson Mayor Cedric L. Hicks
- Casey Wasserman (Los Angeles Olympics 2028 Committee Chairperson)
- Los Angeles County Supervisor Holly Mitchell
- California Senator Maria Elena Durazo

**Project Materials and Resources**

To inform and update stakeholders about the proposed Project's progress, the outreach team developed collateral materials for distribution through various channels and means of communication. These included project related fact sheets, frequently asked questions, meeting notices, electronic newsletters/e-bulletins, and other collateral materials. In addition, a complete set of collateral pieces was developed and distributed at community meetings, stakeholder briefings, and public events, as well as electronically when requested. These collateral materials were updated throughout the proposed Project's development process and were produced in English and Spanish.

The City's project website served as the central point where stakeholders went to obtain a variety of information about the proposed Project. The website is located at:

<http://envisioninglewood.org/transportation-solutions/inglewood-transit-connector/>

The website contains maps of the proposed Project, and other collateral materials and key documentation such as the NOP, Initial Study Report, the Recirculated Draft Environmental Impact Report, planning workshops and working group presentations. The website also contains a "Contact Us" sections where people can provide their input to the study, ask questions, and add themselves to the proposed Project database to be notified of future meetings and project related updates.

**2.2.6 Post Scoping Outreach****General Public**

The City held over 100 community and stakeholder outreach meetings over the past 3.5 years during the planning, environmental review, and design process. Stakeholders have included property and landowners adjacent to the proposed Project including but not limited to business and property owners along Market Street, Stadco LA, LLC (SoFi Stadium Owner), Steve Ballmer (owner of the Forum and proposed Inglewood Basketball and Entertainment Center), the Rams and the Chargers. The City also engaged with local Inglewood block clubs, neighborhood watch groups and HOAs such as the Renaissance HOA, Carlton Square HOA, Briarwood HOA, Regent Street HOA, and the Hyde Park Village HOA. The City

also presented at local community groups and organizations including but not limited to the NCAAP Inglewood Chapter, Inglewood Airport Area Chamber of Commerce, Rotary Club of Inglewood, Inglewood Unified School District, local churches, and community-based nonprofits including the Social Justice Learning Center Institute, Move LA, The Enrichment Center, and the Coalition for Clean Air.

At the meetings, residents expressed significant interest in and support for the proposed Project. The overarching themes summarized below emerged as priority interests and needs the community would like to see addressed by the proposed Project, including but not limited to creating economic development opportunities along the corridor, specifically Downtown Inglewood; increasing transit options for local residents and visitors; connecting communities and residents to jobs and educational opportunities, services and destinations locally and regionally; reducing traffic congestion and the growing demand on the existing roadway networks on both event and nonevent days; providing a transit system that preserves existing traffic lanes along Prairie Avenue and Manchester Avenue for vehicular traffic; reducing potential impacts to local businesses during construction; ensuring stations are designed to promote safety, and be easy to access for multiple modes including pedestrians, bicyclists, and park-and-ride users. The City has embraced the stakeholder input received to date and addressed various community needs identified into the design of the proposed Project, including supporting TOD development in Downtown Inglewood, a direct transit connection to the Metro K Line, a fully elevated transit system that does not remove any existing vehicular travel lanes, a phased construction approach focused on helping local businesses, and designed state-of-the-art stations integrated into its surrounding environment. The City will continue to host public workshops, design charettes and stakeholder meetings throughout the CEQA, design, procurement, construction and project implementation process.

The City received a state funding allocation of \$8.5 million to launch a comprehensive revitalization program of Downtown Inglewood including streetscape improvements along Market Street between Florence Avenue and Hillcrest Boulevard, a façade and tenant improvement program, and revitalization of the Fox Theatre. Through these renovation efforts, the City plans to help spur private investment into Downtown Inglewood, help attract new tenants into vacant commercial spaces, and help boost the City’s local economy. In addition, the City has secured approximately \$19 million congressionally directed funding for the ITC Project from Congresswoman Maxine Waters and US Senator Alex Padilla..

**Public Agency**

In addition to the scoping meeting, the City also participated in various meetings with public agencies to allow concerns to be identified and addressed early in the development process of the proposed Project. This effort was designed to present information on the proposed Project’s concept design, to discuss relevant issues related to each agency’s jurisdiction and proactively consult with these agencies prior to formal agency consultation. Agencies involved in these meetings are list in **Table 2.0-3: Post Scoping Public Agency Outreach**.

**Table 2.0-3  
Post Scoping Public Agency Outreach**

Agency/Entity/Individual	Summer 2018	Spring 2019	Winter 2019	Summer 2020	Winter 2020	Summer 2021
Los Angeles Department of Transportation	X	X	X	X	X	
City of Hawthorne		X	X		X	X
City of Lawndale	X	X	X		X	
South Bay Council of Governments	X	X	X	X	X	X
Los Angeles County, Public Works Department	X	X	X			
Los Angeles County Metropolitan Transportation Authority	X	X	X	X	X	X
Santa Monica Big Blue Bus	X	X	X	X	X	X
City of Gardena – GTrans	X	X	X	X	X	X
City of Santa Monica – Big Blue Bus	X	X	X	X	X	X
City of Culver City – Culver City Bus	X	X	X	X	X	X
City of Redondo Beach – Beach Cities Transit	X	X	X	X	X	X
City of Long Beach Transit		X	X		X	X
Inglewood Unified School District			X		X	X
Los Angeles County Fire Department				X	X	X
California Department of Transportation (Caltrans)	X	X	X	X	X	X
South Coast Air Quality Management District (SCAQMD)	X	X	X	X		

In addition to the outreach conducted as part of the environmental review process the City is conducting to comply with CEQA, the City is also coordinating with the Federal Transportation Agency (FTA) and environmental review of the Project in conformance with the National Environmental Quality Act (NEPA) has also been initiated by the FTA.

**2.3 ORGANIZATION OF THIS RECIRCULATED DRAFT EIR**

This Recirculated Draft EIR is organized as follows:

**Section 1.0: Executive Summary** provides a summary of the proposed Project. This chapter includes an overview of the proposed Project description and areas of controversy, a discussion of key environmental effects, a discussion of significant and unavoidable impacts, a discussion of cumulative effects, an overview

## 2.0 Introduction

of alternatives, and a summary table that includes each environmental impact, level of impact, and all applicable mitigation measures.

**Section 2.0: Introduction** provides information on the background of the proposed Project, the environmental review process, and organization of the Recirculated Draft EIR, and describes the existing physical setting of the proposed Project and the surrounding area.

**Section 3.0: Description of the Proposed Project** presents a description of the proposed Project that addresses its location, the objectives, and the approvals being requested from the City.

**Section 4.0: Environmental Impact Analysis** contains information and analysis of the potential for the proposed Project to result in significant environmental effects for each of the following topics evaluated in this Recirculated Draft EIR:

- **Section 4.1: Aesthetics**
- **Section 4.2: Air Quality**
- **Section 4.3: Biological Resources**
- **Section 4.4: Cultural Resources**
- **Section 4.5: Energy Resources**
- **Section 4.6: Geology and Soils**
- **Section 4.7: Greenhouse Gas Emissions**
- **Section 4.8: Hazards and Hazardous Materials**
- **Section 4.9: Land Use and Planning**
- **Section 4.10: Noise and Vibration**
- **Section 4.11: Population, Employment, and Housing**
- **Section 4.12: Transportation**
- **Section 4.13: Tribal Cultural Resources**
- **Section 4.14: Utilities and Service Systems**

**Section 5.0: Alternatives** discusses alternatives to the proposed Project that have been developed and analyzed to provide additional information on ways to avoid or lessen the impacts of the proposed Project. The alternatives include the “No Project Alternative” as required by the CEQA Guidelines along with other alternatives.

**Section 6.0: Other Environmental Considerations** is divided into five subsections.

- **Section 6.1: Introduction;**
- **Section 6.2: Significant Unavoidable Impacts;**
- **Section 6.3: Significant Irreversible Environmental Changes** discusses the significant irreversible and irretrievable commitment of resources associated with the implementation of the proposed Project;
- **Section 6.4: Effects Found Not to Be Significant** discusses the potential impacts of the proposed Project that were determined not to be significant and were therefore not discussed in detail in this Recirculated Draft EIR; and
- **6.5: Growth Inducing Effects.**

## 2.0 Introduction

**Section 7.0: List of Preparers, Organizations and Persons Consulted, and Parties to Whom Sent** lists persons involved in the preparation of this Recirculated Draft EIR or who contributed information incorporated into this Recirculated Draft EIR.

**Section 8.0: List of Terms, Definitions, and Acronyms** includes specifically defined term, definitions, and acronyms used throughout this Recirculated Draft EIR.

**Section 9.0: List of References** includes the principal documents, reports, maps, and other information sources referenced in this Recirculated Draft EIR.

**Appendices** to this Recirculated Draft EIR include technical information and other materials prepared for this Recirculated Draft EIR and the City’s environmental review of the proposed Project.

## 2.4 PUBLIC REVIEW OF THE RECIRCULATED DRAFT EIR

The Recirculated Draft EIR is available for public review and comment beginning November 12, 2021 and concluding at 5 PM on December 27, 2021. The Recirculated Draft EIR is available for review at the following locations:

- City of Inglewood website at:  
<https://www.cityofinglewood.org/1016/Environmental-Documents>

During the review and comment period, written comments on the Recirculated Draft EIR may be submitted to Ms. Mindy Wilcox, AICP, Planning Manager, at the following:

By mail:

City of Inglewood  
Planning Division  
One W. Manchester Boulevard, 4th Floor  
Inglewood, CA 90301

By email: [inglewoodtransitconnector@cityofinglewood.org](mailto:inglewoodtransitconnector@cityofinglewood.org)

In accordance with CEQA Guidelines the City will be providing written responses to comments on this Recirculated Draft EIR in the Final EIR. Comments submitted on the December 2020 Draft EIR will be included in the administrative record for the Project. The City will not be providing written responses to comments submitted on the December 2020 Draft EIR in the Final EIR as permitted by Section 15088.5 (f) (1) of the CEQA Guidelines and is requesting that all parties submit new comments on this Recirculated Draft EIR.

### 3.0 PROJECT DESCRIPTION

#### 3.1 BACKGROUND

The City of Inglewood (City) is undergoing a historic transformation into a world-class sports and entertainment destination and a major employment center within the greater Los Angeles region. First, in 2012, over \$100 million was invested in the Forum, making it one of the largest indoor concert venues and host of some of the largest entertainment acts in the country. Next, the redevelopment of approximately 298 acres at Hollywood Park includes thousands of new residential units and millions of square feet (SF) of commercial and recreational uses as part of the Los Angeles Stadium and Entertainment District (LASED) project. At the centerpiece of the LASED is the new \$5 billion-dollar, 70,240-seat SoFi Stadium shared by the Los Angeles Rams and Los Angeles Chargers. SoFi Stadium will host Super Bowl LVI in Winter 2022, and the 2028 Summer Olympic Games with the possibility of hosting many more events. In August 2020, the City approved the Inglewood Basketball and Entertainment Center (IBEC), which will be home to the Los Angeles Clippers of the National Basketball Association (NBA) and includes the team's arena, headquarters, and training facilities. There are other exciting developments in the City including housing, office, retail commercial and hotel projects under construction and in the application pipeline. Additionally, the new Los Angeles Philharmonic music and cultural campus for the Youth Orchestra Los Angeles (YOLA) facility, designed by architect Frank Gehry near Inglewood City Hall opened in September 2021.

Pivotal to the City's transformation is the new 8.5-mile Los Angeles County Metropolitan Transportation Authority (Metro) K (Crenshaw/LAX) Line. Scheduled to begin service in late 2021, the Metro K Line will enhance transit access to the City and include stations at Aviation/Century, Westchester/Veterans, Downtown Inglewood, Fairview Heights, Hyde Park, Leimert Park, MLK Jr., and Expo/Crenshaw. It will extend light-rail transit from the existing Metro E (Expo) Line station at Crenshaw/Exposition Boulevards to the Metro C (Green) Line station at Aviation/Century Boulevards and provide a transit connection to Los Angeles International Airport (LAX) via the Los Angeles World Airports automated people mover project, currently under construction. Upon completion of the Metro K Line, patrons who wish to use the Metro rail system to travel to events at the Forum, LASED including SoFi Stadium, the IBEC, or other existing and future commercial areas and residences in the City would face a "last-mile" gap of approximately 1.5 to 2 miles between the Metro K Line and the City's new activity centers. This gap is longer than a convenient walking distance for patrons traveling to the City's activity centers.

In response to the anticipated increases in traffic associated with these new sports and entertainment venues, the City is updating its Mobility Plan, developing a Stadium Events Transportation Management and Operations Plan (TMOP), working with transit agencies to improve transit operations to the City given

existing limited service, creating an off-site satellite parking program with event shuttle service, installing a comprehensive intelligent transportation system, and implementing a City-wide permit parking program to protect neighborhoods. The physical capacity of the existing local and regional roadway network may still challenge the ability of residents and visitors to access the City's amenities easily in the future. Bus transit, shuttles, and other alternative modes still compete with existing traffic on the City's roadway network.

As Inglewood transforms into a major regional housing, employment and activity center, the number of vehicular trips associated with new jobs, retail, entertainment, and residential opportunities is anticipated to increase. Based on historic traffic counts, traffic volumes have been increasing at the rate of 1.5 percent per year, and many key intersections and highway corridors already experience congestion. According to the Southern California Association of Government's (SCAG) *Connect SoCal - 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)* Demographics and Growth Forecast, substantial socioeconomic and demographic growth is projected in the region. The City is projected to be one of the highest growing housing and employment centers in Los Angeles County, with growth rates of approximately 20 percent in population, 27 percent in number of households, and 36 percent in employment from 2016 to 2045.<sup>1</sup>

The City proposes the Inglewood Transit Connector Project (ITC or proposed Project) to extend service from the Metro K Line to the City's activity centers. The ITC is a 1.6-mile, three station, fully elevated, electrically powered Automated Transit System (ATS system) that will connect directly to the Metro K Line Downtown Inglewood Station. On March 29, 2021, Metro's Board of Directors approved and voted to form a Joint Powers Authority (JPA) with the City of Inglewood to help extend mass transit from the Metro K line at the Metro Downtown Inglewood Station to the City's sports and entertainment areas, and to help lend its partnership and expertise to assist with the design, construction and financing, and operation and maintenance of this 1.6-mile ATS system to extend service from the K Line. Metro recognizes the increase in ridership on the K line that will be created by the proposed ITC Project and is now working collaboratively with the City on all aspects of the project to extend service from the K line to the City's major employment, housing, commercial and entertainment centers.

Over 80 percent of the Project corridor (defined as the area within ½ mile of the proposed Project stations) is located within census tracts ranked in the top 25 percent of census tracts in California with the highest

<sup>1</sup> SCAG. 2020-2045 RTP/SCS - ConnectSoCal. *Demographics and Growth Forecast*. [https://www.connectsocial.org/Documents/Adopted/fConnectSoCal\\_Demographics-And-Growth-Forecast.pdf](https://www.connectsocial.org/Documents/Adopted/fConnectSoCal_Demographics-And-Growth-Forecast.pdf). September 1, 2020.

### 3.0 Project Description

pollution burden and socioeconomic vulnerabilities based on the CalEnviroScreen Model<sup>2</sup> The proposed Project will offer the community a new transit connection to the Metro Rail system and regional employment opportunities including those at LAX. The Project would also ensure that long-time residents, employees, and business are provided a direct connection to the Metro Rail system while also providing visitors with a seamless connection to event venues, which, in turn, would assist Inglewood's transformation into a world-class city.

The City proposes the Project to address projected future congestion, improve overall mobility and levels of service, and advance its sustainability goals. Providing transit access to the City's activity centers would advance local and regional goals to increase transportation choice, significantly reduce greenhouse gas (GHG) emissions, improve air quality and human health, reduce per-capita vehicle miles traveled (VMT), reduce the growth of congestion on local and regional roads, and encourage sustainable development patterns. The City recognizes that an efficient and effective transportation network is essential to achieving the full benefits of ongoing and widespread investment. The proposed Project is designed to support the City's growth by serving an annual ridership of 13.9 million by 2076, reducing over 2.3 billion VMT by 2076, and improving air quality throughout the South Coast Air Basin by reducing GHG emissions by approximately 768,922 metric tons of carbon dioxide equivalent (MTCO<sub>2e</sub>) over the life of the Project.

## 3.2 ITC PROJECT OVERVIEW

The proposed ATS would include an approximately 1.6-mile long, elevated, guideway located within current and to-be-acquired public right-of-way along Market Street, Manchester Boulevard, and Prairie Avenue. Three stations are proposed adjacent to the guideway on privately owned land that is proposed to be acquired as part of the Project. The elevated guideway will contain dual lanes to allow trains to travel continuously in each direction. Several trains would likely be operating at the same time, depending on ridership demand.

As part of the City's collaboration and partnership with Metro, the Project is proposed as an extension of the Metro regional rail system to the City's activity centers, closing the critical first/last mile transit gap in Inglewood, increasing passenger service along the Metro system by facilitating a seamless transfer of passengers between the ITC and the Metro K Line.

The ATS technology may be a self-propelled technology, including, rubber-tire ATS systems, monorails, large steel-wheel ATS systems, also known as automated light rail transit (ALRT) or a cable propelled ATS system. The system will be fully automated (i.e., driverless) to operate at the headways to meet the

<sup>2</sup> California Office of Environmental Health and Hazard Assessment (OEHHA), CalEnviroScreen. <https://oehha.ca.gov/calenviroscreen>.

### 3.0 Project Description

projected peak ridership needs. The vehicles are smaller than traditional heavy rail technology and can maneuver the tight curves required for the site-specific conditions. This type of technology is often times also referred to as automated guideway transit, automated people mover or simply monorail; regardless of the terminology used in the industry, it is a form of a light rail technology without an overhead catenary.

The ATS trains will operate in a pinched-loop mode on dual tracks along the alignment, wherein trains follow each other and switch back at the end-of-line stations to make the return journey on the other track. As planned, the trains can be operated in multiple different configurations, ranging from a one-car train to multiple-car length trains with a maximum train length of approximately 200 feet. Depending on the technology (self-propelled or cable propelled), ridership demands, which will be time of day and event day dependent, multiple trains of up to the maximum train length can be operated at varying headways for self-propelled systems, as close as 1.5 minutes apart, to provide the necessary peak and reserve capacity.

Cable-propelled technologies have several operational differences from self-propelled ATS systems. Because these systems have traditionally been limited to only one train at a time (per guideway lane) located between any pair of stations, the minimum operational headway is controlled by the longest trip time between stations. It is estimated that the minimum operational headway for cable propelled ATS technology would be approximately 3.9 minutes, controlled by the trip time between Market Street/Florence Avenue and Prairie Avenue/Manchester Boulevard stations. Use of larger vehicles, innovations, and other technological advancements in cable-propelled ATS technologies may allow these technologies to satisfy demands.

Scenarios for ridership demand, operating strategies and resultant capacities for self-propelled technologies are provided in **Table 3.0-3: Peak Period Ridership Headway Fleet Capacity**.

Three stations are proposed on private property proposed for acquisition as part of the Project. These stations are:

- The *Market Street/Florence Avenue* station generally located between Market Street and Locust Street providing connections to the Metro K Line and Downtown Inglewood;
- The *Prairie Avenue/Manchester Boulevard* station located on the southwest corner of the intersection of Prairie Avenue and Manchester Boulevard providing service to the Forum and the LASED at Hollywood Park including SoFi Stadium and existing and future local businesses and residences.
- The *Prairie Avenue/Hardy Street* station located on the northwest corner of the intersection of Prairie Avenue and Hardy Street providing service to the LASED at Hollywood Park, including SoFi Stadium, the IBEC, and other existing and future local businesses and residences.

### 3.0 Project Description

These station locations were chosen to be near major employment, housing, and retail centers, including the Forum, the LASED, including SoFi Stadium, and other employment, housing and retail commercial uses in the Hollywood Park Specific Plan (HPSP), the IBEC, and employment, housing and retail commercial uses in Downtown Inglewood, which the City is seeking to enhance and activate.

Existing roadways and infrastructure along the transit alignment will require reconfiguration to accommodate the new elevated transit guideway structures and stations. In addition to surface improvements, utility infrastructure located under roadways may need to be relocated to accommodate the guideway columns, footings, and other components. The roadway reconfigurations proposed along Market Street, Manchester Boulevard, and Prairie Avenue are necessary to assure that the existing roadway travel capacity is not reduced to accommodate the proposed Project.

The proposed Project includes a Maintenance and Storage Facility (MSF) to provide regular and preventive maintenance for the ATS trains, vehicle storage, and an operations control center. **Figure 3.0-3: Vicinity Map** identifies the proposed location of the MSF on the eastern half of the block bound by Manchester Boulevard, Hillcrest Boulevard, Nutwood Street and Spruce Avenue. An existing commercial building containing a Vons grocery store, a fitness center, and a bank branch, is located on the southern portion of this site. A gas station operated by Vons is located on the northeast portion of this site. Demolition of the existing commercial building and gas station are proposed as part of the Project. A new Vons replacement store is proposed on the corner of Manchester Boulevard and Hillcrest Boulevard.

The MSF will be designed in accordance with the Inglewood Transit Connector (ITC) Design Standards and Guidelines (Design Guidelines) (see *section 3.5.8*) which address the massing, façade, materials, colors, roof, and lighting for this facility, how the MSF will engage with the passenger and vehicular circulation around it, and sustainability features (see **Appendix C: ITC Design Standards and Guidelines**). The proposed Project also includes two power distribution system (PDS) substations. These PDS substations will provide the necessary power for the proposed Project including traction power, auxiliary power, and housekeeping power for the stations and related infrastructure. One of the PDS substations will be located on the MSF site, where the Southern California Edison (SCE) service connection will be provided. The second PDS substation will be located on the Prairie Avenue/Hardy Street station site.

Additional public parking would be provided as part of the Project at three locations that are proposed for acquisition for use as construction staging areas. After construction, these sites will be improved as public parking lots:

- Approximately 650 parking spaces would be provided in a surface parking lot at the Market Street/Florence Avenue Station along with pick-up and drop-off areas on Locust Avenue and Regent Street.
- Approximately 50 parking spaces would be provided in a surface parking lot at 150 S. Market Street.

### 3.0 Project Description

- Approximately 80 parking spaces and a shuttle bus pick-up and drop-off area are proposed at the Prairie Avenue/Hardy Street Station. This lot would be used for public parking, TNCs and shuttle bus pick-up and drop-off operations during events.

These parking areas will provide public parking needed in the City to support use of the ITC Project, businesses, and the City's efforts to help revitalize the historic retail areas along Market Street. The ITC Project is designed and intended to extend the transit service provided by the Metro K Line to the major event venues and existing and planned residential and commercial uses in the City, and these parking facilities are proposed to support transit use. On non-event days, the parking is designed to allow the City's residents to become transit riders and use the Metro Rail system, providing local convenient parking adjacent to the ITC and Metro K Line. On event days, the City recognizes that many visitors may still drive to the City in search of convenient parking with proximity to commercial uses and access to a direct transportation connection to the City's major event venues. To help with overall traffic congestion and improve circulation on local streets, and to help reduce visitors parking in residential areas, the City proposes to provide parking in close proximity to the ITC Project stations and downtown Market Street area. These parking areas will also provide replacement parking for public parking on streets that may be removed as part of the ITC Project.

In addition, the City is considering building a parking structure on the City's Inglewood Transit Facility (ITF) site located on the southeast corner of Prairie Avenue and Arbor Vitae Street within the HPSP area. This parking structure would provide additional public parking near event venues in the LASED and for the IBEC. The ITF site is currently improved as a surface parking lot and bus transit facility. This potential parking structure would provide up to 2,500 parking spaces in a six-level building.

While this proposed parking facility would be located within the HPSP area and is not proposed as part of the Project, it is analyzed herein as part of the potential circulation system in which the Project will operate.

### 3.3 PROJECT LOCATION

The proposed Project is located in the central and northern portions of the City, east of the San Diego Freeway (I-405) and north of the Glenn Anderson Freeway (I-105) in Los Angeles County, California, as shown in **Figure 3.0-1: Regional Location**.

The Project would be constructed in an area generally bounded by the Metro K Line to the north; Hardy Street to the south; the LASED at Hollywood Park including SoFi stadium, and the Forum to the east; and La Brea Avenue to the west, as shown in **Figure 3.0-2: Project Location Map**. The Project extends from the Metro K Line Downtown Inglewood station southwest of the intersection of Market Street and Regent Street, continues south on Market Street, east on Manchester Boulevard, and south on Prairie Avenue to Hardy Street, as shown in **Figure 3.0-3: Project Vicinity Map**.



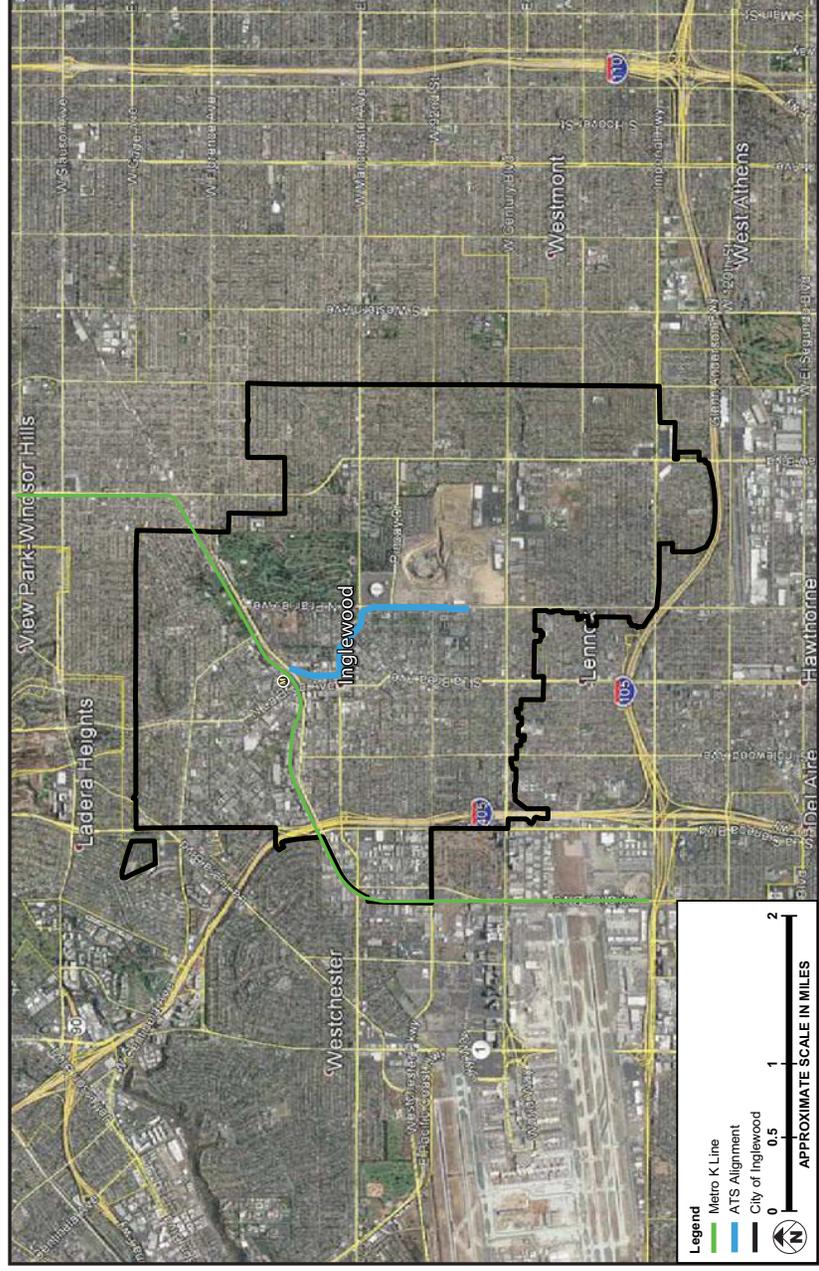
SOURCE: Google Earth - 2021



251-003-20

FIGURE 3.0-1

Project Regional Location Map



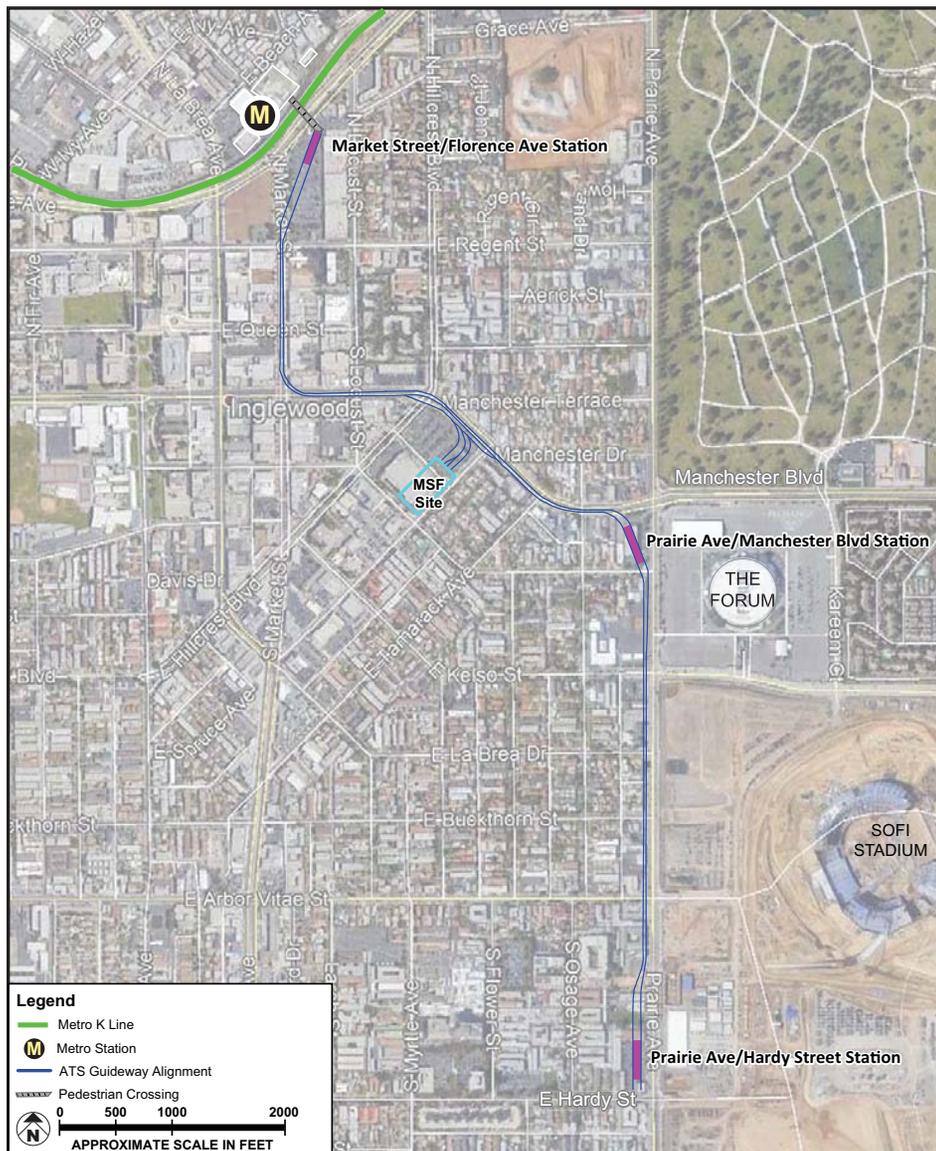
SOURCE: Google Earth - 2021; Meridian Consultants - 2021



251-003-20

FIGURE 3.0-2

Project Location Map



SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021

Illustrative and subject to adjustments as part of finalization during final design

FIGURE 3.0-3



Project Vicinity Map

251-003-20

The elevated guideway will be primarily located within the public rights-of-way for the streets and sidewalk areas along Market Street, Manchester Boulevard, and the west side Prairie Avenue with some limited encroachments on currently private property located adjacent to the public right of way for vertical circulation features, such as stairways. The three proposed stations and the portions of the guideway connecting to these stations are proposed to be located adjacent to the existing public right-of-way on private properties proposed for acquisition by the City by either voluntary agreements or through eminent domain. Additionally, the MSF site is proposed to be located on currently private property requiring a combination of a partial acquisition and an easement, as described further below.

### 3.4 PROJECT OBJECTIVES

Section 15124(b) of the State CEQA Guidelines states that the Project Description shall contain “[a] statement of the objectives sought by the proposed project.” In addition, Section 15124(b) of the State CEQA Guidelines further states, “[t]he statement of objectives should include the underlying purpose of the project.”

The City’s goals and objectives for the proposed Project are as follows:

- Provide a direct and convenient extension of the Metro regional transit system for local residents and the region to access the City’s new major housing, employment, commercial, and activity centers;
- Close the “last mile gap” to the regional transit system by providing passengers with the ability to transfer to or from destinations and the Metro K Line.
- Provide sufficient transit connection capacity between the Metro regional transit system and the City’s major activity centers with enhanced travel time certainty and sufficient capacity to meet peak ridership demands to encourage transit as a travel mode choice;
- Maintain existing roadway capacity to the extent feasible;
- Reduce the City’s traffic congestion and alleviate growing demand on the existing roadway network on both major arterials and residential streets for both nonevent and event days;
- Encourage intermodal transportation systems by providing convenient, reliable time-certain transit;
- Increase transit mode split, reduce vehicle trips, and reduce per-capita vehicle miles traveled to the City’s major activity centers, with corresponding improvements in air quality, public health, and reductions in greenhouse gas emissions from transportation sources in accordance with the City’s goals, the SCAG 2020-2045 RTP/SCS, and State policies with respect to climate change and land use.
- Support the ongoing economic revitalization and growth opportunities for transit-oriented development (TOD) within the Downtown TOD Plan area, including commercial and residential uses, including through the creation of public parking facilities;
- Encourage redevelopment and investment within the City in areas served by the proposed Project;

### 3.0 Project Description

- Provide safe, reliable, and convenient access to businesses in the City so that they are accessible to their workforce and customers;
- Connect the Inglewood community and citizens to jobs, education, services, and destinations within the City and in the region by providing transit within safe and accessible walking distances; and
- Support regional efforts to become more efficient, economically strong, equitable, and sustainable.

### 3.5 PROJECT CHARACTERISTICS

The Project Description and analysis in this EIR are based on the Conceptual Plans for the ITC Project.<sup>3</sup> The Conceptual Plans identify the proposed alignment for the ATS, which is proposed to be predominantly constructed in the public right-of-way to be acquired for the Project, with the three stations and MSF proposed on private property proposed for acquisition as part of the Project located adjacent to the public right-of-way as described further below. These Conceptual Plans will likely be refined as design of the Project progresses; however, for purposes of the analysis in this Recirculated Draft EIR, the Conceptual Plans, including, among other things, the ATS Guideway, columns, and other components of the Project, are analyzed to disclose the potential maximum impacts of the Project.

The location, layout, and size of the proposed stations, PDS substations, and MSF as illustrated in the Conceptual Plans represent the potential maximum size of these facilities for the purpose of analyzing the potential impacts of the Project. The description of the proposed changes to streets described in this section are also illustrative and identify the potential maximum extent of changes to existing streets proposed as part of the Project. Engineering and design-level details of the Project will be refined as the Project moves through the environmental review, approval, procurement, and design phases.

Components of the Project include:

- ATS trains operating on an elevated dual-lane guideway with three stations;
- ATS guideway along Prairie Avenue to be constructed on the west side of Prairie Avenue;
- No more than three straddle bents all north of Pincay Street along Prairie Avenue immediately south of the Prairie Avenue/Manchester Boulevard Station;
- Passenger walkway systems connecting the stations to the street, mezzanine areas, escalators, and elevators;
- Storage space, operations space, and communications systems located within stations;
- Wayfinding signs and communication program;

<sup>3</sup> Lea+Elliott, Inc. *Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition August 2021. (Appendix E)*

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- An MSF to provide regular and preventive maintenance of the ATS trains and equipment, as well as space for storage of the vehicle fleet and the operations control center, among other functions;
- PDS substations located on the MSF and the Prairie Avenue/Hardy Street station sites to provide traction/propulsion power, auxiliary power, and housekeeping power;
- Utilities infrastructure—new, modified and/or relocated—to support the proposed Project;
- Surface public parking lots located at the Market Street/Florence Avenue and Prairie Avenue/Hardy Street stations containing multimodal pick-up and drop-off areas, and at 150 S. Market Street to support Downtown Inglewood; and
- Roadway, traffic devices, and streetscape modifications and improvements to accommodate the guideway alignment and support structures.

**Table 3.0-1: ITC Project Component Locations and Sizes** provides information on the components of the proposed Project.

**Figure 3.0-4a to 3.0-4i: Proposed Project Alignment Plans and Profiles** shows the proposed alignment through the City and the locations of the three proposed stations and MSF. 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 the west side of Prairie Avenue for approximately 0.75 miles ending north of Century Boulevard at Hardy Street. The alignment profile was developed to provide a minimum clearance of 16 feet 6 inches above all roadways. The height of the guideway is dictated by the elevations at the stations and the existing grades, which vary along the alignment. Additional alignment profile provisions have been made to preserve views of the historic Fox Theater Building on Market Street and other historic structures on Market Street.

The Market Street/Florence Avenue station is proposed on Market Street, just south of Florence Avenue, to provide a connection to and extension of the future Metro K Line Downtown Inglewood Station on Florence Avenue. The two proposed stations located along Prairie Avenue – the Prairie Avenue/Manchester Boulevard and Prairie Avenue/Hardy Street stations – would be located on the west side of Prairie Avenue to allow for the majority of the guideway to be supported by single columns to minimize the visual impact to surrounding properties and to keep the entire length of Prairie Avenue open to the sky.

The proposed Project will be a pinched-loop system, with ATS trains operating back and forth from the Market Street/Florence Avenue station to the Prairie Avenue/Hardy Street station, stopping at each station along the way and reversing at the end of the system. Trains will crossover to the adjacent guideway prior to entering the Market Street/Florence Avenue station and reverse direction when leaving the station. At the Prairie Avenue/Hardy Street station, trains will also crossover prior to entering the

station and reverse direction when leaving the station. Where possible, the dual tracks are narrowed and configured to facilitate the use of single columns to support the structure, thus minimizing the infrastructure needs.

**Table 3.0-1  
ITC Project Component Locations and Sizes (Conceptual)**

Project Component	General Location	Approximate Size
<b>Guideway</b>	<ul style="list-style-type: none"> <li>Located predominantly within the existing public right-of-way of Market Street, Manchester Boulevard, and Prairie Avenue</li> <li>The Prairie/Manchester and Prairie Hardy stations are proposed to be located on private property located west of Prairie Avenue proposed for acquisition as part of the Project.</li> </ul>	<ul style="list-style-type: none"> <li>Approximately 1.6 miles dual lane, end to end</li> <li>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</li> <li>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.</li> </ul>
<b>stations</b>		
<i>Market Street/ Florence Avenue Station</i>	<ul style="list-style-type: none"> <li>Located on private property (to be acquired by the City) at the southeast corner of Market Street/Florence Avenue</li> </ul>	<ul style="list-style-type: none"> <li>Up to ~80 feet in height measured from existing grade to top of station canopy</li> <li>~75 feet wide (station structure and guideway only; not including vertical circulation)</li> <li>~200-foot long platform for train berthing</li> <li>~420-foot long mezzanine level for back of house and circulation</li> </ul>
<i>Prairie Avenue/ Manchester Boulevard Station</i>	<ul style="list-style-type: none"> <li>Located on private property (to be acquired by the City) at the southwest corner of Prairie Avenue/Manchester Boulevard</li> </ul>	<ul style="list-style-type: none"> <li>Up to ~80 feet in height measured from existing grade to top of station canopy</li> <li>~75 feet wide (station structure and guideway only; not including vertical circulation)</li> <li>~200-foot long platform for train berthing</li> <li>~360-foot long mezzanine level for back of house and circulation</li> </ul>
<i>Prairie Avenue/ Hardy Street Station</i>	<ul style="list-style-type: none"> <li>Located on private property (to be acquired by the City) at the northwest corner of Prairie Avenue/Hardy Street</li> </ul>	<ul style="list-style-type: none"> <li>Up to ~80 feet in height measured from existing grade to top of station canopy</li> <li>~75-foot wide (station structure and guideway only, not including vertical circulation)</li> <li>~200-foot long platform for train berthing</li> <li>~340-foot long mezzanine level for back of house and circulation</li> </ul>
<b>Vertical Circulation Elements</b>	<ul style="list-style-type: none"> <li>Located at each station within the public right-of-way, easements, or private property to be acquired</li> <li>Locations will depend on station specific requirements to connect to existing sidewalk/passenger walkways.</li> </ul>	<ul style="list-style-type: none"> <li>Vertical circulation elements will exist at each station to provide access from the platform level to the mezzanine level and ground level</li> </ul>
<b>Elevated Passenger Walkways</b>	<ul style="list-style-type: none"> <li>Location 1: above Florence Avenue connecting the Market Street/Florence Avenue Station to the Metro K Line Downtown Inglewood Station.</li> <li>Location 2: above Prairie Avenue from</li> </ul>	<ul style="list-style-type: none"> <li>Height will be up to ~65 feet in height measured from existing grade to top of structure</li> <li>~30 feet wide maximum for passenger walkway</li> <li>~280 feet long for location 1 and ~160 feet long for locations 2 and 3</li> <li>Minimum vertical clearance of 10 feet within the walkway interior</li> </ul>

Project Component	General Location	Approximate Size
	Prairie/Manchester station to the Forum site <ul style="list-style-type: none"> <li>Location 3: above Prairie Avenue from Prairie/Hardy station to the Hollywood Park site</li> <li>Specific locations will be determined at time of design and coordinated with stakeholders</li> </ul>	
<b>Maintenance and Storage Facility (MSF)</b>	<ul style="list-style-type: none"> <li>Primarily located on private property to be acquired by the City as part of the Project with potential for portions of the MSF to be located within an easement at 500 E. Manchester Boulevard</li> </ul>	<ul style="list-style-type: none"> <li>~75,000 sf building area</li> <li>Up to ~75 feet in height measured from existing grade to top of roof</li> <li>Surface parking area under building containing 50 spaces for employees and visitors</li> </ul>
<b>Power Distribution System (PDS) Substation</b>	<ul style="list-style-type: none"> <li>Two PDS substations; one located at the MSF site and the second at the Prairie/Hardy Station site. the Prairie Avenue/Hardy Street Station.</li> <li>Specific locations within each site will be determined during the design phase</li> </ul>	<ul style="list-style-type: none"> <li>~30 feet wide x ~100 feet long</li> <li>Up to ~20 feet clearance height measured from floor to ceiling</li> <li>If located below grade, an additional space of ~30 feet wide x ~30 feet long for vertical circulation</li> <li>~20 feet wide x ~40 feet long additional space for auxiliary equipment such as a backup generator, if necessary</li> </ul>
<b>Roadway Improvements</b>	<ul style="list-style-type: none"> <li>Market Street, Manchester Boulevard and Prairie Avenue</li> </ul>	<ul style="list-style-type: none"> <li>New roadway striping, lane re-configurations, partial relocation, on-street parking adjustments, new sidewalks, lighting improvements, traffic signal adjustments, landscaping, and streetscape</li> </ul>
<b>Pick-Up/Drop-Off Areas, Surface Parking Lots and Staging Areas During Construction</b>	<ul style="list-style-type: none"> <li>Market Street/Florence Avenue Station site</li> <li>150 S. Market Street</li> </ul>	Surface level parking at each site: <ul style="list-style-type: none"> <li>~650 spaces at Market Street/Florence Station</li> <li>~50 spaces at 150 S. Market Street</li> <li>~100 spaces at Prairie/Hardy Station</li> </ul> Pick-Up/Drop-Off Area: <ul style="list-style-type: none"> <li>Market Street/Florence Avenue Station site on Locust Street south of Florence Avenue, and Regent Street between Locust Street and Market Street</li> <li>Prairie/Hardy Street Station within the station site</li> </ul>

### 3.5.1 Operational Characteristics

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.

### Automated Transit System Technology

The physical requirements for the proposed Project including the turn radii required for the alignment, guideway widths, station dimensions, power distribution system substations and MSF were developed based on maximizing the types of automated transit system technologies that may be viable options for

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the Project. Factors affecting the viability of available technology options include ridership capacity, ability for the system guideway to fit within the physical limitations of the existing rights-of-way, ATS train requirements, operational flexibility, and noise during operations.

The ATS transit technology is a form of light rail technology that can be steel-wheel/steel rail, rubber tired, magnetically levitated, or cable-propelled propulsion systems. The technical requirements for large, automated monorail, rubber-tire ATS train, and automated steel-wheel/steel-rail, also known as automated light rail transit (ALRT) were reviewed against the public rights of-way and property availability to determine the technologies best applicable for the proposed Project. While rubber tired ATS trains (including monorail systems) can meet the Project’s defined physical requirements, steel wheel/steel rail and cable-propelled technologies may also be viable, provided these technologies can comply with the established Project requirements including maximum limits on noise and the ability to fit within the defined physical space available for the Project. Certain suppliers offer or are in the process of updating their steel wheel/steel rail technologies, such that they may meet these requirements. For these reasons, it is prudent to allow the market to determine the best solution in terms of the proposed technology as part of the procurement process so long as performance is demonstrated to meet the limits set

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 MSF.

Operation and Ridership

The operating system components are sized based on the projected future peak demand. Ridership projections<sup>4</sup> were based on existing and future mode-share assumptions and future passenger volumes, including demand from planned and approved related projects.

Ridership

Weekday and weekend ridership demand was estimated and used to determine the peak hour demands to determine the required operations for the proposed Project. For event ridership, pre-and post-event demand for small, medium, and large events at the Forum, the SoFi Stadium at LASED, and IBEC were estimated using an event-based travel demand model. It is anticipated and assumed that riders will be distributed at various points as they travel to the Prairie Avenue/Manchester Boulevard and Prairie Avenue/Hardy Street stations from the event venues, including through walking distances to the stations

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from venue locations, ticket purchase areas at each Station, passage through fare gates and passage through designated exits. Riders were assumed to arrive at a fairly consistent rate throughout the hour.

Table 3.0-2: Ridership Projections shows the projected ridership for the proposed Project.

**Table 3.0-2  
Ridership Projections**

Event	Projected Peak Ridership
Normal Weekday/Weekend	414 peak hour passengers
Single Large Event (NFL game)	11,450 passengers departing SoFi Stadium within one hour after the end of the event

Source: Lea & Elliott Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021. Table 4-1

The proposed Project has been designed to accommodate a projected demand of approximately 8,910 passengers per hour per direction (pphd) for NFL events.<sup>5</sup> In addition, the operations to serve the normal weekday peak-hour demand of approximately 414 pphpd.<sup>6</sup> With a 2.1 minute headway, the system capacity is approximately 11,450 pphpd (assuming operating fleet is increased by introducing a “spare train” into service).

Fleet Size and Line Capacity

Line capacity is defined as the number of people per hour per direction (pphd) that the system can carry past any particular point. The estimated fleet size considers the operating fleet, which is the number of vehicles required to provide the necessary line capacity to meet the projected demand, as well as the spare fleet, comprised of the “hot” standby and maintenance trains to ensure that the number of trains required for operations is always available.

**Operating Fleet:** The proposed Project is designed to serve the most frequent, largest event, which is an NFL game at SoFi Stadium. Given that NFL games only occur approximately 20 days per year, and that the demand for those games will typically not reach full stadium capacity, the ITC system is being proposed to provide a capacity of 11,000 pphpd. The shortfall from the 11,450 pphpd NFL game ridership projection is less than 5 percent. To meet the 11,000 pphpd capacity, a fleet of six, 4-car trains operating at 2.0 minutes headways is required.

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**Spare Fleet:** For the ITC system it is assumed that one of the six-train fleet be used for hot standby or maintenance for the ITC system.

For normal weekday and weekend service, the 4-car self-propelled ATS trains may be de-coupled into smaller 1- or 2-car trains to provide service that is more optimized to the time-specific and lower projected demands. Splitting one 4-car train into two 2-car trains and operating a headway of 6.3 minutes serves a 441 pphpd ridership demand with capacity up to 1,950 pphpd for both commuter and daily service and optimizes the utilization of the fleet with respect to the lower demand. Large monorails and cable propelled trains are more difficult to de-couple so would likely operate the full generic 4-car train length for normal weekday/weekend operations.

The headways of the operating fleet to serve the projected number of passengers for self-propelled technologies are shown in **Table 3.0-3**. For purposes of defining the train, a generic vehicle dimension has been used with a maximum train length for a 4-car train of approximately 200 feet. Vehicle/car/train capacities are based on a passenger space allocation of 2.7 SF per passenger; this is consistent with the passenger space standards applied to urban transit systems.

As stated above, the headways for cable-propelled technologies are generally greater than self-propelled systems due to operational differences from self-propelled ATS systems. It is estimated that the minimum operational headway for cable propelled ATS technology would be approximately 3.9 minutes, controlled by the trip time between the Market Street/Florence Avenue and Prairie Avenue/Manchester Boulevard stations.

**Table 3.0-3  
Peak Period Ridership Headway Fleet Capacity**

Peak Period	Projected Ridership (pphpd)	Headway	Fleet	Capacity
Normal Weekday	408	6.0 minutes	2 x 2-car trains or 1 x 4-car trains	1,900
All Other Events	Maximum 6,000	2.4 minutes	5 x 4-car trains	9,500 to 9,700
NFL Event	11,000	2.0 minutes	6 x 4-car trains	11,400 to 11,600

Source: Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition August 2021. Table 5-2.

The proposed Project has the ability to provide even more additional capacity, should this be necessary in the future to accommodate changes in demand levels, event sizes, event schedules, etc. This reserve

capacity can be provided through the introduction of additional trains stored at the MSF. The stations are sized to accommodate the maximum train lengths and, for this reason, no modifications to the station configuration would be required if the reserve capacity is utilized.

### Operations

The ATS trains would typically operate daily for commuters, activity center visitors and employees 7 days per week for 18 hours per day, from 6:00 AM to 11:59 PM (midnight). The proposed Project would typically be closed with no trains operating from 12:00 AM to 5:59 AM, for 6 hours per day; during this time, maintenance activity would occur. As events at the venues along the proposed Project may occur past midnight, the ATS trains may occasionally operate for extended periods.

As event attendees travel from their event center to and from the nearest station, they would be metered and distributed at various points, including through walking distances to the stations from venue locations, ticket purchase areas at each station, passage through fare gates and passage through designated exits. As noted above, riders were assumed to arrive for events at a fairly consistent rate throughout the hour.

At the start of service, the Central Control Operator (CCO) will issue a command to initiate the required operations. The Automated Train Control (ATC) system will then automatically dispatch the necessary number of trains to the mainline from the MSF. The ATC system will be designed so that the station dwell times are adjusted until the trains are equally spaced at the required headway. To adjust the operating fleet for special event service, the CCO will issue commands to inject trains onto the mainline guideway. For removal of trains from the system, maintenance personnel will be staged at one or more stations to ensure that all passengers have deboarded the trains prior to the trains going out of service.

Total travel time from one end to the other of the proposed Project would be approximately 6.0 minutes for a self-propelled system and 7.4 minutes for a cable propelled system. **Table 3.0-4: Forecasted Northbound Station-to-Station In-Vehicle ATS Train Travel Times** shows travel times between stations. These travel times include 40 second dwells (stops) at each station. Top ATS train speed of 50 miles per hour (mph) is achievable but the actual operational speed will be limited to a maximum of 45 mph for passenger comfort.

**Table 3.0-4  
Forecasted Northbound Station-to-Station In-Vehicle ATS Train Travel Times (minutes)**

Station	Market Street/ Florence Avenue Station	Prairie Avenue/ Manchester Boulevard Station	Prairie Avenue/ Hardy Street Station
Market Street/Florence Avenue	N/A	2.9	4.6
Prairie Avenue/Manchester	2.7	N/A	1.7
Prairie Avenue/Hardy Street	4.7	2.1	N/A

Source: Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition August 2021.  
Table 5- 1.

### 3.5.2 ATS System Configuration and Alignment

Along its length, the elevated guideway structure would have a minimum clearance height of approximately 16 feet 6 inches above all roadways. The conceptual design of the alignment elevation was dictated by the elevation of the grade (that varies along the alignment) and the station platform elevations (that must be situated above the mezzanine level); the alignment elevation between stations was then adjusted to ensure that the minimum roadway clearance is maintained while simultaneously lowering the guideway elevation to the extent feasible. The dual-lane guideway would include switches to allow trains to crossover to the other track to begin return trips at the end-of-line stations. Additionally, switches would be provided to allow a train to be guided from one track to another in the event of an emergency, mechanical failure, or other event and enable sectional track bypass for failure management. The exact switch configuration and whether the train switches tracks before or after entering the end of line station will be optimized through the design process depending on the selected technology.

For the length of the alignment, the proposed Project would consist of an elevated guideway with dual tracks for train travel in both directions. The train tracks will be spaced as close together as possible with tracks diverging at approaches to/from stations and at stations. The elevated guideway would be supported by single or double column/bents (depending on the train track separations and the guideway location relative to potential column placements). While the final column locations and designs will be finalized by the selected DBFOM contractor, in consultation with the City, the conceptual alignment has been optimized to minimize the number of columns and potential double column/bents to the extent feasible while still accommodating all potential ATS system types. This approach optimizes the construction costs while simultaneously reducing the visual impact of the guideway. It is expected that during final designs, by the selected DBFOM Contractor, the Project infrastructure configuration will be optimized and refined to that indicated herein but will remain within the envelopes defined in this report as they are expected to have the largest potential impact for this environmental analysis.

To minimize the overall footprint of the proposed Project, and therefore its impact on the adjacent neighborhoods, the crossovers at the end stations, Market Street/Florence Avenue station on the northern end and Prairie Avenue/Hardy Street station on the southern end, are located at the entrance to each of the stations.

The alignment of the guideway and station locations is shown in **Figures 3.0a** through **3.0-4i**.

#### **Market Street/Florence Avenue Segment**

The Market Street/Florence Avenue segment is approximately .35 miles in length. The proposed Project would connect to the Metro K Line Downtown Inglewood station at the northern end of this segment. The guideway alignment is elevated and travels from the southeast corner of Market Street/Florence Avenue southwest towards the corner of Market Street/Regent Street where it runs along the center of Market Street until it turns east on Manchester Boulevard.

The guideway would begin at the Market Street/Florence Avenue station, situated diagonally over the current location of the retail commercial center on the northeast corner of Market Street and Regent Street, between the intersections of Florence Avenue/Locust Street and Market Street/Regent Street.

Exiting the Market Street/Florence Avenue station, the guideway would continue to extend south in the center of Market Street and within the public right-of-way, as shown in **Figure 3.0-4a**.

As shown in **Figure 3.0-4b**, at the northeast corner of the Market Street and Manchester Boulevard intersection, the guideway would partially extend beyond the public right-of-way and into the private property at 150 S. Market Street.

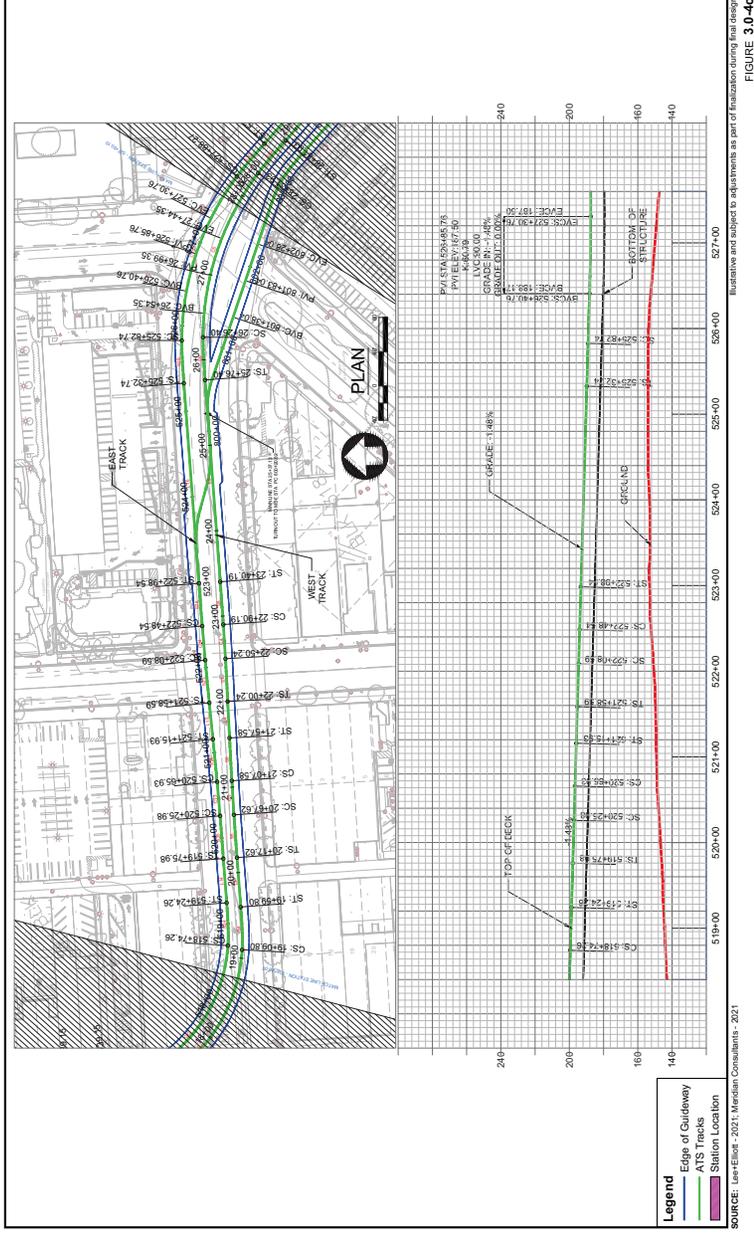
This parcel is currently occupied by a 2-story commercial building (World Hat and Boot Mart). Acquisition of this parcel is proposed as part of the Project. This parcel would accommodate the guideway and public parking that would extend to an adjacent parcel owned by the former Inglewood Redevelopment Agency.

#### **Manchester Boulevard Segment**

The Manchester Boulevard segment of the guideway is approximately .50 miles in length. This segment extends from the intersection of Market Street/Manchester Boulevard to the west, and the intersection of Prairie Avenue/Manchester Boulevard to the east as shown in **Figure 3.0-4c** through **3.04e**.

The MSF is located on this portion of the alignment to the southwest of Manchester Boulevard and will be accessed by the ATS trains from the elevated guideway (see **Figure 3.0-4d**). The MSF houses functional spaces required for the operation and maintenance.

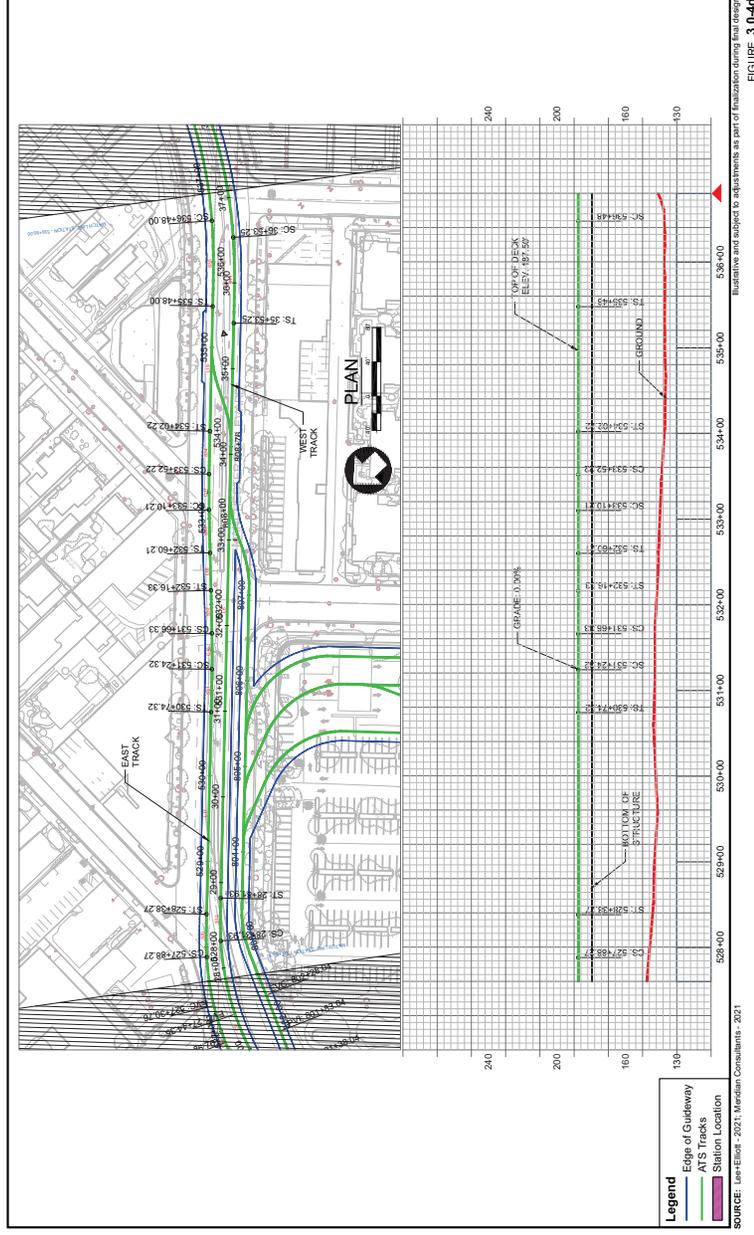




Proposed Project Alignment Plans and Profiles



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Proposed Project Alignment Plans and Profiles



21-003-20

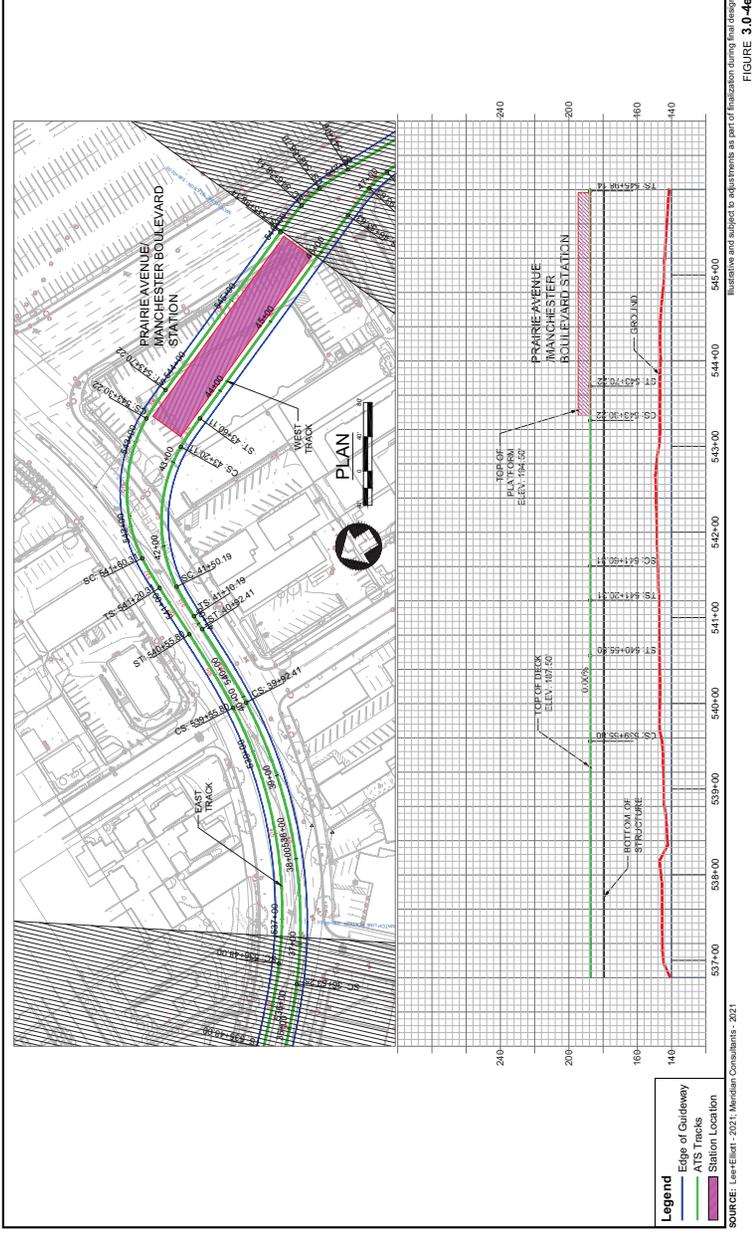


FIGURE 3.0-4e



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Proposed Project Alignment Plans and Profiles

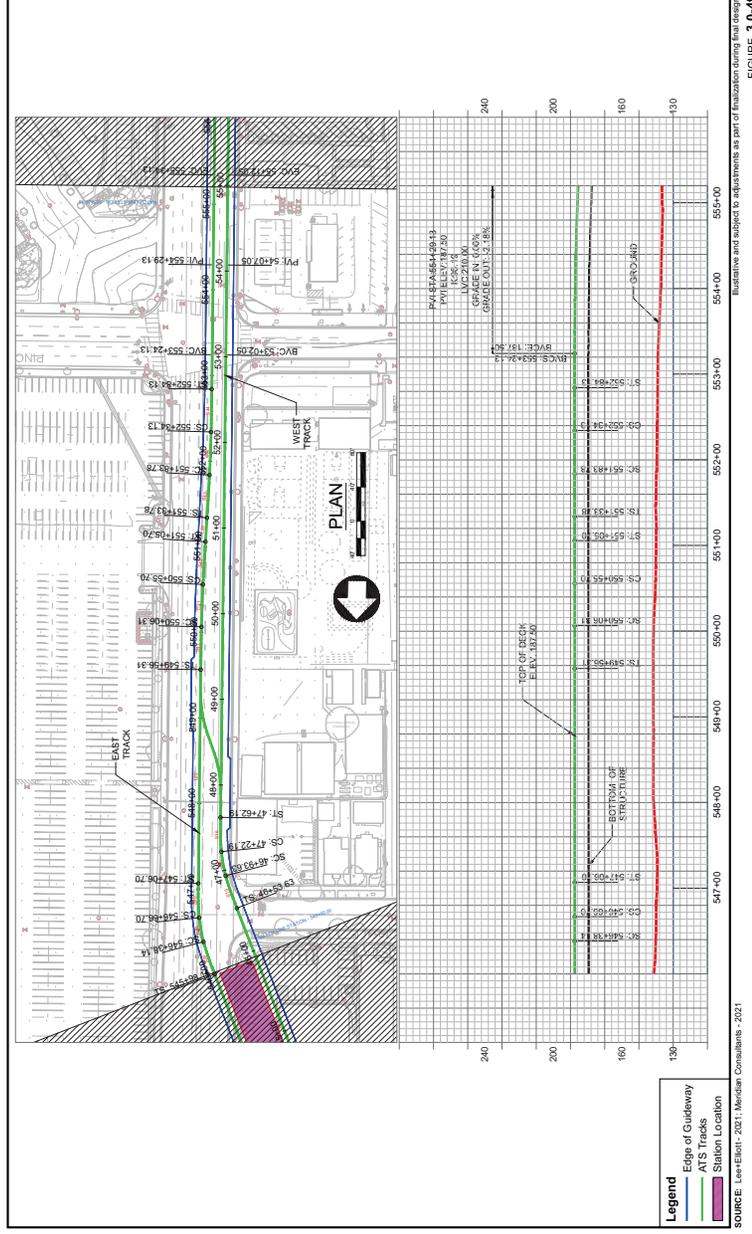


FIGURE 3.0-4f



251003-30

Proposed Project Alignment Plans and Profiles

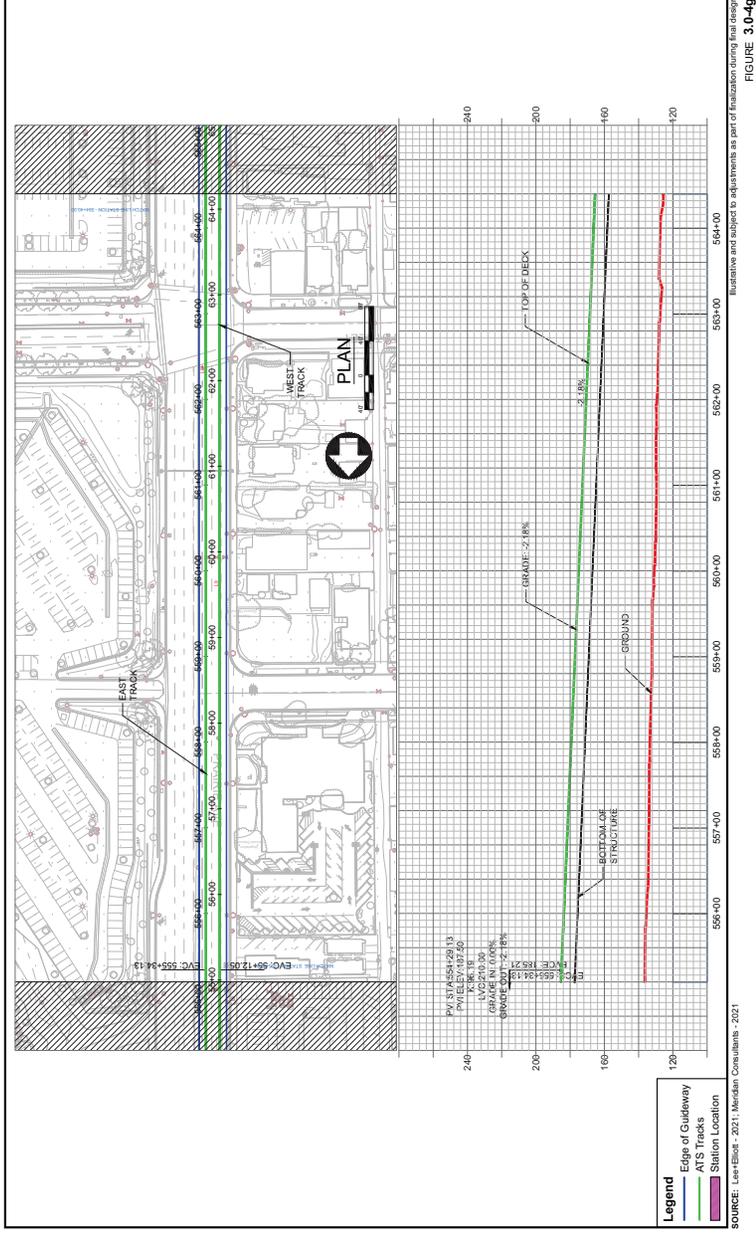


FIGURE 3.0-4g

Proposed Project Alignment Plans and Profiles



261.003249

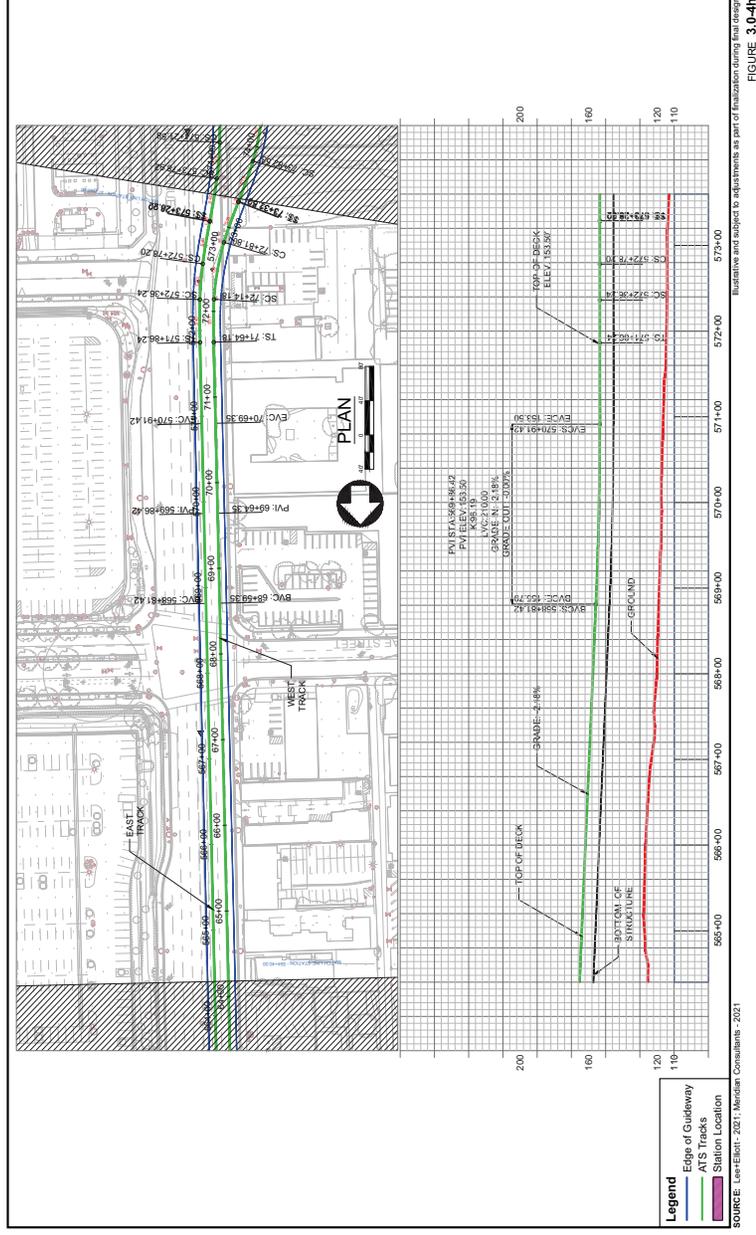


FIGURE 3.0-4h

Proposed Project Alignment Plans and Profiles



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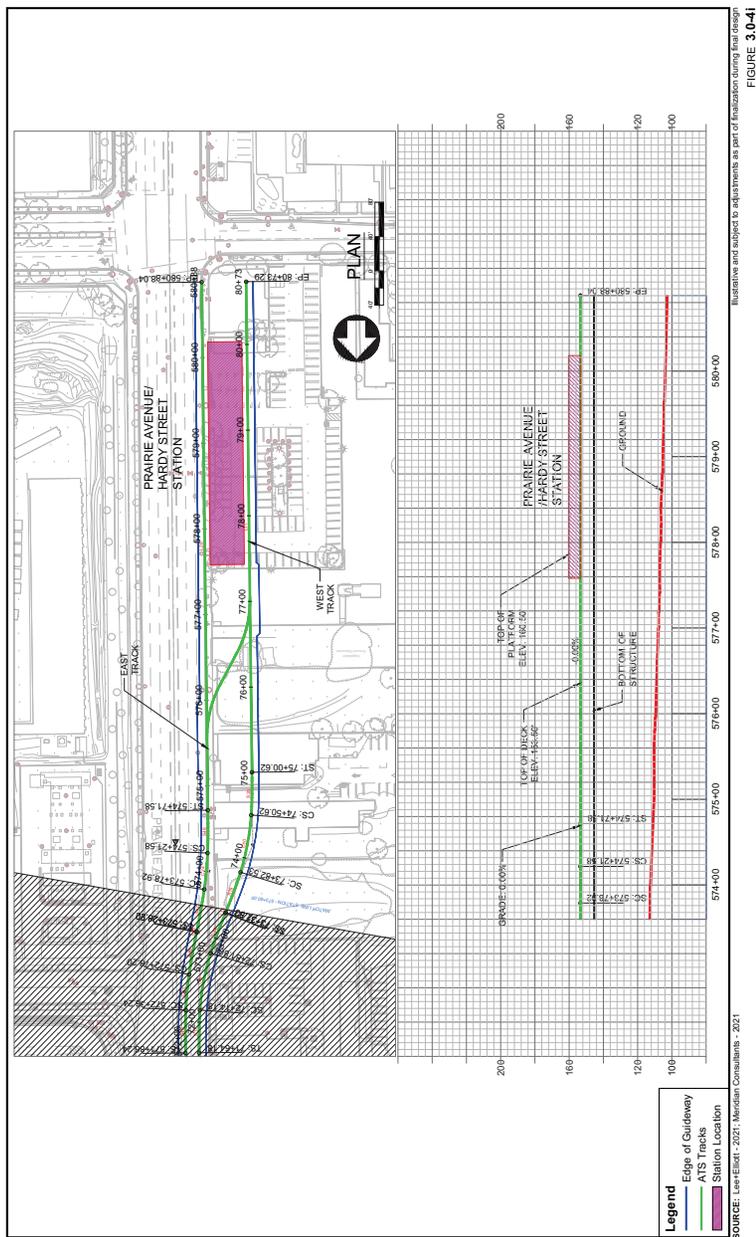


FIGURE 3.0-4i  
 Illustrative and subject to adjustments as part of finalization during final design.  
 SOURCE: Lee + Ehrlich, 2021; Meridian Consultants, 2021

Proposed Project Alignment Plans and Profiles

The proposed MSF facility will be located on a site containing an existing retail commercial building at 500 E. Manchester Boulevard containing a Vons grocery store, a private fitness gym, and a bank branch, and a gas station operated by Vons. The MSF is proposed on the eastern portion of this site and a new replacement Vons store, which would include amenities similar to the existing store, is planned on the corner of Manchester Boulevard and Hillcrest Boulevard. The guideway would include a side (tertiary) track to access the MSF. Additional track switches would be needed to allow for the access of trains from the guideway to and from the MSF; these switches would be located on the east side of the MSF near Manchester Boulevard’s intersections with Hillcrest Boulevard and Spruce Avenue as shown in **Figure 3.0-4d**. The MSF is described further below in Section 3.5.4.

At the southwestern corner of the Manchester Boulevard and Prairie Avenue intersection, the edge of the guideway would extend beyond the existing public right-of-way and onto the vacant property at 401 Prairie Avenue where the Prairie Avenue/Manchester Boulevard Station is proposed (see **Figure 3.0-4e**). Acquisition of this property is proposed as part of the Project. The guideway would approach the Prairie Avenue/Manchester Boulevard station with dual tracks straddling the center platform station and include crossover rail switches located on the southern approach of the station. The Prairie Avenue/Manchester Boulevard station is proposed on the southwest corner of Prairie Avenue and Manchester Boulevard on private property to be acquired as part of the Project. This station would provide access to The Forum, the LASED, including SoFi Stadium and other existing and future businesses and residences. The elevated guideway extending south from the station would be located on the western side of Prairie Avenue with no more than three straddle bent columns for a switch zone located immediately south of Nutwood Street. These three straddle bents would span Prairie Avenue, and potentially require acquisition of private property from the Forum. Passengers will be able to access the ground level below the station or access the Forum site directly via an elevated passenger walkway over Prairie Avenue.

**Prairie Avenue Segment**

The Prairie Avenue segment is approximately .75 miles in length beginning at the intersection of Prairie Avenue and Manchester Boulevard and provides access to the Forum, LASED including SoFi Stadium, the IBEC and other existing and future businesses and residences. This segment extends from the intersection of Prairie Avenue/Manchester Boulevard to the intersection of Prairie Avenue/Hardy Street to the south as shown in **Figure 3.0-4f** through **3.0-4i**.

The guideway would extend south along the west side of Prairie Avenue and cross the intersections of Prairie Avenue with Nutwood Street, Kelso Street/Pincay Drive, La Palma Drive, Buckthorn Street, and Arbor Vitae Street, before ending just north of Hardy Street. Between Arbor Vitae and Hardy Street the guideway will turn west from the public right of way onto property that is proposed to be acquired a part of the Project for the Prairie Avenue/Hardy Station which will be located entirely west of the existing Prairie Avenue right-of-way.

Upon exiting the Prairie Avenue/Manchester Boulevard station and continuing south, the elevated guideway would continue along the west side of Prairie Avenue until both tracks gradually transition

### 3.0 Project Description

together immediately north of Kelso Street and continue in this configuration south to Victory Street, where the tracks diverge to enter into the Prairie Avenue/Hardy Street station, proposed on a site located west of the Prairie Avenue right of way (see **Figure 3.0-4i**). The guideway would terminate at the Prairie Avenue/Hardy Street station located on the northwest corner of the Prairie Avenue and Hardy Street.

#### Columns and Structures

As previously discussed, over the length of the alignment, the Project has been configured to minimize impacts on existing facilities, roadways and to create an alignment envelope that would minimize the need for columns and double column/straddle bent support systems to the extent possible. The final column locations will ultimately be defined by the selected contractor as part of the final design process in consultation with the City. The columns, for the most part, will be required to be located within the existing public right-of-way, either within sidewalks or parking lanes, except immediately south of the Manchester Boulevard/Prairie Avenue Station where three straddle bent columns will be located south of Nutwood Street to support a switch zone that will space across Prairie Avenue.

Generally, support columns for the guideway would be single columns ranging from 6 feet to 9 feet in diameter when centered under the supported guideway to approximately 6 feet by 12 feet oblong columns when located off-center from the guideway. Columns for straddle type bents over the roadways will range from 6 feet to 8 feet in diameter. Column foundation will likely be deep shafts with depths ranging from approximately 60 to 100 feet.

#### Market Street/Florence Avenue Segment

This segment includes one center platform station on private property (to be acquired by the City) at the southeast corner of Market Street/Florence Avenue; the station is connected to the Metro K Line Downtown Inglewood station via an easily accessible elevated passenger walkway. This elevated passenger walkway will connect passengers from the at-grade plaza at the Metro station to the mezzanine level of the proposed ATS Market Street/Florence Avenue station to avoid the need for passengers to cross Florence Avenue at-grade.

The Market Street/Florence Avenue station would be supported by columns below each guideway from the northern terminus to just north of Regent Street. Here, the dual lane tracks would separate to accommodate the station's center platform and turn-back switches. As the guideway approaches Regent Street, the dual lane tracks would converge and be supported by single columns until Manchester Boulevard. The columns would be primarily located in a reconstructed median area along Market Street between Regent Street to Manchester Boulevard. From Manchester Boulevard, the guideway turns eastward towards Prairie Avenue.

#### Manchester Boulevard Segment

As the guideway turns east onto Manchester Boulevard, the guideway would transition from single columns to a one-half straddle bent to support the turn onto Manchester Boulevard before going back to

### 3.0 Project Description

single columns in a new median located in Manchester Boulevard. As the guideway approaches the MSF it will widen and require straddle bents that will span across Manchester Boulevard. From the MSF to Prairie Avenue, a combination of single column supports and straddle bents across Manchester Boulevard will be used.

Straddle bent columns will be placed in sidewalks and/or parking lanes so as to not reduce the existing roadway capacity of Manchester Boulevard. Single column supports will be located in a median within Manchester Boulevard that will not restrict existing traffic capacity or turning movements at intersections to other City Streets.

#### Prairie Avenue Segment

No more than three straddle bent columns will support the guideway as it proceeds south onto Prairie Avenue from the Prairie Avenue/Manchester Boulevard Station just past Nutwood Street, transitioning to single column supports as the guideway converges after leaving the Manchester Boulevard/Prairie Avenue station. As the guideways converge, it will transition to single column supports located on the western side of Prairie. The guideway begins diverging south of Victory Street to the west of Prairie Avenue on its approach to the Prairie Avenue/Hardy Street station and will be supported by straddle bents in the sidewalk and west of the public right of way. There will be no straddle bents located across Prairie, south of Pincay Street.

#### Maintenance and Emergency Access

A continuous walkway would be provided along the entire length of the guideway to provide emergency egress for evacuating passengers and safe access for operations and maintenance personnel to access guideway and wayside equipment.

Maintenance walkway considerations and requirements will comply with the applicable requirements that generally include the following:

- The walkway must be continuous through crossovers/switches or other elements that may act as barriers.
- The walkway should be located at or below the vehicle floor level under both normal and worst-case vehicle suspension failure conditions. It is desirable to locate the emergency walkway not more than 12 inches below the vehicle floor level. The walkway must not be more than 40 inches below the vehicle floor level under any circumstances.
- Walkways without a railing should be at least 44-inches wide and walkways with a railing should be at least 30-inches wide.
- The walkway should provide a clear cross-sectional envelope at least 30 inches wide to a height of 6 feet-8 inches above the walkway surface.
- Emergency walkway lighting is required along the entire walkway and egress route and will normally be turned on only when passengers are required to evacuate a train or during maintenance activities.

### 3.5.3 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 will provide connections to the Metro K Line and Downtown Inglewood. The Prairie Avenue/Manchester Boulevard station will include an elevated pedestrian walkway crossing over Prairie Avenue to provide a connection to the Forum, local businesses, and residences, and the LASED. The Prairie Avenue/Hardy Street station will provide connections to the LASED including SoFi Stadium, the commercial uses at Hollywood Park, the IBEC as well as existing and future local businesses and residences.

Each station is designed in three levels including the ground, mezzanine, and platform levels. From the ground level, each station includes vertical circulation (stairs/escalators/elevators) from grade at existing sidewalks and passenger areas adjacent to the stations to the mezzanine and platform levels of the station. The mezzanine level provides connections for passengers received from connecting elevated passenger walkways to avoid at-grade passenger roadway crossings. The Market Street/Florence Avenue station will include an elevated passenger walkway connecting to the Metro K Line Downtown Inglewood station. The Prairie Avenue/Manchester Boulevard station will include an elevated passenger walkway connecting to the Forum property, and the Prairie Avenue/Hardy Street station will include an elevated passenger walkway connecting to the LASED properties on the east side of Prairie. **Figure 3.0-5: Typical Station Design** shows the configuration that would be used for the stations; the typical design would be modified as needed to address site specific conditions, and the elevated passenger walkways will be located in consultation with affected property owners. With the exception of the elevated passenger walkway, the Prairie Avenue/Hardy Street Station will not encroach onto or over Prairie Avenue.

As noted, station design capacity would be established by passenger demand volumes under typical peak conditions, service disruptions, and emergency evacuation situations. Queuing and circulation requirements would be determined using the number of peak-hour passengers boarding and disembarking the ATS trains defined by the long-range planning horizon. Like all public elements of the Project, stations would be required to be fully accessible to passengers with disabilities. The station configurations would be refined as necessary to be compatible with the designs of the major venues the system would serve, and utility alignments.

Center platform configurations generally result in a smaller footprint and are proposed for the stations. These platforms would be located between guideways and serve as both boarding and disembarking platforms for passengers traveling in either direction.

Vertical circulation would be provided at either or both ends of station platforms, or within the length of the platform. A mezzanine level is anticipated under the station platform to connect to the street level through passenger walkways.

### Vertical Circulation at the stations

The stations will provide vertical access to the various station levels (Platform, mezzanine, and street level). The platform level where the ATS train will access the stations will be above the mezzanine and street levels. The mezzanine level will allow ATS riders to reach the street level and access passenger walkways to connect to other facilities such as the Metro K Line Downtown Inglewood Station or areas beyond the normal street level landing areas.

Vertical circulation to the platform may be at the ends or along the platform. The configurations with access at the ends of the platform are referred to as “single-ended” and “double-ended” if they provide access at one end or both ends, respectively. Several factors will determine where vertical circulation is located on the platforms, including the station orientation in relation to the adjacent facility, physical and geometric constraints, and the orientation of the station relative to adjacent facilities, such as the Metro K Line, the Forum, the SoFi Stadium at LASED, and the IBEC.

The concentration of passenger demand will also influence the size and location of vertical circulation. Vertical circulation for each station will address the concentration of passenger demands to minimize congestion and long passenger queues. To the degree feasible, the passenger demand will be evenly distributed throughout the station.

Design of the vertical circulation components will also address mobility requirements of passengers (strollers, walkers, wheelchairs, mobility concerns, and all requirements of the Americans with Disabilities Act (ADA)). From a safety point of view, adequate passenger egress capacity will be provided to ensure that the passengers alighting from the ATS trains to the platform can be dissipated through the available vertical circulation prior to the next ATS train arrival. Consideration will be given to the fact that escalators and elevators can be unavailable for use due to either unforeseen failures or preventative maintenance.

Based on analysis of passenger demands, each station platform will likely include 2 escalators in each direction for boarding and disembarking, plus another reversible escalator to assist with peak ridership events and redundancy. Additionally, 2 elevators and 6-foot-wide stairs to serve all levels will be provided. Exact requirements will be established during the design phase of the Project.

### 3.5.4 Maintenance and Storage Facility (MSF)

The MSF would be used for regular and preventive maintenance of the ATS trains and operating equipment, as well as space for storage of the vehicle fleet. As shown in **Figure 3.0-6: MSF Site Plan**, the 75,000 SF MSF is proposed on the eastern portion of the block bounded by Manchester Boulevard, Hillcrest Boulevard, Nutwood Street, and Spruce Avenue. The MSF building will be elevated to match the track elevation.

This site is currently developed with a retail commercial building containing a Vons grocery store, a private fitness gym and a gas station operated by Vons. The existing commercial building would be demolished

and a new Vons store, approximately 46,400 SF in size, would be built in a more prominent location on the corner of Manchester Boulevard and Hillcrest Boulevard. Parking for the new Vons store, consisting of approximately 205 spaces, will be provided east and south of the store on the site and will include parking under the MSF building. Parking for MSF employees and visitors, consisting of approximately 50 spaces, will be provided in a gated surface parking lot located within the site, west of the MSF building. A PDS substation is proposed on this site.

As shown in **Figure 3.0-7: MSF Plan and Section Views**, 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. The maintenance level will contain mezzanine administrative office space. The ground level would include multiple rows of columns and support beams for structural support. The approximate dimensions of the MSF are shown on **Table 4.0-3**.

The ground floor would consist of a generally unenclosed space containing public parking for the new Vons store. A gated surface parking area containing approximately 50 parking spaces for employees and visitors to the MSF will be provided west of the MSF building. A loading dock and circulation area for large trucks, access driveways, and one of the two PDS substation (~30 feet by 100 feet) will be located on the southern portion of this site.

The central area of the MSF would consist of two train docks for light maintenance of the trains. Finally, near the northwestern side, the MSF would include two more train docks to be used for heavy vehicle maintenance. The heavy maintenance docks would be located on top of a solid platform structure to capture and contain any mechanical fluids or components during maintenance activities. The space occupying the southeastern-most side of the MSF would be used for inventory, equipment storage, mechanical/electrical shops, and employee facilities.

The mezzanine office space would be located above the inventory and storage area on the second floor. This area would house the operations control center where automated train operations are monitored and controlled. In addition, this level would include office space, conference room(s), employee locker and break room(s), restrooms, and a technician workspace.

Vehicle and passenger access to the MSF would be provided via controlled gates. Security measures for the MSF would include secured perimeter fencing, automated gates, electronic security card systems, intercoms, security cameras, and exterior lighting.

The MSF will be designed consistent with the ITC Design Standards and Guidelines (Design Guidelines) (see *section 3.5.8*), whereby massing and height will be minimized, rooftop equipment will be fully screened, color palette will be generally uniform and neutral in tone, and transparent glazing shall be provided to maximize daylight to the extent feasible. Additionally, lighting will be placed to minimize spillover to adjacent properties and building entrances and passenger paths will be clearly lit.

### 3.5.5 Power Distribution System Substations

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 Power Distribution System (PDS) substations located along the alignment. The two PDS substations would be located at the MSF and Prairie Avenue/Hardy Street station sites. The SCE service connection for the system would be provided to the PDS substation on the MSF site.

Each PDS substation is approximately 3,000 SF (approximately 30 feet by 100 feet) with 14 feet of clearance above the finished floor (see **Figure 3.0-8: Typical PDS Substation Layout**). Each PDS substation includes equipment to transform the medium- to high-voltage power feed provided from the power companies to the typically required 750-volt direct current (VDC) needed to power the vehicles and power for housekeeping and other ancillary equipment.

Based on a distribution study completed by SCE, upgrades to the existing distribution system are required to accommodate the maximum power load for the Project. These upgrades consisting of approximately 1,500 feet of new civil work/duct banks, 1,860 feet of new 1000 jacketed concentric neutral (JCN) cable, 1,700 feet of upgrading/re-cabling of the existing SCE primary cable to 1000 JCN, and two new gas switches, will be constructed as part of the Project.

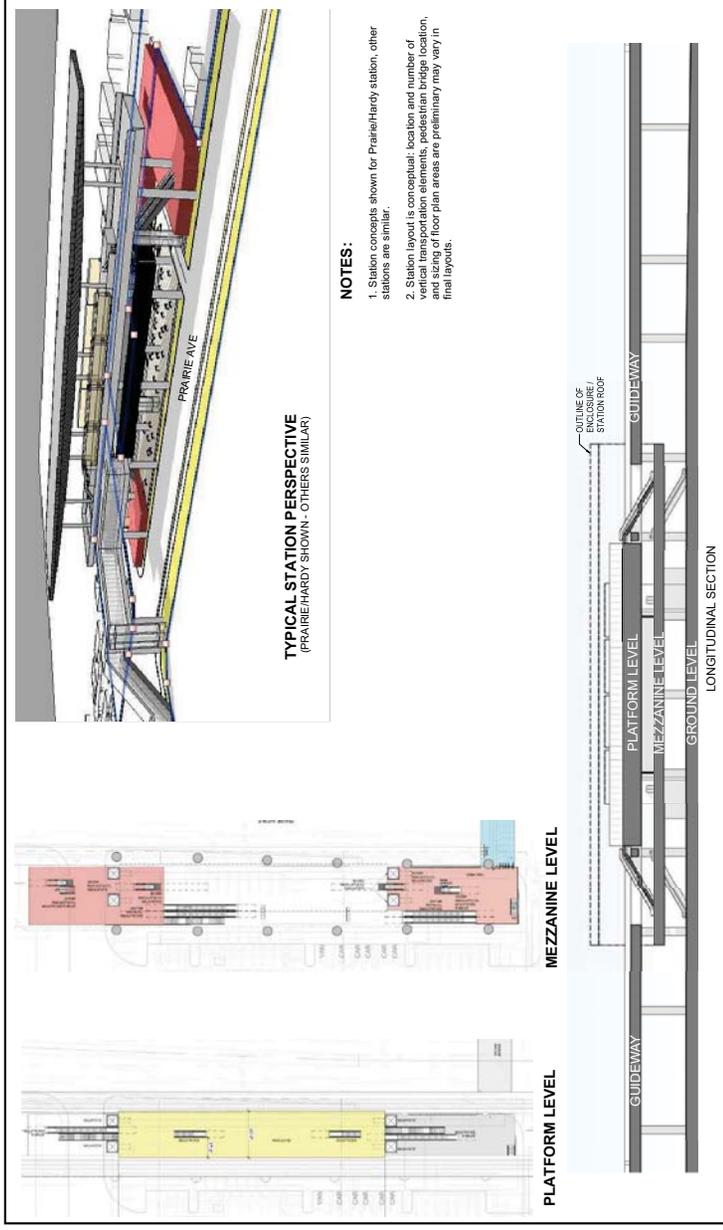
To assure the ATS trains can reach the nearest stations to offload riders in the event of loss of electrical supply, each PDS substation will be equipped with backup power generators. The backup generators would be capable of supplying power to the ATS trains for either 100 percent or 50 percent electrical capacity for a limited time to allow trains to complete their route so that riders can disembark at a station.

### 3.5.6 Roadway Improvements

To achieve the City's goal of maintaining existing roadway capacity while accommodating the components of the Project, a series of roadway improvements are proposed as described below.

#### **Restriping and Lane Modifications**

A brief description of the existing and proposed characteristics of these roadway segments including number of lanes, intersection geometry, traffic control, on-street parking, sidewalks and crosswalks, and speed limits is provided below. Roadway striping and cross-sections are included in **Figures 3.0-9 to 3.0-23: Striping Plans**, and **Figures 3.0-24 to 3.0-31: Cross-Sections**.



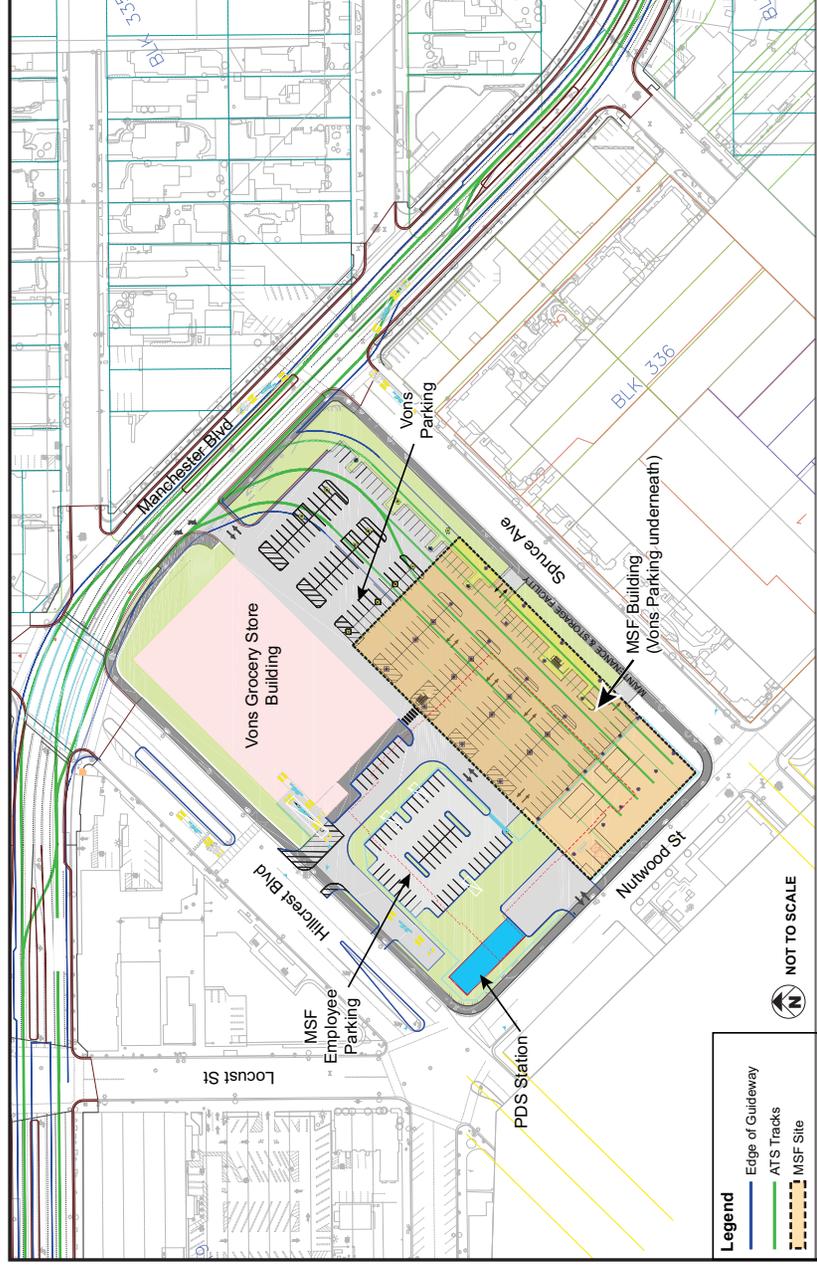
**NOTES:**

1. Station concepts shown for Prairie/Hardy station, other stations are similar.
2. Station layout is conceptual; location and number of guideways, mezzanine level, platform, and sizing of floor plan areas are preliminary and may vary in final layouts.

SOURCE: SOM - 2021; Meridian Consultants - 2021  
Illustrative and subject to adjustments as part of finalization during final design  
FIGURE 3.0-5



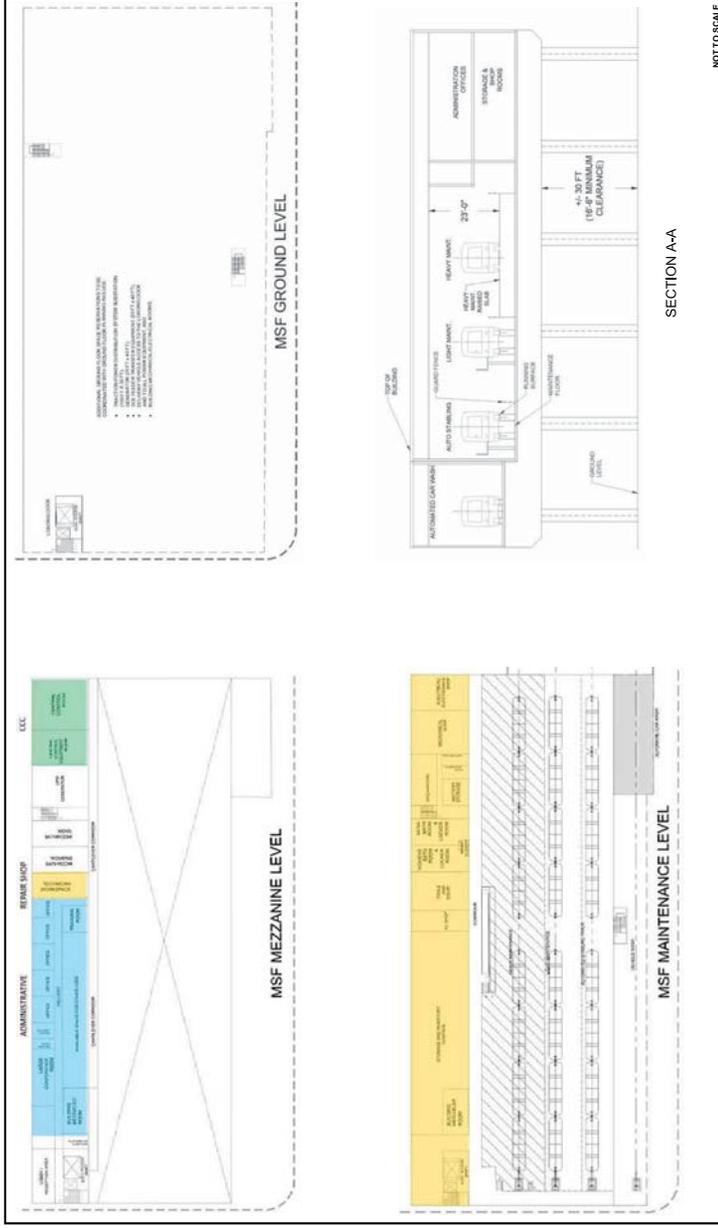
**Typical Station Design**



SOURCE: Lee+Elliott - 2021; Meridian Consultants - 2021  
Illustrative and subject to adjustments as part of finalization during final design  
FIGURE 3.0-6



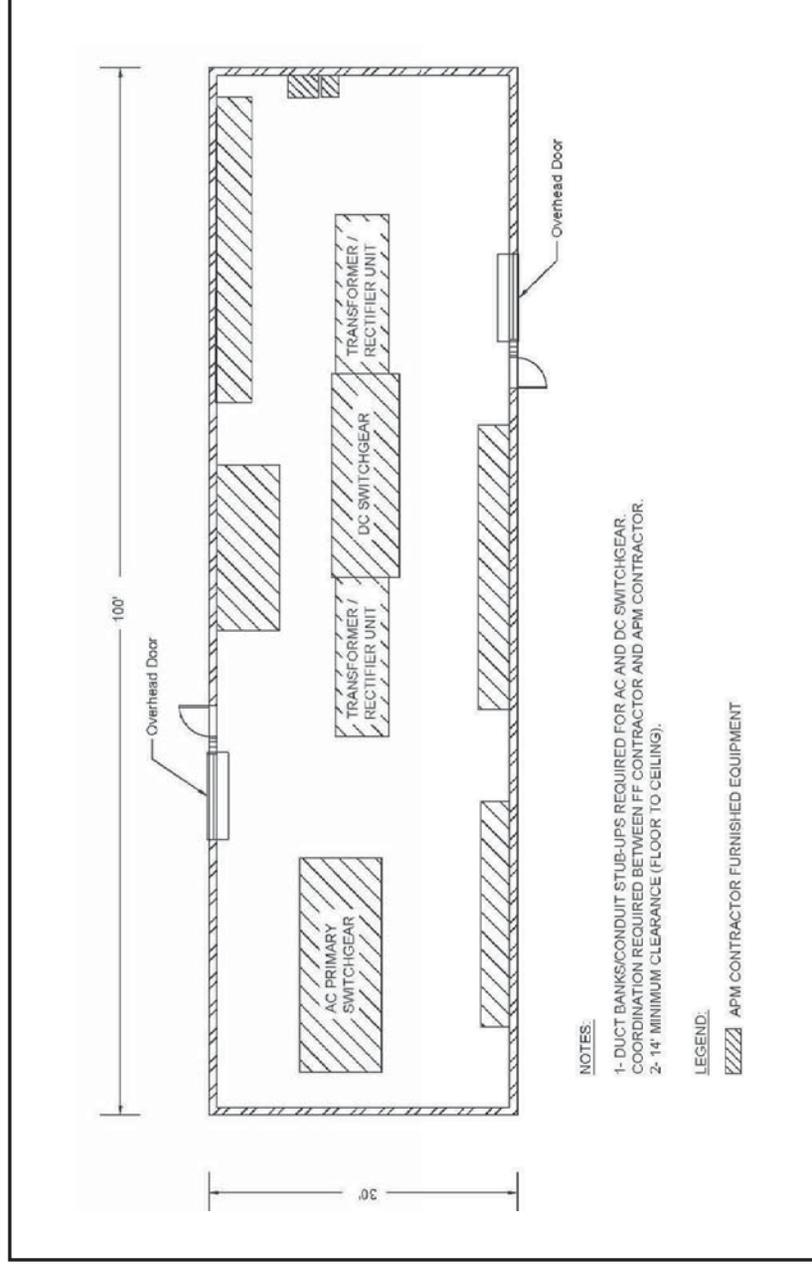
**MSF Site Plan**



SOURCE: Lee+Elliott - 2021, Meridian Consultants - 2021



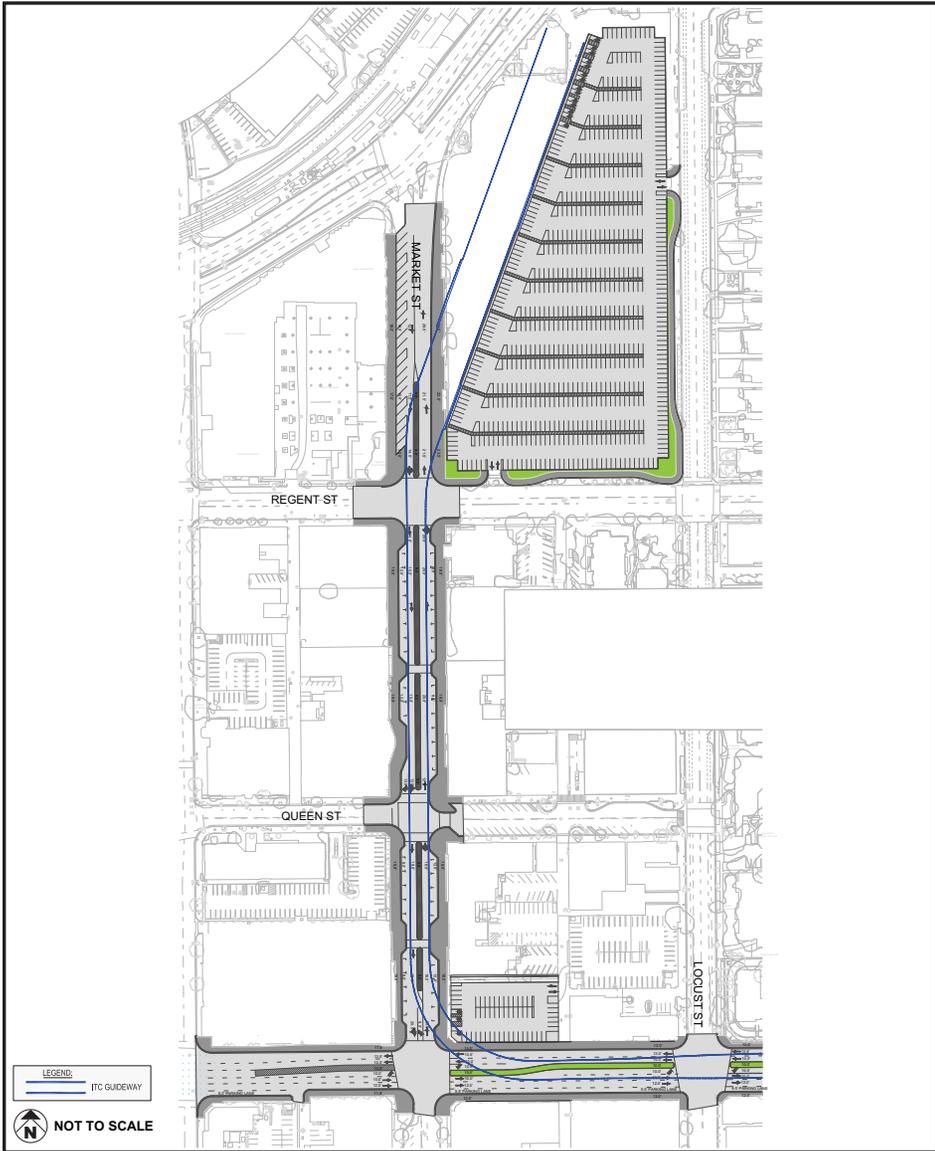
**MSF Plan and Section Views**



SOURCE: Lee+Elliott - 2021



**Typical PDS Layout**



SOURCE: Raju Associates - 2021

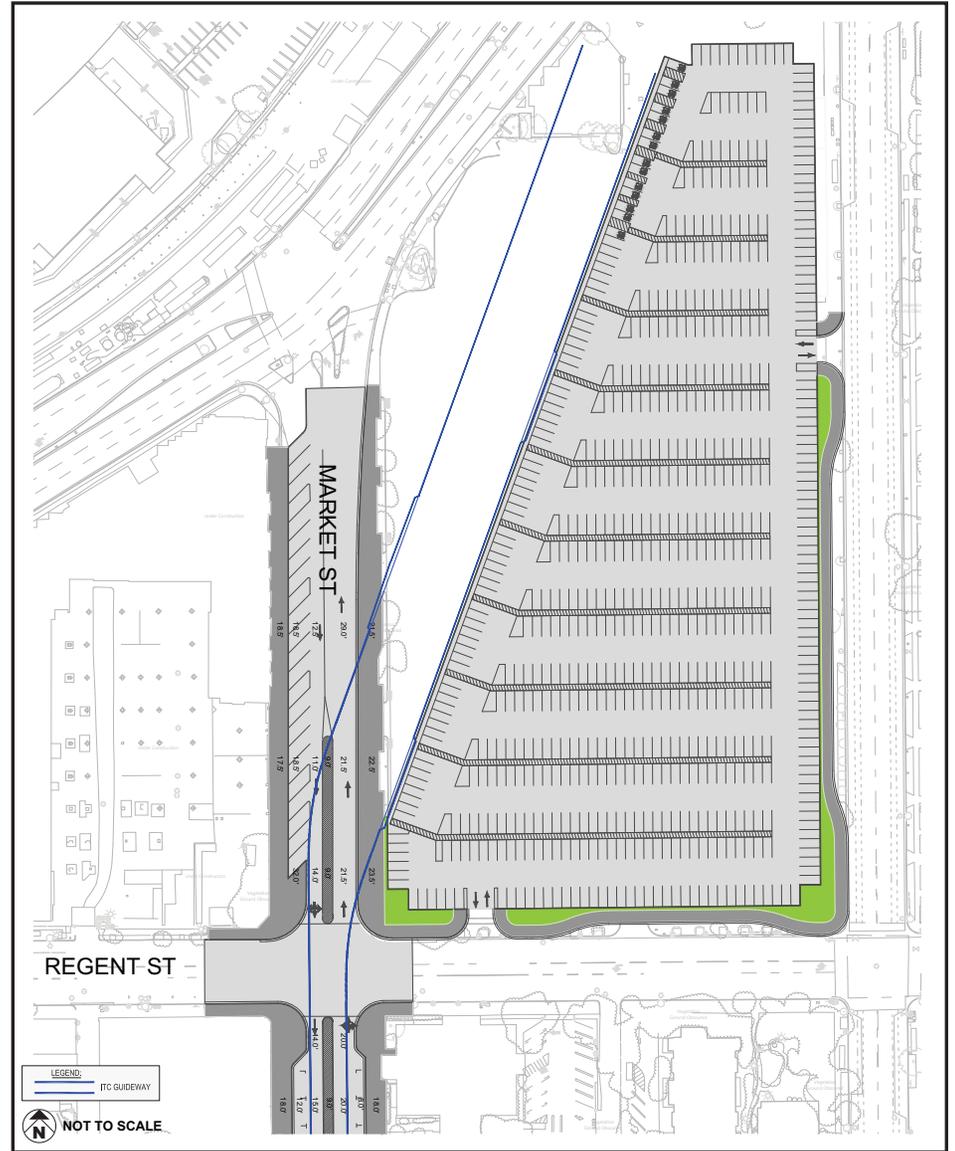
Illustrative and subject to adjustments as part of finalization during final design

FIGURE 3.0-9



Market Street Conceptual Roadway Striping Plan Overview

251-003-20



SOURCE: Raju Associates - 2021

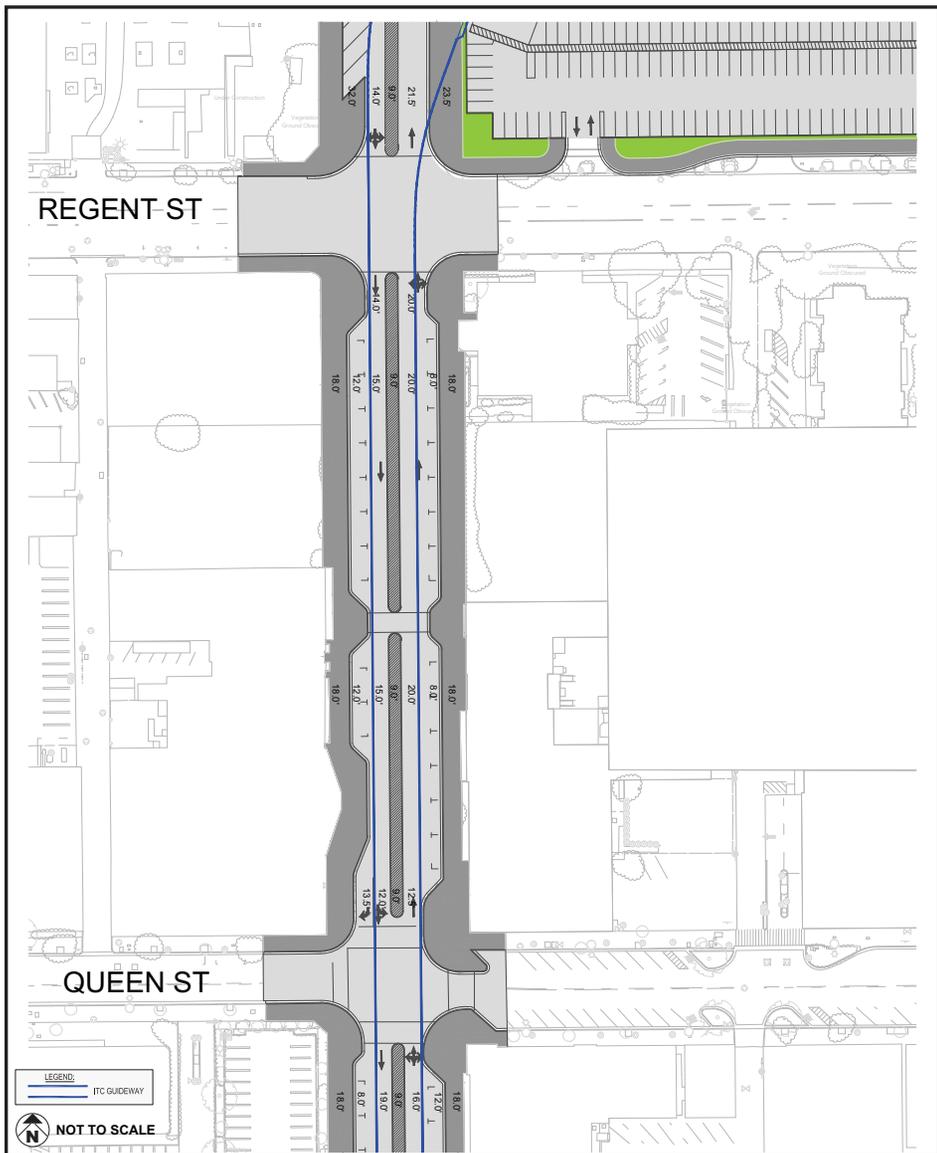
Illustrative and subject to adjustments as part of finalization during final design

FIGURE 3.0-10



Market Street Conceptual Striping Plan – Florence Avenue to Regent Street

251-003-20

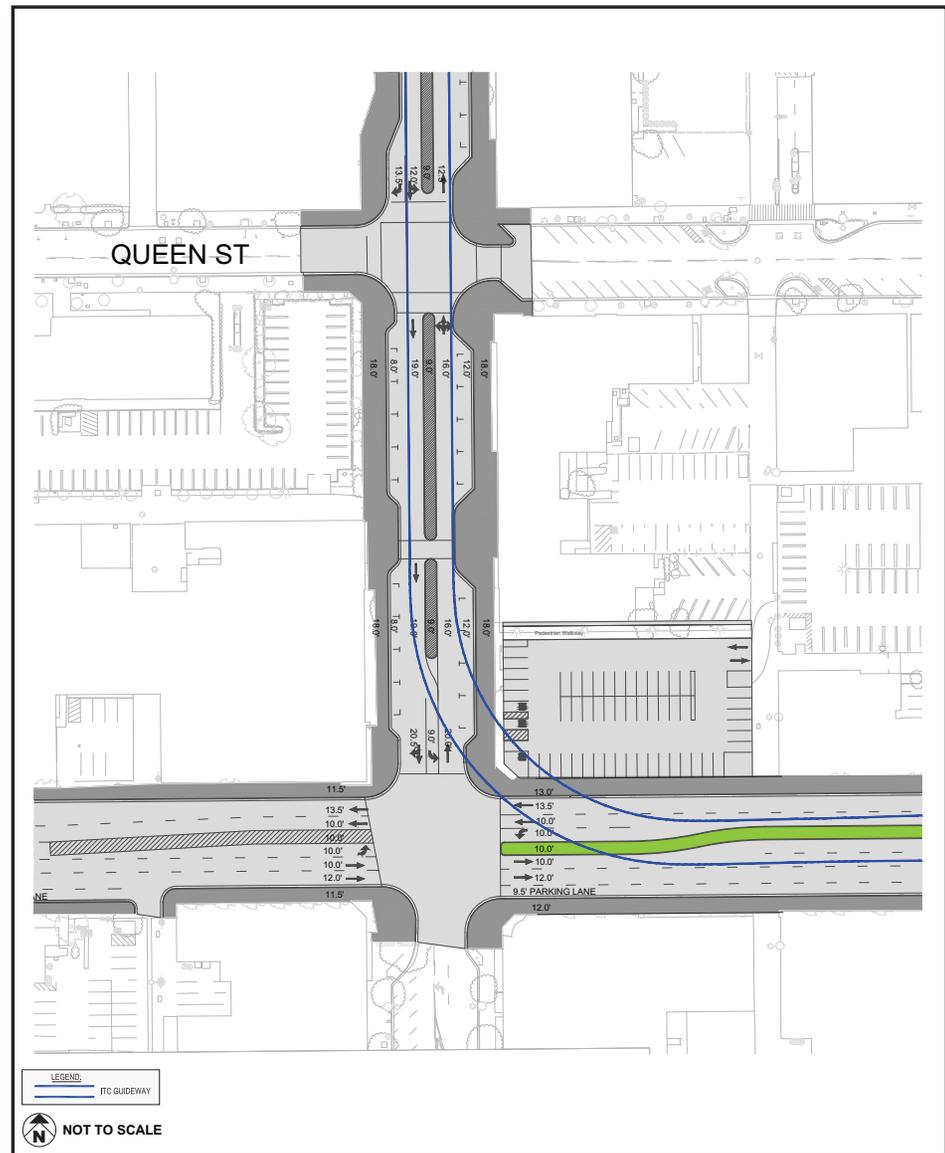


SOURCE: Raju Associates - 2021 Illustrative and subject to adjustments as part of finalization during final design

FIGURE 3.0-11

Market Street Conceptual Striping Plan – Regent Street to Queen Street

251-003-20



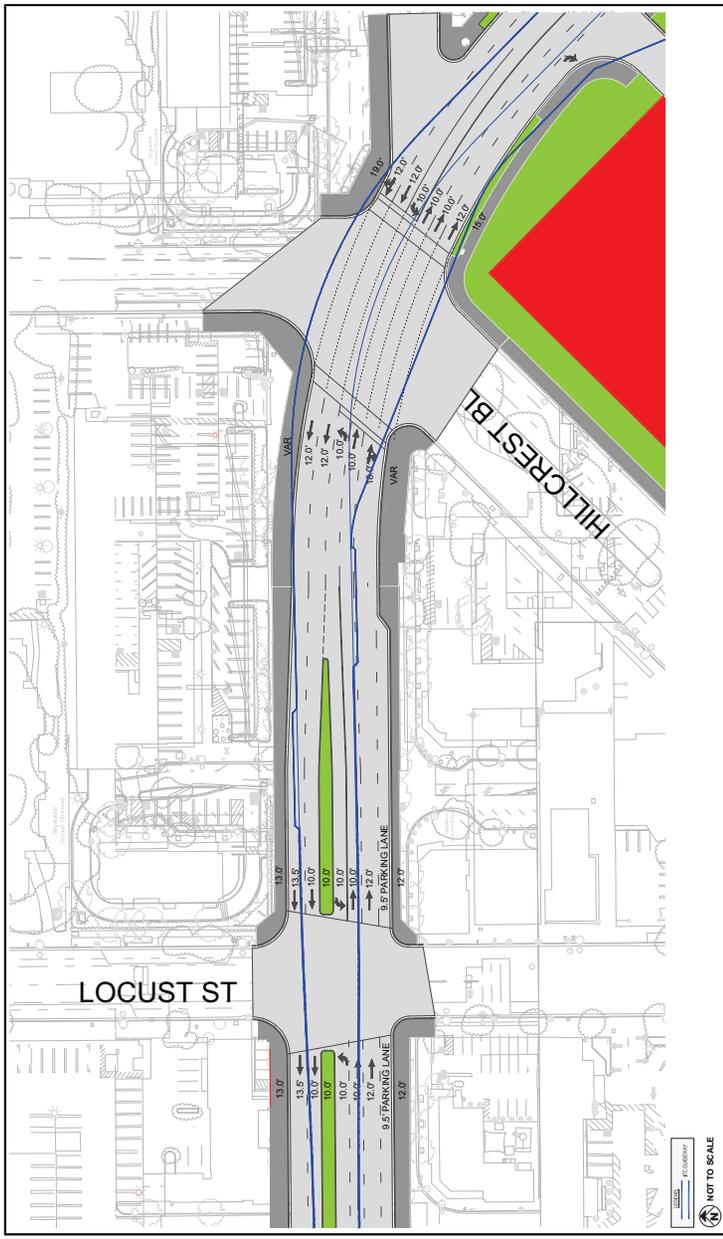
SOURCE: Raju Associates - 2021 Illustrative and subject to adjustments as part of finalization during final design

FIGURE 3.0-12

Market Street Conceptual Striping Plan – Queen Street to Manchester Boulevard

251-003-20



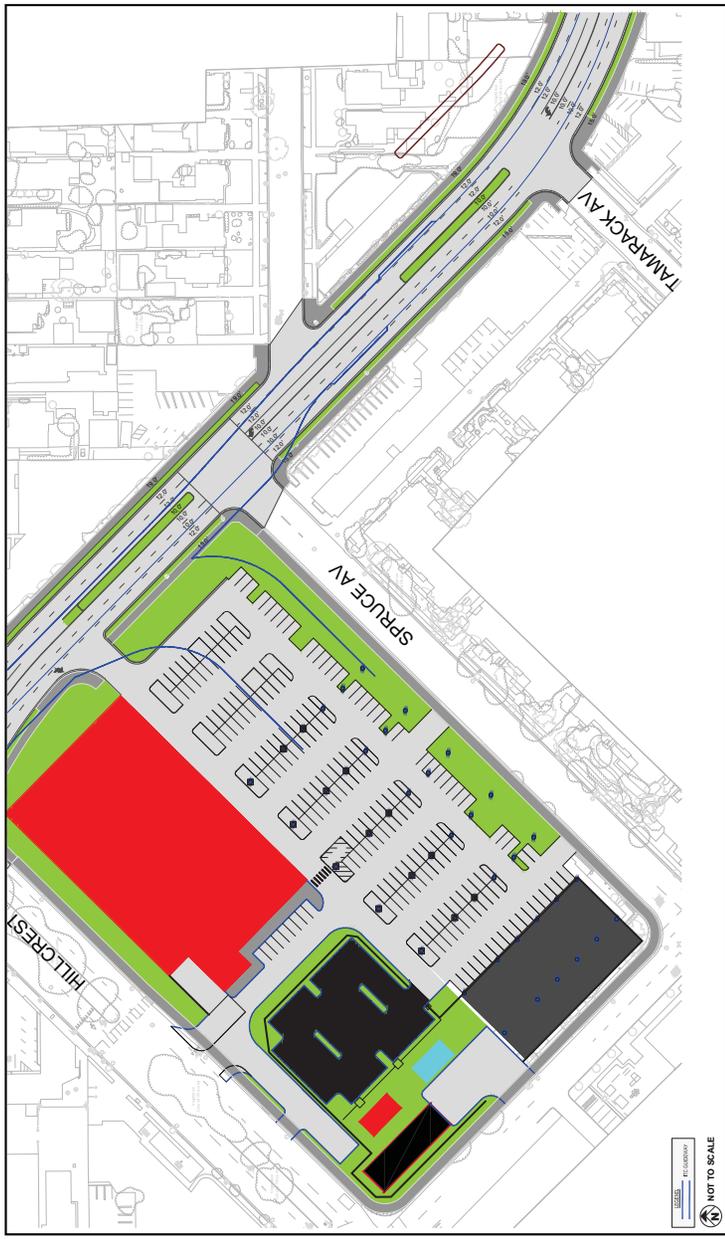


Illustrative and subject to adjustments as part of finalization during final design.  
**FIGURE 3.0-15**

Manchester Boulevard Conceptual Striping Plan – Locust Street to Hillcrest Boulevard



211-003-20

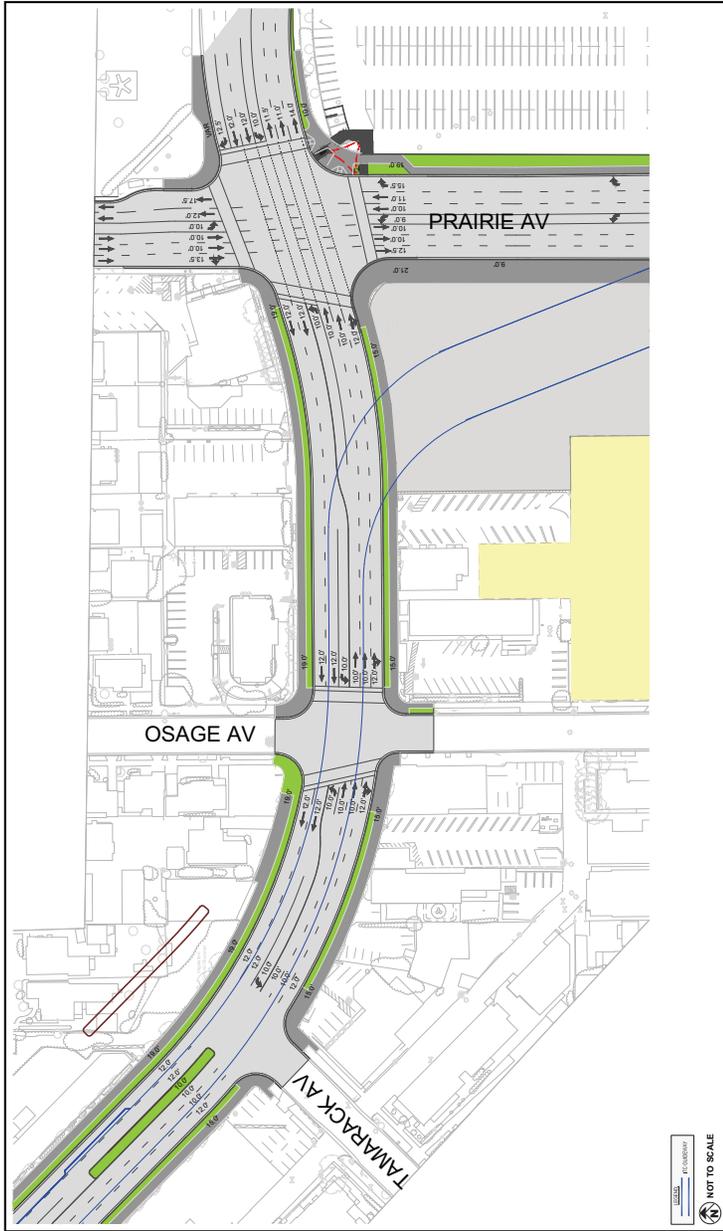


Illustrative and subject to adjustments as part of finalization during final design.  
**FIGURE 3.0-16**

Manchester Boulevard Conceptual Striping Plan – Hillcrest Boulevard to Tamarack Avenue



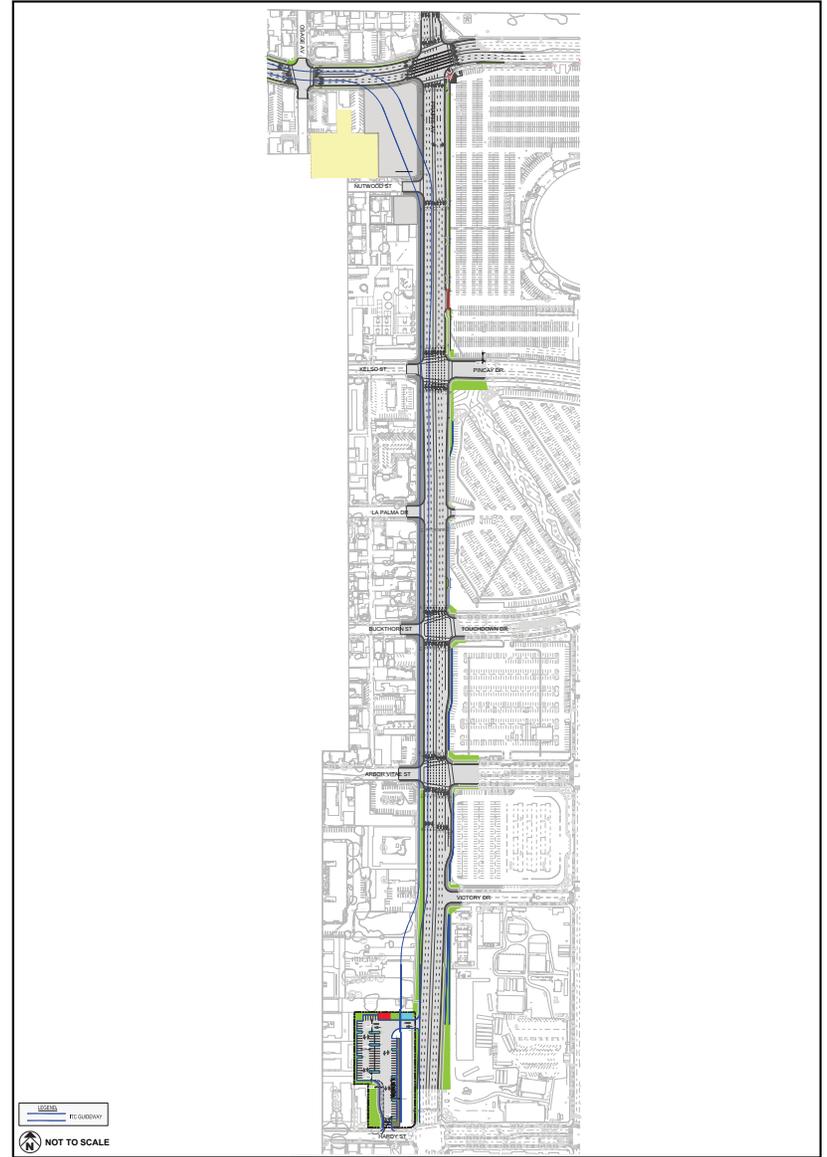
211-003-20



Illustrative and subject to adjustments as part of finalization during final design.

FIGURE 3.0-17

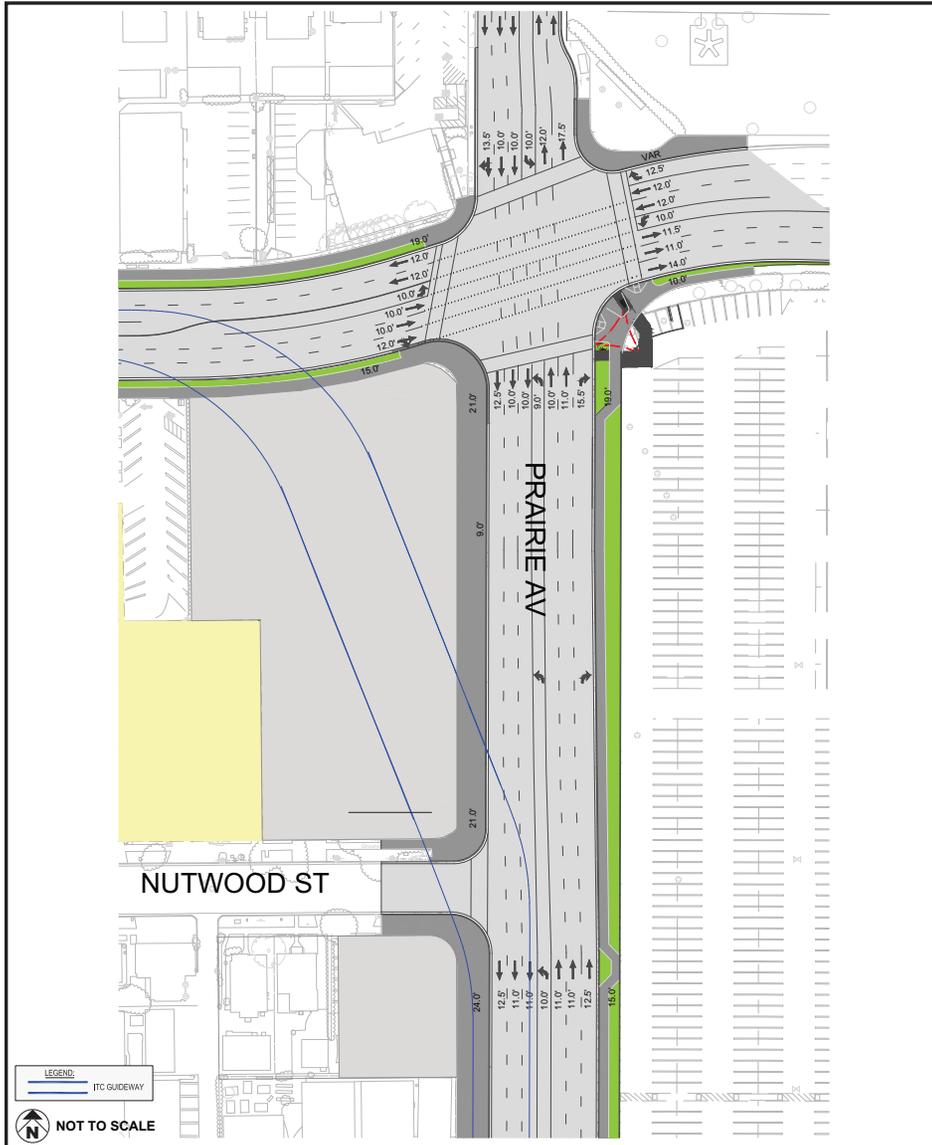
Manchester Boulevard Conceptual Striping Plan – Tamarack Avenue to Prairie Avenue



Illustrative and subject to adjustments as part of finalization during final design.

FIGURE 3.0-18

Prairie Avenue Conceptual Roadway Striping Plan Overview



SOURCE: Raju Associates - 2021

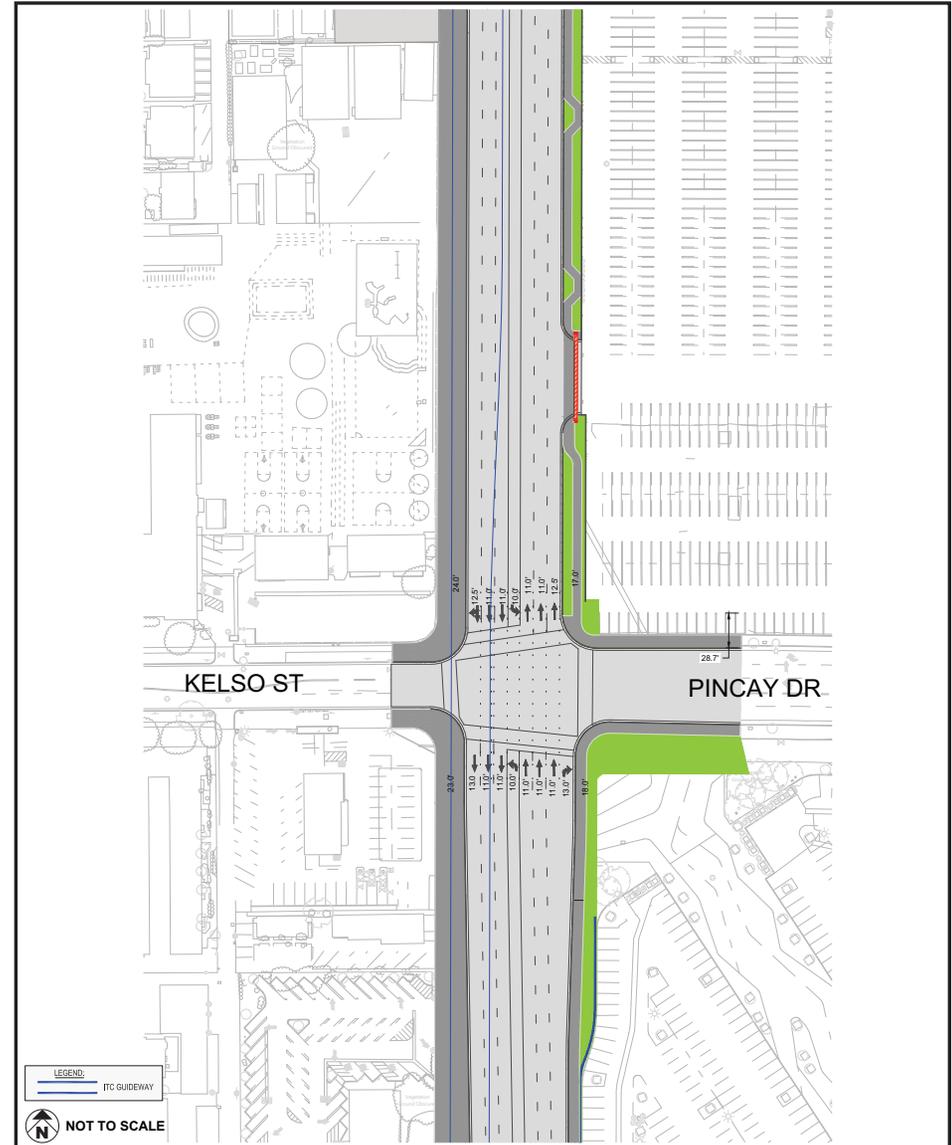
Illustrative and subject to adjustments as part of finalization during final design

FIGURE 3.0-19

Prairie Avenue Conceptual Striping Plan –  
Manchester Boulevard to Nutwood Street



251-003-20



SOURCE: Raju Associates - 2021

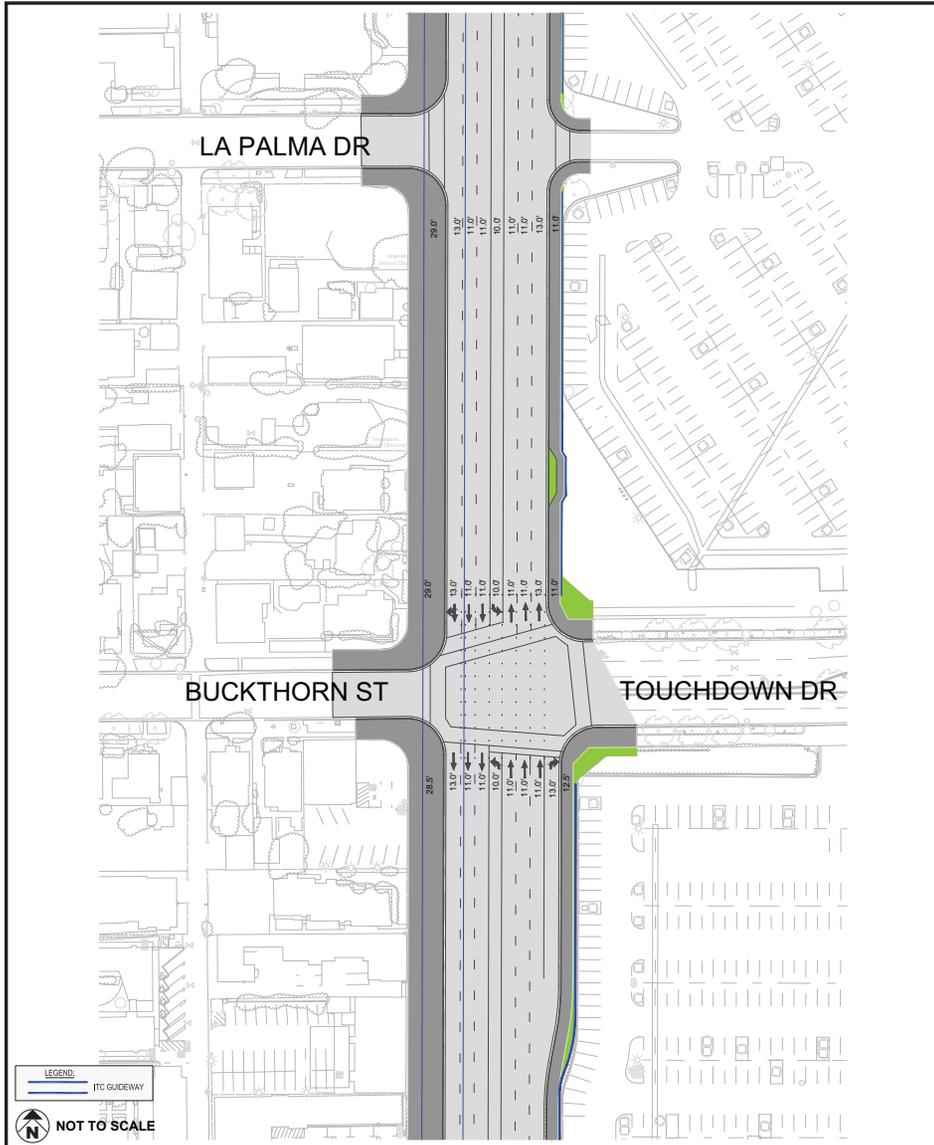
Illustrative and subject to adjustments as part of finalization during final design

FIGURE 3.0-20

Prairie Avenue Conceptual Striping Plan – Nutwood Street to Kelso Avenue



251-003-20



SOURCE: Raju Associates - 2021

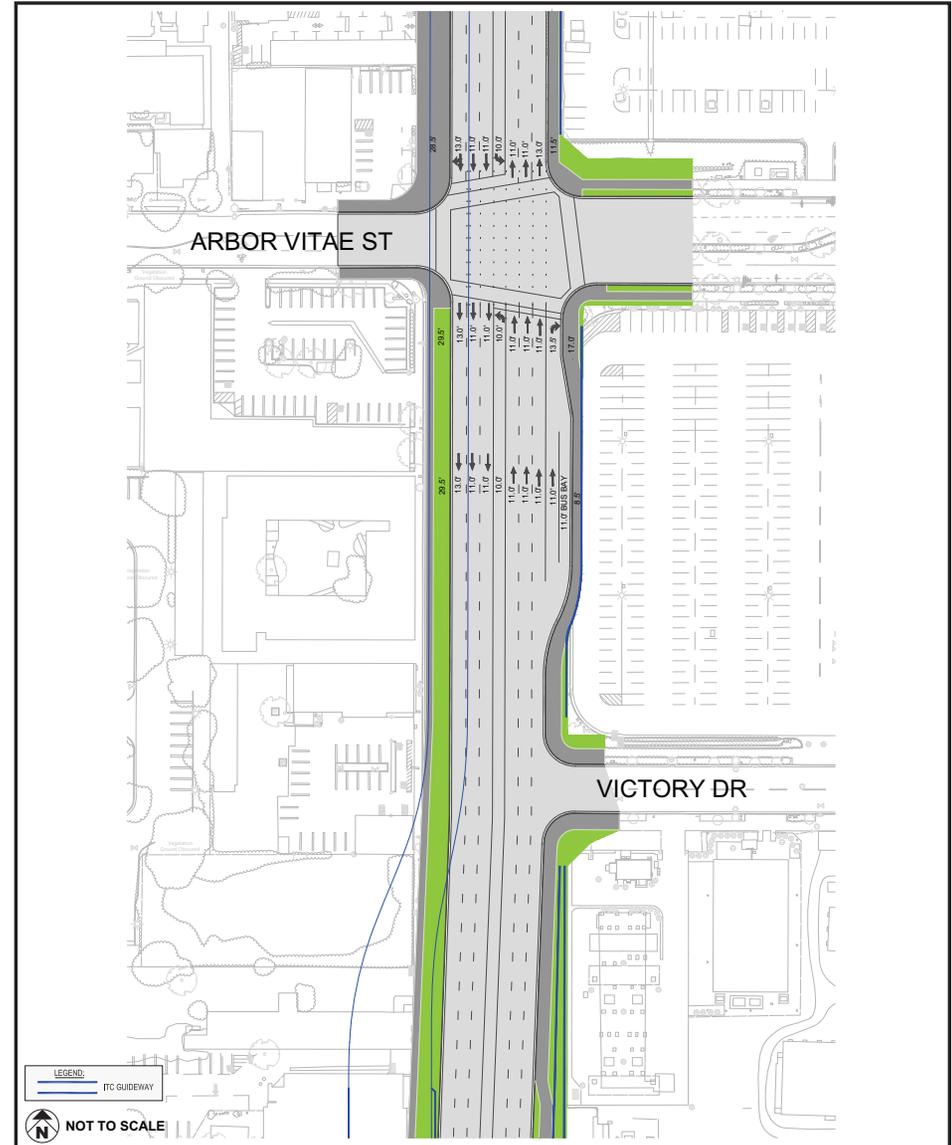
Illustrative and subject to adjustments as part of finalization during final design

FIGURE 3.0-21

Prairie Avenue Conceptual Striping Plan –  
La Palma Drive to Buckthorn Street



251-003-20



SOURCE: Raju Associates - 2021

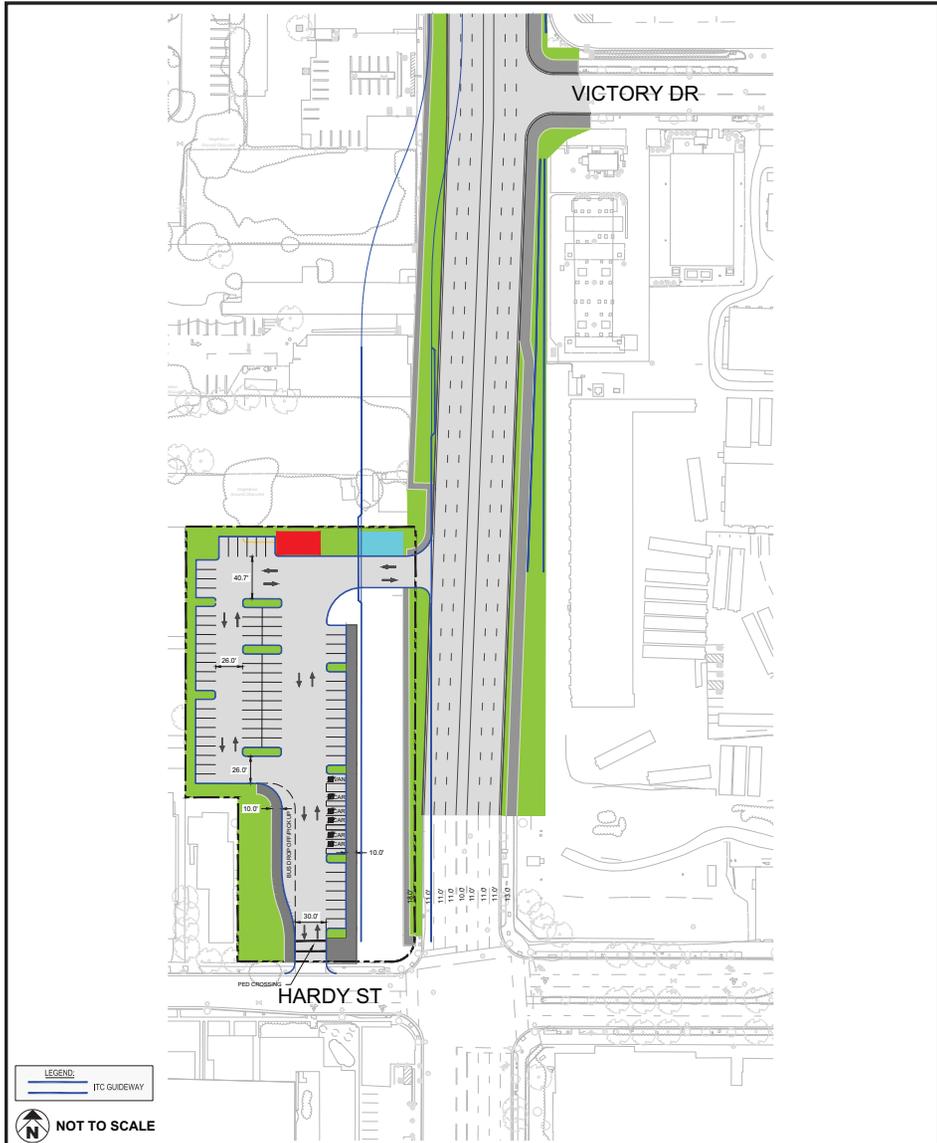
Illustrative and subject to adjustments as part of finalization during final design

FIGURE 3.0-22

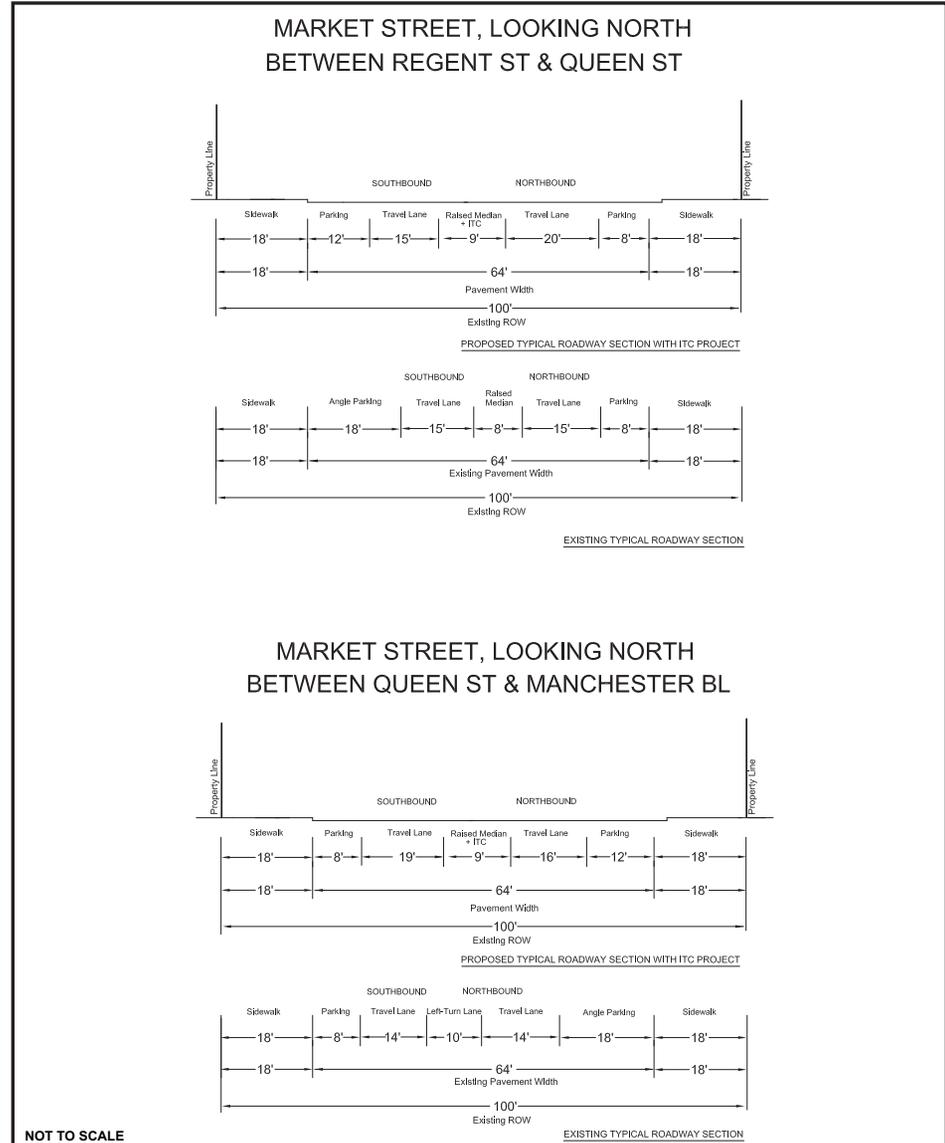
Prairie Avenue Conceptual Striping Plan –  
Arbor Vitae Street to Victory Street



251-003-20

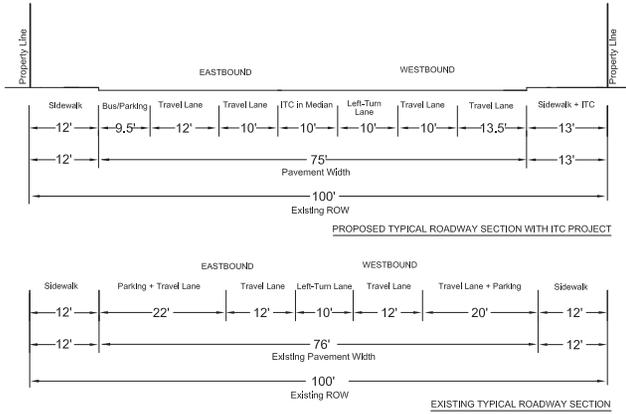


SOURCE: Raju Associates - 2021 Illustrative and subject to adjustments as part of finalization during final design  
**FIGURE 3.0-23**

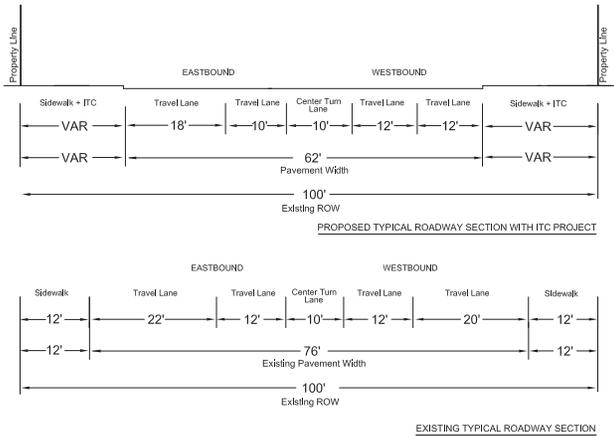


SOURCE: Raju Associates - 2021 Illustrative and subject to adjustments as part of finalization during final design  
**FIGURE 3.0-24**

MANCHESTER BOULEVARD, LOOKING WEST  
BETWEEN MARKET ST & LOCUST AV



MANCHESTER BOULEVARD, LOOKING WEST  
BETWEEN LOCUST AV & HILLCREST BL



NOT TO SCALE

SOURCE: Raju Associates - 2021

Illustrative and subject to adjustments as part of finalization during final design

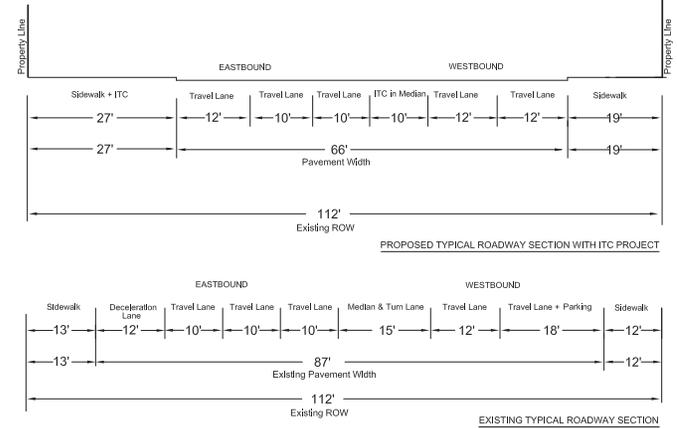
FIGURE 3.0-25



Manchester Boulevard –  
Typical Cross Sections Market Street to Hillcrest Boulevard

251-003-20

MANCHESTER BOULEVARD, LOOKING WEST  
BETWEEN HILLCREST BL & SPRUCE AV



NOT TO SCALE

SOURCE: Raju Associates - 2021

Illustrative and subject to adjustments as part of finalization during final design

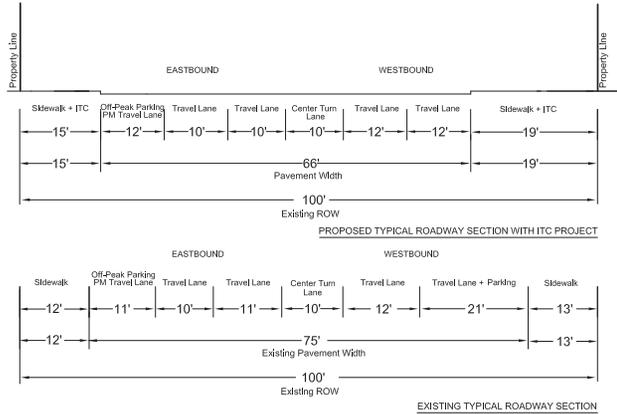
FIGURE 3.0-26



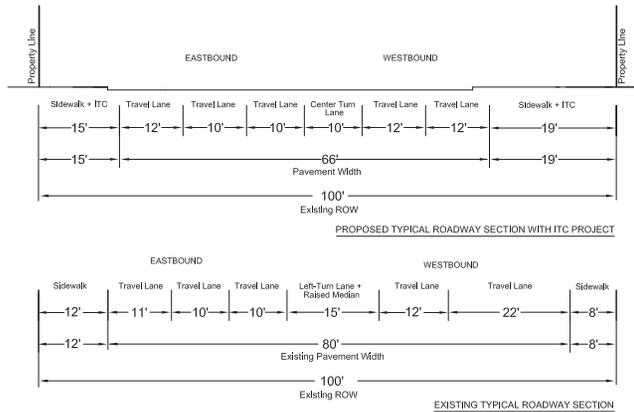
Manchester Boulevard –  
Typical Cross Sections Hillcrest to Tamarack Avenue

251-003-20

MANCHESTER BOULEVARD, LOOKING WEST  
BETWEEN TAMARACK AV & OSAGE AV



MANCHESTER BOULEVARD, LOOKING WEST  
BETWEEN OSAGE AV & PRAIRIE AV



NOT TO SCALE

SOURCE: Raju Associates - 2021

Illustrative and subject to adjustments as part of finalization during final design

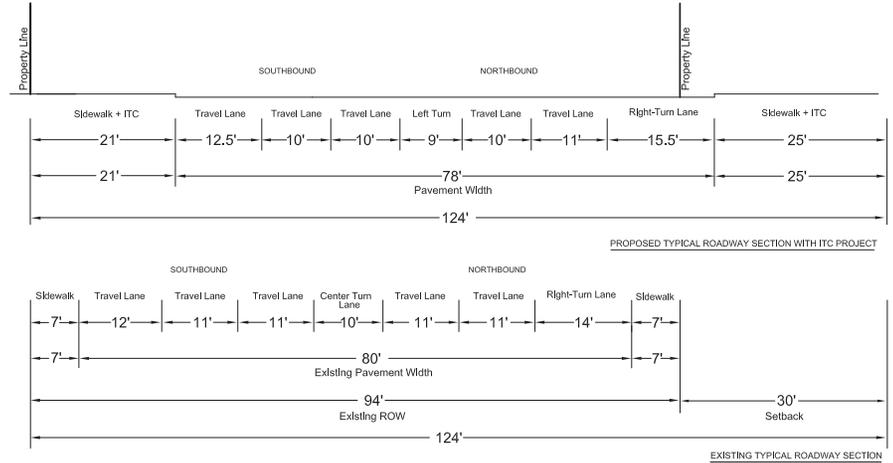
FIGURE 3.0-27



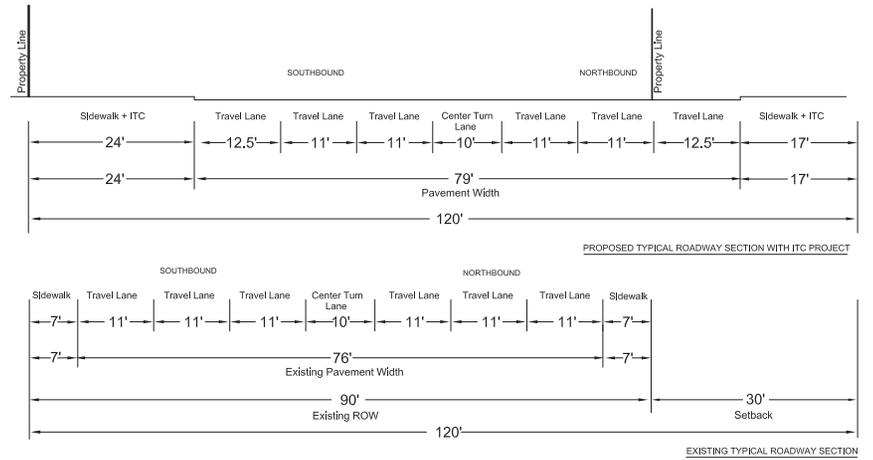
Manchester Boulevard –  
Typical Cross Sections Tamarack Avenue to Prairie Avenue

251-003-20

PRAIRIE AVENUE, LOOKING NORTH  
BETWEEN MANCHESTER BL & NUTWOOD ST



PRAIRIE AVENUE, LOOKING NORTH  
BETWEEN NUTWOOD ST & KELSO ST/PINCAY DR



NOT TO SCALE

SOURCE: Raju Associates - 2021

Illustrative and subject to adjustments as part of finalization during final design

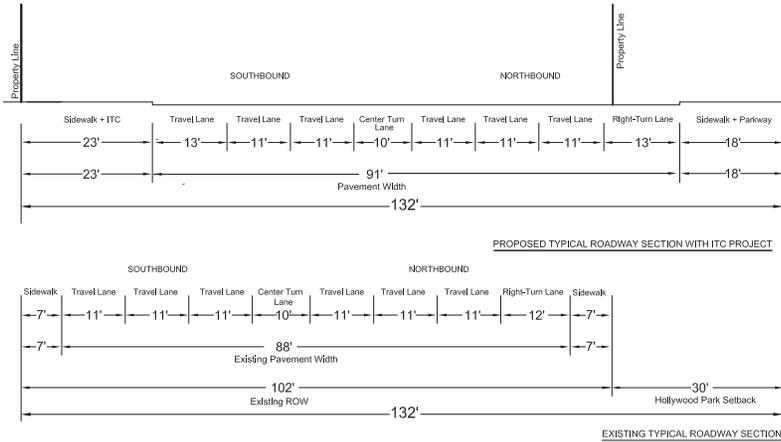
FIGURE 3.0-28



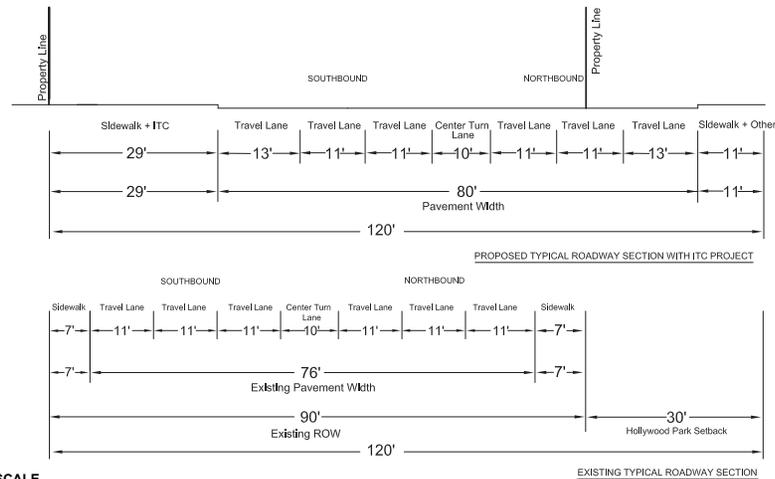
Prairie Avenue –  
Typical Cross Sections Manchester Boulevard to Kelso Street/Pincay Drive

251-003-20

PRAIRIE AVENUE, LOOKING NORTH  
BETWEEN KELSO ST/PINCAY DR & LA PALMA DR



PRAIRIE AVENUE, LOOKING NORTH  
BETWEEN LA PALMA DR & BUCKTHORN ST/TOUCHDOWN DR



NOT TO SCALE

SOURCE: Raju Associates - 2021

Illustrative and subject to adjustments as part of finalization during final design

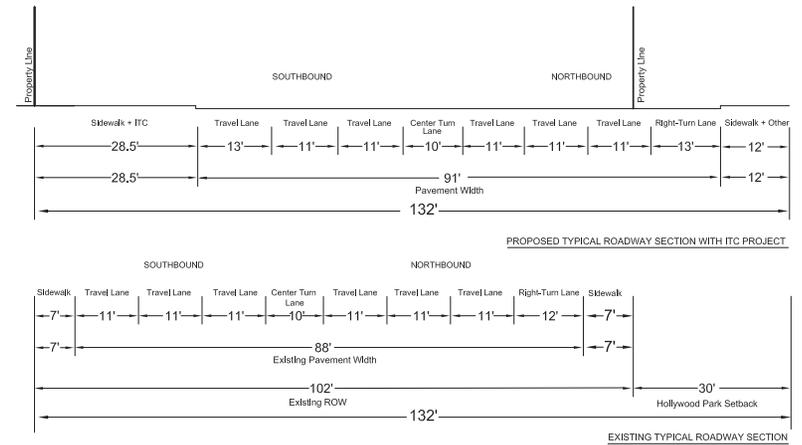
FIGURE 3.0-29



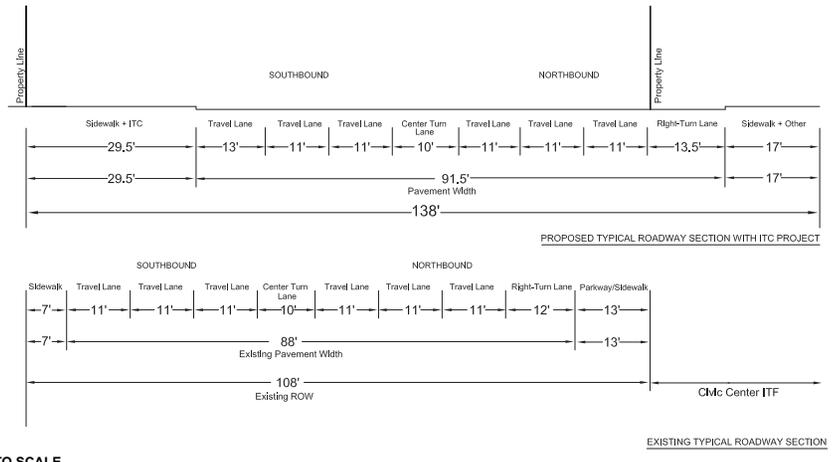
Prairie Avenue – Typical Cross Sections Kelso Street/  
Pincay Drive to Buckthorn Street/Touchdown Drive

251-003-20

PRAIRIE AVENUE, LOOKING NORTH  
BETWEEN BUCKTHORN ST/TOUCHDOWN DR & ARBOR VITAE ST



PRAIRIE AVENUE, LOOKING NORTH  
BETWEEN ARBOR VITAE ST & VICTORY ST



NOT TO SCALE

SOURCE: Raju Associates - 2021

Illustrative and subject to adjustments as part of finalization during final design

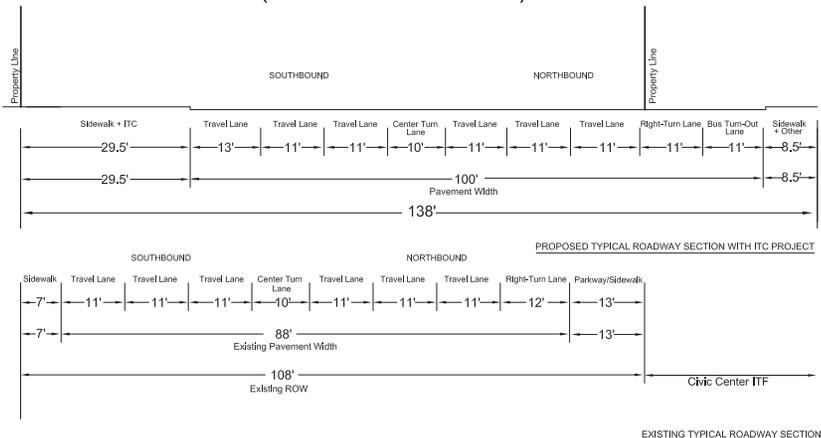
FIGURE 3.0-30



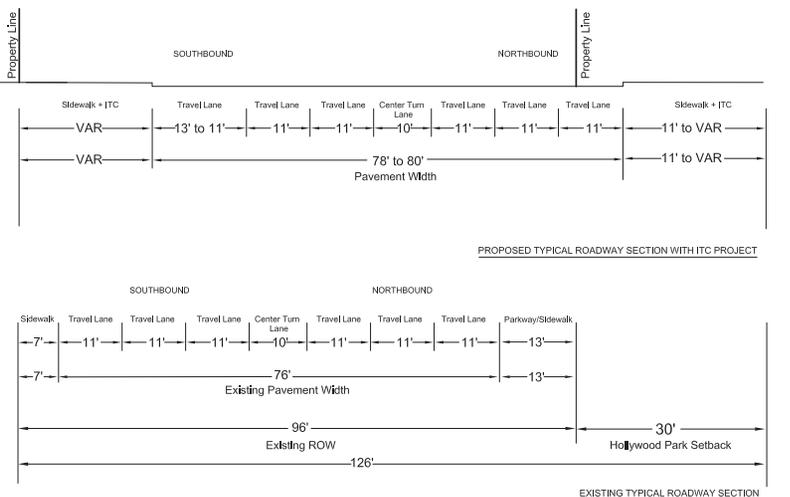
Prairie Avenue – Typical Cross Sections Buckthorn Street/Touchdown Drive to Victory Street

251-003-20

### PRAIRIE AVENUE, LOOKING NORTH BETWEEN ARBOR VITAE ST & VICTORY ST (WITH BUS TURN-OUT)



### PRAIRIE AVENUE, LOOKING NORTH BETWEEN VICTORY ST & HARDY ST



NOT TO SCALE

SOURCE: Raju Associates - 2021

Illustrative and subject to adjustments as part of finalization during final design

FIGURE 3.0-31



## Prairie Avenue – Typical Cross Sections Victory Street to Hardy Street

251-003-20

### Market Street between Florence Avenue and Manchester Boulevard

Market Street between Florence Avenue and Manchester Boulevard will include the same number of lanes as existing conditions (one lane in either direction). No change to roadway throughput or capacity is proposed as part of the Project. The speed limit along Market Street will remain at 25 mph, similar to existing conditions. Conceptual roadway striping plans and typical cross-sections are included in Attachment A-1.

At the intersections of Market Street/Florence Avenue and Market Street/Manchester Boulevard, lane configurations and traffic controls will mostly remain similar to existing conditions, resulting in very little to no changes to intersection capacities. At the intersections of Market Street/Regent Street and Market Street/Queen Street, there would be changes to the lane configurations, but traffic controls proposed at these intersections would not be changed. A brief description of the resulting lane configurations at the intersections along this stretch of Market Street with the ITC Project is summarized below:

- **Intersection of Market Street/Florence Avenue** – There would be no changes to the lane configurations and traffic control due to the Project at this signalized intersection, compared to existing conditions. Similar to existing conditions, the northbound approach would provide a left-turn lane and a right-turn lane. The eastbound approach would provide two through lanes and a shared through/right-turn lane, while the westbound approach would provide a left-turn lane and two through lanes.
- **Intersection of Market Street/Regent Street** – The Project would result in the removal of the northbound left-turn lane at this signalized intersection compared to existing conditions. The northbound approach would provide a shared left-/through/right-turn lane. The adjacent D3 (Market Gateway) Project (anticipated to be completed in 2022) would modify the southbound approach by removing the right-turn lane, resulting in a shared left-/through/right-turn lane. The Project would not change the southbound, eastbound, and westbound approaches. The eastbound and westbound approaches would both provide a left-turn lane and a shared through/right-turn lane. No change to traffic control (signal) at this intersection are proposed with the ITC Project compared to existing conditions.
- **Intersection of Market Street/Queen Street** – As a result of the Project, the northbound and southbound approaches would provide a shared left-/through/right-turn lane, removing the separate left-turn lanes, compared to existing conditions. The southbound approach would provide a shared left-turn/through lane and a separate right-turn lane. The Project would not change the eastbound and westbound approaches. The eastbound and westbound approaches would both provide a shared left-/through/right-turn lane. No change to traffic control (signal) at this intersection are proposed with the ITC Project compared to existing conditions.
- **Intersection of Market Street/Manchester Boulevard** - There would be no changes to the lane configurations or traffic control due to the ITC Project at this signalized intersection compared to existing conditions. The northbound and southbound approaches would provide a left-turn lane and

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a shared through/right-turn lane. The eastbound and westbound approaches would both provide a left-turn lane, one through lane and a shared through/right-turn lane.

#### Manchester Boulevard between West of Market Street and Prairie Avenue

Manchester Boulevard between Market Street and Prairie Avenue will include the same number of lanes as existing conditions, i.e., two lanes in either direction with turn lanes at intersections between Market Street and Hillcrest Boulevard; and two lanes / three lanes in the westbound / eastbound directions, respectively, with turn lanes at intersections between Hillcrest Boulevard and Prairie Avenue. No change to roadway capacity or traffic control is proposed as part of the Project. The speed limit along Manchester Boulevard will remain at 35 mph, similar to existing conditions.

Lane configurations at intersections will mostly remain similar to existing conditions at all locations within that stretch, resulting in no changes to intersection capacities and little to no reductions in turn-lane storage lengths would occur at any of the intersections within this stretch, as part of the ITC Project. Minor modifications to lane configurations at the intersection of Manchester Boulevard and Prairie Avenue may be required or desired based on prevailing demands at the time of construction of the Project. This could be achieved by restriping at the time of implementation of the Project. A brief description of the resulting lane configurations at the intersections along this stretch of Manchester Boulevard as a result of the ITC Project is summarized below:

- **Market Street/Manchester Boulevard** - There would be no changes to the lane configurations and traffic control (signal) due to the Project at this signalized intersection compared to existing conditions. The northbound and southbound approaches would provide a left-turn lane and a shared through/right-turn lane. The eastbound and westbound approaches would provide a left-turn lane, one through lane and a shared through/right-turn lane.
- **Intersection of Locust Street/Manchester Boulevard** - There would be no changes to the lane configurations and traffic control (signal) due to the Project at this signalized intersection compared to existing conditions. The northbound and southbound approaches would provide a shared left/through/right-turn lane. The eastbound and westbound approaches would provide a left-turn lane, one through lane and a shared through/right- turn lane.
- **Intersection of Hillcrest Boulevard/Manchester Boulevard** - There would be no changes to the lane configurations and traffic control (signal) due to the Project at this signalized intersection compared to existing conditions. The northbound and southbound approaches would provide a left turn lane, a through lane and a right-turn lane. The eastbound and westbound approaches would provide a left-turn lane, one through lane and a shared through/right-turn lane.
- **Intersection of Spruce Avenue/Manchester Boulevard** - There would be small changes to the lane configurations and traffic control (signal) due to the Project at this signalized intersection compared

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to existing conditions. The northbound approach would provide a shared left/through/right-turn lane similar to existing conditions. The southbound approach is a driveway and would provide a right-turn lane only. The eastbound approach would provide two through lanes and a separate right-turn lane (in the evening peak period, on- street parking restriction allows this right turn lane to function as a shared through/right- turn lane along eastbound Manchester at this intersection). The eastbound approach left- turn lane to the small driveway would be removed. The westbound approach would provide a left-turn lane, one through lane and a shared through/right-turn lane, similar to existing conditions. Due to the low volume of traffic making the left-turn from the eastbound Manchester Boulevard to the Driveway, removal of the left-turn pocket and restricting the eastbound left-turns into that driveway would have minimal effect on the circulation at this intersection.

- **Intersection of Tamarack Avenue/Manchester Boulevard** - There would be no changes to the lane configurations or traffic control (stop-sign at Tamarack Avenue northbound approach) due to the Project at this un-signalized intersection compared to existing conditions. The northbound approach would provide a shared left-/right-turn lane. The eastbound approach would provide two through lanes and a separate right-turn lane (except in the evening peak period, when on-street parking restriction allows this right turn lane to function as a shared through/right-turn lane along eastbound Manchester at this intersection). The westbound approach would provide a left-turn lane and two through lanes.
- **Intersection of Osage Avenue/Manchester Boulevard** - There would be no changes to the lane configurations and traffic control (stop-signs at Osage Avenue northbound and southbound approaches) due to the Project at this un-signalized intersection compared to existing conditions. The northbound and southbound approaches would provide a shared left-/through/right-turn lane. The westbound approach would provide a left-turn lane, one through lane and a shared through/right-turn lane. The eastbound approach would provide a left-turn lane, one through lane and a shared through/right-turn lane during the morning peak hours and off-peak hours. During the evening peak hours, with on-street parking restrictions, the eastbound approach would provide a left-turn lane, two through lanes and a shared through/right-turn lane.
- **Intersection of Prairie Avenue/Manchester Boulevard** - There would be no changes to the lane configurations and traffic control (signal) due to the Project at this signalized intersection compared to existing conditions. The northbound approach would provide a left-turn lane, two through lanes and a separate right-turn lane. The southbound approach would provide a left-turn lane, two through lanes and a shared through/right-turn lane. The eastbound approach would provide a left-turn lane, two through lanes and a shared through/right-turn lane. The westbound approach would provide a left-turn lane, two through lanes and a separate right-turn lane.

#### Prairie Avenue between Manchester Boulevard and Hardy Street

Prairie Avenue between Manchester Boulevard and Hardy Street will include the same number of lanes as existing conditions (three lanes in either direction with a central turn lane including the turn lanes at

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intersections). No change to roadway capacity is proposed as part of the Project. The speed limit along Prairie Avenue will remain at 40 mph, similar to existing conditions. No on- street parking will be allowed along Prairie Avenue within this stretch similar to existing conditions.

Lane configurations and traffic control at intersections will mostly remain similar to existing conditions at all locations within that stretch, resulting in no changes to intersection capacities. Additionally, no reductions in storage lengths are proposed at the intersection turn lanes as part of the ITC Project. Minor modifications to lane configurations at the Manchester Boulevard / Prairie Avenue intersection may be required or desired, based on prevailing traffic demands at the time of implementation of the Project. A brief description of the resulting lane configurations at the intersections along this stretch of Prairie Avenue due to the ITC Project is summarized below:

- **Intersection of Prairie Avenue/Manchester Boulevard** - There would be no changes to the lane configurations and traffic control (signal) due to the Project at this signalized intersection, compared to existing conditions. The northbound approach would provide a left-turn lane, two through lanes and a separate right-turn lane. The southbound approach would provide a left-turn lane, two through lanes and a shared through/right-turn lane. The eastbound approach would provide a left-turn lane, two through lanes and a shared through/right-turn lane. The westbound approach would provide a left-turn lane, two through lanes and a separate right-turn lane.
- **Intersection of Prairie Avenue/Nutwood Street** - There would be no changes to the lane configurations and traffic control (stop-sign control at the eastbound Nutwood Street approach) due to the Project at this unsignalized 'T' intersection. The northbound approach would provide a left-turn lane (central turn lane), three through lanes. The southbound approach would provide two through lanes and a shared through/right-turn lane. The eastbound approach would provide a shared left-/right-turn lane.
- **Intersection of Prairie Avenue/Kelso Street-Pincay Drive** - There would be no changes to the lane configurations and traffic control (signal) due to the Project at this signalized intersection, compared to existing conditions. The northbound approach would provide a left-turn lane, three through lanes and a separate right-turn lane. The southbound approach would provide a left-turn lane, two through lanes and a shared through/right-turn lane. The eastbound approach would provide a left-turn lane and a shared through/right- turn lane. The westbound approach would provide a left-turn lane, one through lane and a separate right-turn lane.
- **Intersection of Prairie Avenue/La Palma Drive-Stadium Driveway** - There would be no changes to the lane configurations and traffic control (stop-signs at the LA Palma Drive- Stadium Driveway approaches) due to the Project at this unsignalized intersection, compared to existing conditions. The northbound and southbound approaches would provide a left-turn lane, two through lanes and a shared through/right-turn lane. The eastbound approach would provide a shared left-/right-turn lane. The westbound approach would provide a right-turn lane.

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- **Intersection of Prairie Avenue/Buckthorn Street-Touchdown Drive** - There would be no changes to the lane configurations and traffic control (signal) due to the Project at this signalized intersection, compared to existing conditions. The northbound approach would provide a left-turn lane, three through lanes and a separate right-turn lane. The southbound approach would provide a left-turn lane, two through lanes and a shared through/right-turn lane. The eastbound approach would provide a left-turn lane and a shared through/right-turn lane. The westbound approach would provide a left-turn lane, one through lane and a separate right-turn lane.
- **Intersection of Prairie Avenue/Arbor Vitae Street** - There would be no changes to the lane configurations and traffic control (signal) due to the Project at this signalized intersection, compared to existing conditions. The northbound approach would provide a left-turn lane, three through lanes and a separate right-turn lane. The southbound approach would provide a left-turn lane, two through lanes and a shared through/right-turn lane. The eastbound approach would provide a left-turn lane and a shared through/right-turn lane. The westbound approach would provide a left-turn lane, one through lane and a separate right-turn lane.
- **Intersection of Prairie Avenue/Victory Street** - There would be no changes to the lane configurations and traffic control (stop sign at Victory Street westbound approach) due to the Project at this unsignalized 'T' intersection, compared to existing conditions. The northbound approach would provide two through lanes and a shared through/right-turn lane. The southbound approach would provide three through lanes. The westbound approach would provide a right-turn lane.
- **Intersection of Prairie Avenue/Hardy Street** - There would be no changes to the lane configurations and traffic control (signal) due to the Project at this signalized intersection, compared to existing conditions. The northbound approach would provide a left-turn lane, three through lanes and a separate right-turn lane. The southbound approach would provide a left-turn lane, two through lanes and a shared through/right-turn lane. The eastbound approach would provide a left-turn lane and a shared through/right-turn lane. The westbound approach would provide a left-turn lane, a shared left-turn/through lane and a separate right-turn lane.

### **Pick-Up /Drop-Off Areas and Parking Lots**

#### **Market Street Segment**

A surface parking lot with approximately 650 parking spaces at the adjacent Florence Avenue and Market Street Station site, would be provided after construction of the Project is completed. This site will be initially used for construction staging. This public parking at Florence and Market Street is proposed to accommodate anticipated public parking demands, especially on event days, for those desiring to access the event venues and mixed-use areas at the Forum, the LASED and IBEC areas. While the ITC is designed to increase transit ridership along the Metro Rail system, the City anticipates that the provision of additional public parking would support use of public transit and attract patrons to the downtown Inglewood area along Market Street. Moreover, this surface parking lot at the Station site would provide

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the replacement parking spaces for the reduced parking along Locust Street and Regent Street where Pick-up/Drop-off areas are proposed.

Pick-up and Drop-off areas would be provided along the west side of Locust Street south of Florence Avenue, as well as along the north-side of Regent Street between Locust Street and Market Street. A reduction in on-street parking spaces of approximately 13 spaces along Regent Street and 17 spaces along Locust Street would occur due to the Pick-up / Drop-off areas and the surface parking lot driveways proposed as part of the ITC Project. Additionally, the parking lot would provide replacement parking for 37 on-street parking spaces along Market Street that would be removed to accommodate the Project.

Conceptual roadway striping plans for the Locust Street segment between Florence Avenue and Regent Street and for the Regent Street segment between Market Street and Locust Street indicating the Pick-up/Drop-off areas and conceptual parking layout plans at the surface parking lots at the Market Street / Florence Avenue Station site are provided in **Figure 3.0-32: Market Street/Florence Avenue Station Proposed Parking Plan** and **Figure 3.0-33: 150 S. Market Street Proposed Parking Plan**.

#### Manchester Boulevard Segment

There are currently 81 on-street parking spaces along Manchester Boulevard within this segment. The proposed Project would result in reduction of approximately 48 metered on-street parking spaces. An off-street surface parking lot would be provided at the northeast corner of Market Street and Manchester Boulevard. This surface parking lot is anticipated to provide approximately 50 parking spaces, replacing 6 existing spaces, and obtaining access off of the alley east of the site.

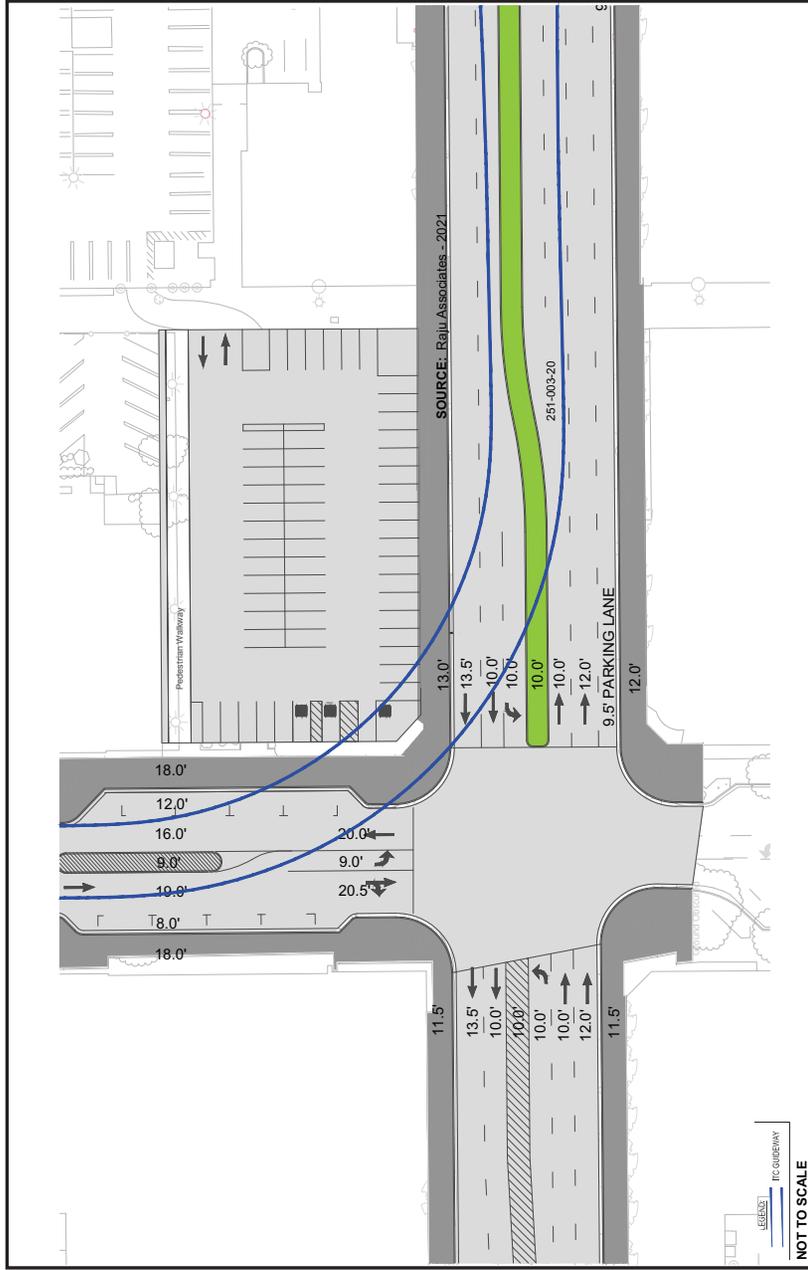
#### Prairie Avenue Segment

A surface parking lot is proposed at the Hardy Street Station located at the northwest corner of the intersection of Prairie Avenue and Hardy Street as shown in **Figure 3.0-34: Prairie Avenue/Hardy Street Station Proposed Parking Plan**. This parking lot would have approximately 80 parking spaces and a shuttle bus pick-up and drop-off area. This lot would be used for public parking, TNCs and shuttle bus pick-up and drop-off operations during events.

#### Sidewalks

Sidewalks on both sides of the street segments along the alignment will be provided by the proposed Project consistent with the requirements of the ADA. The acquisition of temporary and/or permanent easements may be required for these sidewalks. Crosswalks will be provided at intersections similar to existing conditions.

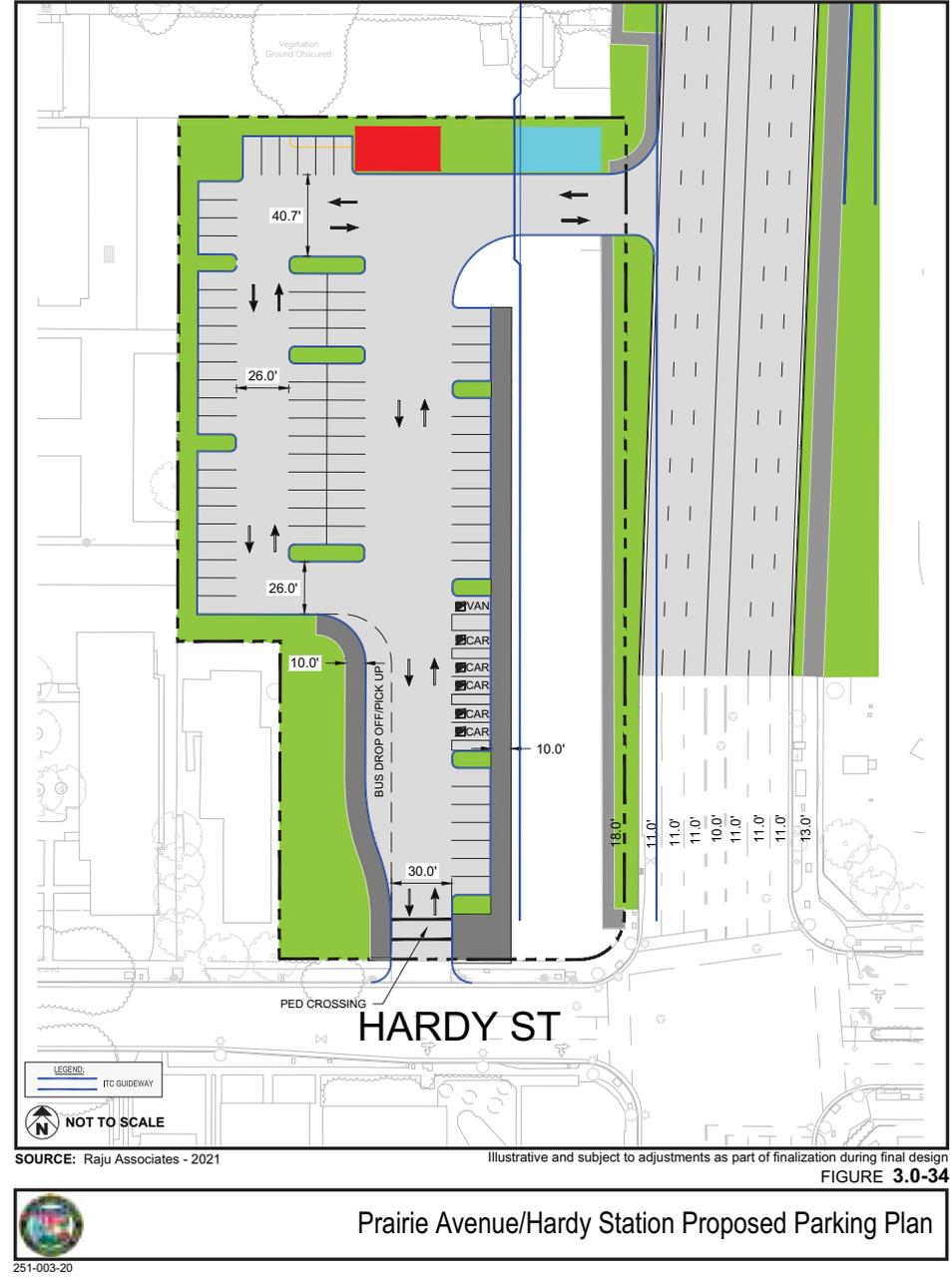




### 150 S. Market Street Proposed Parking Plan



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### 3.5.7 Utility Improvements, Upgrades, and Relocations

The proposed Project would require utility systems improvements and upgrades. Based upon preliminary review, it appears that some utility relocations will be required, but these relocations would be generally minor in nature for a project of this size. The Project will not impact the existing utility substation located within the HPSP area that serves SoFi Stadium. The location of utilities is based on a review of existing documentation and non-evasive field confirmation methods. Physical utility pothole locating work will be conducted during the final design phase to supplement the pot-hole survey work completed to date. The design and construction of the elevated-guideway structures, stations, and support facilities would strive to avoid existing utility and other infrastructure to the extent possible. In addition to surface improvements, some utility infrastructure that cannot be avoided may need to be relocated to accommodate the guideway columns and foundations. Any affected utility infrastructure will be relocated and replaced as needed.

### 3.5.8 Design Guidelines

The Design Guidelines (see **Appendix C**) establish the City's comprehensive vision for the transit experience for City residents and patrons of downtown Inglewood and the surrounding entertainment and business venues. The guidelines are intended to integrate the design of new and existing facilities and to create a passenger experience that reflects the City's history and architecture, while providing design guidance for the proposed ITC Project. The Design Guidelines apply to all components of the ITC Project, including the ATS system, guideways, stations, support facilities, and parking areas. These guidelines also apply to areas of the public realm built by the ITC Project including streetscapes, station plazas, roadways, and landscape areas.

The overall purpose of the Design Guidelines is to provide a framework for enhancing the experience in and around downtown Inglewood in a way that is consistent with both the existing urban context and future development vision. These guidelines encourage the development of sustainable and user-friendly spaces with a focus on unified, distinctive architecture and urban design. They will also shape a seamless interaction between a variety of users including passengers, cyclists, transit riders, and automobile drivers with an emphasis on the public experience.

The Design Guidelines also address the comprehensive wayfinding, sign and communications program proposed as part of the Project. Signs will be designed and located to provide clear information and direction for both passengers and transit passengers along the ITC alignment and around station locations. The signage guidelines include design and performance standards for both static and dynamic signage systems. Approval of a Signage and Lighting Design Plan is required that demonstrates that lighting from all proposed signs will not adversely affect nearby uses is required.

### 3.5.9 Sustainability Features

The City has developed sustainability guidelines included in the Design Guidelines that are to be incorporated into the design, construction, and operation of Project facilities. The ITC Project will be designed and constructed to achieve a minimum of Silver Award Certification under the Envision™ Sustainable Infrastructure Rating System or equivalent. The MSF will be designed and constructed to meet a LEED Silver Certification for BD+C (Building Design and Construction) under the category of Warehouses and Distribution Centers or equivalent. Sustainable measures achieved beyond Silver certification for both Envision and LEED or equivalent are encouraged and recommended.

Standards and Guidelines are identified in the areas of site design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. These measures illustrate the City's sustainability considerations including, but not limited to, the measures necessary to meet the certifications referenced above. These guidelines apply to the ATS guideway and stations, passenger walkways, parking areas, and all other components of the ITC.

The design of the individual components of the overall ITC Project will be designed to facilitate the use of other low impact forms of transportation such as walking, bicycling, carpooling, and the use of electric and alternative fuel vehicles.

To facilitate this objective, stairways and passenger pathways will be designed to be easily identified, accessible, comfortable, and visually appealing. Similarly, bike parking, carpool parking, electric vehicle charging stations and public transportation connections should be convenient and easy to locate.

The ITC Project will also incorporate landscaped outdoor spaces to reduce heat island impacts and provide stormwater detention and treatment, where possible by reducing hardscape areas and increasing landscape. Other strategies for heat island reductions identified in the Design Guidelines include the use of cool-roof materials and light-colored construction materials.

Where California Energy Efficiency Standards apply, the project will be more energy efficient than required. For energy-using equipment not governed by California Energy Efficiency Standards, best available energy efficient technologies will be used. Advanced commissioning of building systems will be conducted to ensure systems are operating as designed. To achieve energy use reduction, passive strategies taking advantage of the favorable local climate will be considered where feasible. The use of solar canopies as shade structures in addition to roof-mounted solar is another energy saving strategy that will be considered in the design of the individual components of the overall ITC Project.

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Water efficiency and conservation opportunities will be implemented to reduce or eliminate potable water use indoors and in landscape areas.

Material conservation and resource efficiency guidelines are included to reduce the environmental impact from the use of construction materials by minimizing use of virgin materials, increasing use of recycled materials, using rapidly renewable materials, using local materials, using durable materials, and looking for opportunities to reuse materials.

#### 3.5.10 Construction Commitment Program

As part of the Project, the City of Inglewood has developed a Construction Commitment Program to proactively address the effects of the construction of the Project on the community. This program, provided in **Appendix D**, includes the following programs and plans:

- Business Community and Support Program
- Business Interruption 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 will establish a Project Task Force to review implementation of the CCP.

The Transit Access and Circulation Program will include coordination with Metro and any other transit service providers to ensure access to bus transit stops and bus circulation are always maintained, unless infeasible and temporary closure is approved by the City.

The Construction Staging and Traffic Control Program will be developed by members of the Project Task Force will 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

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- 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.

All haul routes and activities will 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, shall be prohibited on City streets at all times except in defined workspace areas unless otherwise approved by the City.

Construction noise reduction measures in this Program require the use of construction equipment that generates the least amount of noise (to the extent feasible), use of temporary noise barriers, and restrictions on the use of heavy equipment that create vibration near sensitive uses and buildings. Contact information for a Community Affairs Liaison will be posted throughout the construction area.

The air emissions reduction measures require use of the best commercially available equipment meeting the highest standard for minimizing air emissions as feasible and the use of electric powered equipment or equipment not powered by diesel engines where possible.

All lighting needed to support construction activities will be required to meet defined standards to avoid impacts to adjacent uses and all stockpile area will be required to be in the least visible areas as approved by the City.

#### 3.6 PROPERTY ACQUISITIONS

The proposed Project would require a number of full and partial property and air rights acquisitions and easements or leases for construction and operation of the guideway, stations, MSF, and other support facilities included in the Project as identified in **Table 3.0-5: Anticipated Project Acquisitions** and otherwise described in this Section.

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3.6.1 Guideway

At the northeast corner of the Market Street and Manchester Boulevard intersection, the guideway would partially extend beyond the public right-of-way and into the private property at 150 S. Market Street which currently is occupied by a 2-story commercial building (see **Table 3.0-5**). Additionally, an approximately 50-space surface public parking lot will be developed at this location as part of the proposed Project. This lot will be created by combining the currently private property at 150 S. Market Street with an adjacent existing public surface parking lot (which currently contains 6 parking spaces). As a result, acquisition, and demolition of the property at 150 S. Market Street is necessary to implement the proposed Project.

The guideway will also need to pass from Manchester Boulevard to access the MSF just north of the intersection of Manchester Boulevard and E. Spruce Avenue. The acquisition associated with this is more fully described below in *Section 3.6.4*.

The guideway will also need to pass from Manchester Boulevard to access the MSF just north of the intersection of Manchester Boulevard and E. Spruce Avenue. This proposed acquisition is more fully described below in *Section 3.6.4*.

Further along the alignment, the guideway will also pass through a private property at 401 S. Prairie Avenue as it transitions from the Manchester Boulevard stretch to the Prairie Avenue stretch of the alignment. The acquisition associated with this is more fully described below in *Section 3.6.2*. The proposed Project also requires moving one lane of Prairie Avenue to the east to maintain the existing roadway capacity of Prairie Avenue while accommodating the columns to support the guideway, stations, vertical circulation elements, ADA-compliant sidewalks, and landscaping. This relocation requires the acquisition of private property for public right-of-way purposes to expand Prairie Avenue by up to a maximum of 30 feet to the east of its current location, including frontage along the Forum property at 3900 W. Manchester Boulevard and frontage on the east side of Prairie Avenue in the HPSP area.

The guideway along Prairie from south of Arbor Vitae to the Prairie Avenue/Hardy Street station extends into properties west of Prairie. As a result, acquisition of these parcels is needed and demolition of some existing facilities will be necessary. Further details of these parcels are noted in *Section 3.6.2* below.

Finally, to the south of Arbor Vitae Street, the guideway will expand beyond the existing public right-of-way onto currently private property, requiring the acquisition of some or all of 6 additional private parcels. The guideway will ultimately pass-through private property at 1035 S. Prairie Ave. to terminate at the Prairie Avenue/Hardy Street Station. The property acquisition associated with these improvements are more fully described below in *Section 3.6.2*.

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Table 3.0-5  
Anticipated Project Acquisitions

APN #	Property Address	Existing Use/Primary Business	Anticipated Acquisition Type	Project Needs
4015-019-902	317 E. Florence Ave	Future Downtown Inglewood Station of K Line	Easement or partial acquisition	Market Street/Florence Avenue Station elevated passenger walkway connection
4015-019-904	319 E. Florence Ave	Future Downtown Inglewood Station of K Line	Easement or partial acquisition	Market Street/Florence Avenue Station elevated passenger walkway connection
4015-019-905	325 E. Florence Ave	Future Downtown Inglewood Station of K Line	Easement or partial acquisition	Market Street/Florence Avenue Station elevated passenger walkway connection
4015-019-906	327 E. Florence Ave	Future Downtown Inglewood Station of K Line	Easement or partial acquisition	Market Street/Florence Avenue Station elevated passenger walkway
4015-019-907	333 E. Florence Ave	Future Downtown Inglewood Station of K Line	Easement or partial acquisition	Market Street/Florence Avenue Station elevated passenger walkway
4015-027-030	310 E. Florence Ave	Restaurant - Antojitos Martin (Snack & Juice Bar)	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-031	300 E. Florence Ave	Restaurant- Fiesta Martin Bar and Grill	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-032	254 N. Market St	Small Businesses and Restaurants - House of Tacos, Water 4 U, Baja Inc. Mailbox Rentals, Amar's Wholesale Flowers, New Orleans Breakfast Take Out	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-033	250 N. Market St	O'Reilly Auto Parts	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-035	236 N. Market St	Parking Lot	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-020	234 N. Market St	Parking Lot	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-042	Address Not Available	Parking Lot	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-022	226 N. Market St	Parking Lot	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-052	Address Not Available	Parking Lot	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking

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APN #	Property Address	Existing Use/Primary Business	Anticipated Acquisition Type	Project Needs
4015-027-051	200 N. Market St	No Existing Business; Abandoned Building	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-038	240 N. Market St	Small Businesses – Silk Nails, Advance America, Ingewood Optometric Center, Ingewood Beauty Supply, Ingewood Beauty Salon	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-040	230 N. Market St	Clothing Store - DD's Discounts Store	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-041	224 N. Market St	GMD Store (general department store)	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-049	222 N. Market St	CVS Pharmacy	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-050	210 N. Market St	Westchester Dental Care, Randy's Donuts and Chinese Foot To-Go, Luxe Gold Salon, Citifund Tax Financial & Notary / Selwyn's Jewelry / Senior Corner	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4021-010-901	Address Not Available	Parking Lot	Full Acquisition	Construction staging and future parking
4021-010-015	150 S. Market St.	World Hit and Boot Mart / Commercial	Full acquisition	Guideway, columns, construction staging, and future parking
4021-024-015	500 E. Manchester Blvd.	Retail Commercial Center with Gas Station, Planet Fitness, and Vons grocery store (with Starbucks and US Bank branch located inside Vons)	Partial Acquisition	Maintenance and Storage Facility, guideway, power distribution system substation, construction staging, and future parking
4021-036-049 4021-036-027	401 S. Prairie Ave.	Vacant	Full Acquisition	Prairie Ave./Manchester Blvd. Station, guideway, construction staging, and future parking
4024-008-015	923 S. Prairie Avenue	Vacant Buildings/Surface Parking Lot	Easements or partial acquisition	Guideway and construction staging
4024-009-004	937 S. Prairie Avenue	Vacant/Undeveloped	Easements or partial acquisition	Guideway and construction staging
4024-009-003 4024-009-005	945 S. Prairie Avenue	Retail Commercial/Restaurant	Full acquisition, partial acquisition, or easements	Guideway and construction staging
4024-009-007	1003 S. Prairie Avenue	Office-Warehouse/Peak Performance Training Center	Full acquisition, partial acquisition, or easements	Guideway and construction staging

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APN #	Property Address	Existing Use/Primary Business	Anticipated Acquisition Type	Project Needs
4024-009-008	1007 S. Prairie Avenue	Vacant/Undeveloped	Full acquisition, partial acquisition, or easements	Guideway and construction staging
4024-009-015	1011 S. Prairie Avenue	Vacant Buildings/Surface Parking Lot	Full acquisition, partial acquisition, or easements	Guideway and construction staging
4024-009-033	1035 S. Prairie Ave.	Retail Commercial Center with several restaurants, nail/hair salons, retail commercial businesses, tax service, medical office	Full Acquisition	Prairie Ave./Hardy St. Station, power distribution system substation (potential), vertical circulation, guideway, columns, construction staging, and future parking
4025-001-002	3900 W. Manchester Blvd.	The Forum (parking) Commercial Recreation	Easement or partial acquisition	Roadway, sidewalks, and parkway, and elevated passenger walkway connection from Prairie Ave./Manchester Blvd. Station
4025-011-064	600 S. Prairie Ave.	Parking Lot	Easement or partial acquisition	Up to 30' for roadway, sidewalks, and parkway
4025-011-065	600 S. Prairie Ave.	Parking Lot	Easement or partial acquisition	Up to 30' for roadway, sidewalks, and parkway
4025-011-901	Address Not Available	City of Ingewood Intermodal Transit Facility	Easement or partial acquisition	Roadway, sidewalks, and parkway
4025-011-086	Address Not Available	Parking Lot	Easement or partial acquisition	Up to 30' for elevated passenger walkway connection to Prairie Avenue/Hardy Street Station, roadway, sidewalks, and parkway,

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### 3.6.2 Stations

The Market Street/Florence Avenue station, along with the accompanying surface parking lot and multimodal pick-up and drop-off area, is proposed on private property located between Florence Avenue and Regent Street. As shown in **Table 3.0-5**, acquisition of 15 parcels is proposed to accommodate the Market Street/Florence Avenue Station and the accompanying parking and pick-up/drop-off areas. Passenger access points to connect the station to the Metro K Line Downtown Inglewood station would extend outside the right-of-way and land in the adjacent properties where the Downtown Inglewood Station is located. Easements or other property rights for columns, vertical circulation, and passenger access points will likely be required; additional coordination with Metro will help define the exact rights needed.

The Prairie Avenue/Manchester Boulevard station and accompanying surface parking lot is proposed on two contiguous private parcels under common ownership that are on the southwest corner of the intersection of Prairie Avenue and Manchester Boulevard. Acquisition of these parcels is proposed. An elevated passenger walkway across Prairie Avenue to provide access to the Forum would also require an easement or partial acquisition on the Forum property for this passenger walkway connection.

The Prairie Avenue/Hardy Street station and accompanying surface parking lot is proposed on two contiguous private parcels under common ownership located on the southwest corner of the intersection of Prairie Avenue and Hardy Street. Acquisition of these parcels is proposed. As shown in **Table 3.0-5** and discussed in *Section 3.6.1* above, acquisition (partial or full) of 7 additional parcels north of 1035. S. Prairie Avenue is also proposed to accommodate the guideway north of this station.

### 3.6.3 Construction Staging and Parking

As described above, the proposed Project includes providing additional public parking in certain locations along the ITC alignment. These parking areas will be used as staging areas during construction but will ultimately provide public parking needed to support use of the ITC Project and the revitalization of Downtown Inglewood, and also replace public parking on streets and one existing public parking lot that will be removed to implement the ITC Project. Additional properties identified in **Table 3.0-5** or described in *Section 3.6.5* will also be used as staging areas during construction.

Approximately 650 parking spaces would be provided in a surface parking lot at the Market Street/Florence Avenue Station. Approximately 50 public parking spaces would be provided in a surface parking lot at 150 S. Market Street. Additional surface parking would be provided at the Prairie Avenue/Hardy Street Station. Acquisition of these sites is proposed for use as construction staging areas. After construction is complete, these sites will be improved as public parking lots. While additional parking

spaces will be provided at the MSF Facility site at 500 E. Manchester Boulevard, these spaces are will be dedicated for used by Vons's customers and MSF employees and visitors.

### 3.6.4 Maintenance and Storage Facility

The MSF and adjacent surface public parking lot would occupy the eastern portion of the parcel at 500 E. Manchester Boulevard, the southern portion of which is currently developed with a retail commercial building containing a Vons grocery store and other commercial businesses. and the northeast portion of which is currently developed with a gas station. The MSF Facility will be approximately 75,000 SF in size and is proposed on the eastern half of this block to allow the Vons store currently located on the block to remain on the site in a new building. A new Vons store is proposed to be built on the northwest corner of this block on the corner of Manchester Boulevard. and Hillcrest Boulevard. Demolition of existing structures and the gas station, along with a partial acquisition of this parcel, is proposed to implement the proposed Project.

### 3.6.5 Potential Permanent and Temporary Easements and Other Property Acquisitions

In addition to the anticipated acquisitions listed in **Table 3.0-5**, additional permanent and/or temporary easements may need to be acquired on private properties located immediately adjacent to existing street right of way to accommodate the following Project improvement conditions:

- Grading repairs and adjustments due to roadway, sidewalk, and hardscape improvements.
- Access and/or staging areas to construct guideway, columns, station, and roadway improvements.
- Utility service line reconfiguration necessary from utility mainline relocation/modifications.

## 3.7 CONSTRUCTION

Construction of the proposed ATS System is planned to occur in multiple phases over approximately 46 months between January 2024 and November 2027. Construction of the new replacement Vons store would occur prior to construction of the ATS System. The analysis of the potential impacts that would result from the construction of the Project is based on the definition of the phases of construction as defined in the Inglewood Transit Connector Project Baseline Construction Phasing Narrative, June 2021 provided in **Appendix F** to this Recirculated Draft EIR. To meet the schedule objectives, multiple phases would occur concurrently. Construction of the proposed Project is contingent on Project approvals; it is anticipated that the Inglewood City Council will consider the Project for approval in late 2021/early 2022. The general sequence of construction developed for analysis in this Draft EIR represents the best available information at the time of review. The following is a summary of the planned phases of the construction of the Project.

### 3.7.1 Construction Phasing

The construction phasing as described below represents a reasonable set of assumptions for analysis of the potential impacts from construction of the Project. The construction phasing described below will likely be refined as design and implementation of the Project progresses and a contractor is selected.

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.

#### Phase 1

Phase 1 would include demolition of buildings and site improvements on properties acquired for construction of the 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. Phase 1 construction would start in January 2024.

Phase 1 construction would include the following:

- Demolition of buildings and site improvements on property acquired for the project. As noted below, portions of the areas to be demolished will be used for construction staging.
- Utility locations for protection in place, possible utility relocations, and new utility installation for utilities such as electrical, water, gas, storm drains, sewer, temporary traffic signals, and streetlights.
- 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 Avenue.
- Site preparation for installation of the PDS substations, electrical equipment, and subsystems will occur at the MSF site and Prairie Avenue/Hardy Street Station Site.
- Installation of the primary power duct bank along Prairie Avenue.
- Installation of the power duct bank for the SCE power feed from the SCE Inglewood Substation to the MSF site.

The properties where existing buildings and site improvements will be demolished include the existing retail commercial center at Market Street and Regent Street, the commercial buildings located at 500 Manchester Boulevard, the commercial building at 150 S. Market Street on the northeast corner of Manchester and Market Street, the retail commercial center at northwest corner of Prairie Avenue and

Hardy Street, the commercial building at 925 S. Prairie Avenue, and the commercial building at 1003 S. Prairie Avenue.

After demolition, the remaining asphalt flatwork areas at the commercial plaza at Market Street and Regent Street, the commercial building at 150 S. Market Street, and the retail commercial center at northwest corner of Prairie Avenue and Hardy Street, will 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

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 2 construction would occur in 2024 through 2025.

Phase 2 construction would include the following:

- Removal of existing sidewalks, roadways, landscaping, and demolition of other improvements as needed along the guideway alignment. This work includes new or temporary pavement and asphalt for road work and sidewalks.
- Utility work including potential relocations, protection in place where feasible, and new utility installations including but not limited to electrical, water, gas, storm drains, sewer, temporary traffic signals, and streetlights.
- Drilling of the foundations for the MSF building.
- Construct new pavement, sidewalks, streetlights, traffic signals, and other infrastructure on Prairie Avenue, and shift the roadway east to its new alignment.
- The installation of a K-Rail system on the west side of Prairie Avenue to delineate the construction area. The K-Rail system will be installed approximately twenty-two feet into the public right-of-way from the westerly face of curb on Prairie Avenue, excluding sidewalks, from Hardy Street to Manchester Boulevard and maintained until construction in this area is completed. The area within the K-Rail system will be used for the mobilization of equipment, drilling, crane operations and concrete pump outriggers for the excavation and installation of concrete foundations, concrete piles, single and double concrete columns, beam girders and cantilevered bents for the aerial construction.
- Installation of buildings for the electrical equipment and subsystems at each of the two PDS substation sites.

**Phase 3**

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 will include utility relocation (if necessary), foundations, cast-in-place (CIP) columns, and setting of prefabricated buildings at the PDS substations. Phase 3 construction would occur in 2024 through 2025.

Phase 3 of construction would include the following:

- Utility work including potential relocations, protection in place where feasible, and new utility installations including but not limited to electrical, water, gas, storm drains, sewer, temporary traffic signals, and streetlights.
- Removal of existing sidewalks, roadways, landscaping, and demolition as needed. This work includes new or temporary pavement and asphalt for road work and sidewalks.
- The installation of a K-Rail system on the south side of Manchester Boulevard to delineate the construction area. The K-Rail system will be installed approximately twenty-two feet into the public right-of-way from southerly face of curb, excluding sidewalks, along Manchester Boulevard from Prairie Avenue to Market Street and maintained until construction in this area is completed. The area within the K-Rail system will be used for the mobilization of equipment, drilling, crane operations and concrete pump outriggers for the excavation and installation of concrete foundations, concrete piles, single and double concrete columns, beam girders and cantilevered bents for the aerial construction.
- Installation of buildings for the electrical equipment and subsystems at each of the two PDS substation sites.
- Construction of the support structure, columns, and cross girders for MSF building.
- The installation of two rows of K-Rail system along Market Street to delineate the construction area. The K-Rail system will be installed approximately twenty-five feet into the public right-of-way in the center of Market Street, from Manchester Boulevard to Florence Avenue. The area within the K-Rail system will be used for the mobilization of equipment, drilling, crane operations and concrete pump outriggers for the excavation and installation of concrete foundations, concrete piles, single and double concrete columns, beam girders and for supports directly under the guideway.
- Drill foundations for the ATS guideway along the west side of Prairie Avenue from Hardy Street to Manchester Boulevard, the south side of Manchester Boulevard from Prairie Avenue to Market Street, Market Street from Manchester Boulevard to Florence Avenue.
- Drill foundations for the Market Street/Florence Avenue Station.
- Drill foundations for the Prairie Ave/Manchester Boulevard Station.
- Drill foundations for the Prairie Ave/Hardy Street Station.

**Phase 4**

Phase 4 construction would include foundation work for the ATS guideway, guideway column caps along Market Street, and the MSF building deck and shell. Phase 4 activities will include utility relocation (if necessary), foundations, CIP columns, guideway column caps, and installation of equipment at the PDS substations. Phase 4 construction would occur in 2025 through 2026.

Phase 4 of construction would include the following:

- Removal of existing sidewalks, roadways, landscaping, and demolition of other improvements on Manchester as needed along the guideway alignment. This work includes new or temporary pavement and asphalt for road work and sidewalks.
- Utility work including potential relocations, protection in place where feasible, and new utility installations including but not limited to electrical, water, gas, storm drains, sewer, temporary traffic signals, and streetlights.
- Installation on of the building deck, shell, and steel roof members on the MSF building.
- Construction of the support structure, columns, and cross girders, for Market Street/Florence Avenue Station.
- Construction of the support structure, columns, and cross girders, for Prairie Ave/Hardy Street Station.
- Construction of the guideway columns and column caps along Market Street.
- Installation of electrical equipment in the PDS substation buildings.
- Reconstruct sidewalk, curb, and gutter on the west side of Prairie Avenue and south side of Manchester Boulevard.
- After construction activities on the west side of Prairie Avenue are completed, construction of the east side of Prairie Avenue would begin. A K-rail system would be installed to delineate the construction area on the east side of Prairie Avenue. The K-Rail system will be installed approximately fifteen-feet into the public right-of-way starting from the easterly face of curb, excluding sidewalk, from Hardy Street to Manchester Boulevard. If needed, a temporary easement or utility setback may be utilized to secure staging areas. The area within the K-Rail system will be used for the installation of foundations, CIP columns, single and double concrete columns, beam girders and cantilevered bents for the aerial construction.
- After construction activities on the south side of Manchester Boulevard are completed, construction of the north side of Manchester Boulevard would begin. A K-rail system would be installed to delineate the construction area on the north side of Manchester Boulevard. The area within the K-Rail system will be used for the installation of foundations, CIP columns, single and double concrete columns, beam girders and cantilevered bents for the aerial construction.
- Drill foundations for the ATS guideway along the east side of Prairie Avenue from Hardy Street to Manchester Boulevard, and the north side of Manchester Boulevard from Prairie Avenue to Market Street.

**Phase 5**

Phase 5 construction 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 will include guideway girders, guideway straddle caps, and installation of equipment at the PDS substations. Phase 5 construction would occur in 2025 through 2026.

Phase 5 construction would include the following:

- Aerial construction of the guideway on Market Street, with precast segments and/or formwork with precast trapezoidal troughs and girders. This work would include temporary closure of Market Street during the following activities for safety measures:
  - During the formwork phase, traffic would not be allowed to pass underneath the structure.
  - Traffic would not be allowed to pass underneath precast segments while they are being moved and set.
  - During formwork and concrete placement of the cast-in-place trapezoidal box trough and/or the uses of precast/prestressed “I” steel girders and platforms, temporary lane closures would be necessary.
  - The staging and holding area for the delivery of precast segments, girders, and beams will be located in the Market Street/Florence Avenue Station staging area; delivery to the construction area may require street closures.
- Construction on the interior of the MSF building.
- Aerial construction of the guideway formwork for Pincay Station with precast trapezoidal troughs and steel girders, and construction of platform, mezzanine, and vertical circulation elements.
- Aerial construction of the guideway formwork for Prairie Ave/Hardy Station with precast trapezoidal troughs and steel girders, and construction of platform, mezzanine, and vertical circulation elements.
- Aerial construction of the guideway straddle cap formwork on Manchester Boulevard. This work would include temporary closure of Manchester Boulevard during the following activities for safety measures:
  - During the formwork phase, traffic would not be allowed to pass underneath the structure.
  - During formwork and concrete placement of the cast-in-place trapezoidal box trough and/or the uses of precast/prestressed “I” steel girders and platforms. Temporary lane closures would be necessary.
  - The staging and holding area for the delivery of girders and beams will be located in the MSF staging area; delivery to the construction area may require street closures.
- Aerial construction of the guideway straddle cap formwork on Prairie Avenue. This work would include temporary closure of Prairie Avenue during the following activities for safety measures:

- During the formwork phase, traffic would not be allowed to pass underneath the structure.
  - During formwork and concrete placement of the cast-in-place trapezoidal box trough and/or the uses of precast/prestressed “I” steel girders and platforms. Temporary lane closures would be necessary.
  - The staging and holding area for the delivery of girders and beams will be located in the MSF staging area; delivery to the construction area may require street closures.
- Installation of electrical equipment in the PDS substation buildings.

**Phase 6**

Phase 6 construction 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, completion of Pincay 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 6 construction would occur in 2025 through 2026.

Phase 6 construction would include the following:

- Aerial construction of the guideway on Manchester Boulevard, with precast segments and/or formwork with precast trapezoidal troughs and girders. This work would include temporary closure of Manchester Boulevard during the following activities for safety measures:
  - During the formwork phase, traffic would not be allowed to pass underneath the structure.
  - Traffic would not be allowed to pass underneath precast segments while they are being moved and set.
  - During formwork and concrete placement of the cast-in-place trapezoidal box trough and/or the uses of precast/prestressed “I” steel girders and platforms. Temporary lane closures would be necessary.
  - The staging and holding area for the delivery of precast segments, girders, and beams will be located in the MSF staging area; delivery to the construction area may require street closures.
- Completion of the MSF including building commissioning.
- Aerial construction of the guideway on Prairie Avenue, with precast segments and/or formwork with precast trapezoidal troughs and girders. This work would include temporary closure of Prairie Avenue during the following activities for safety measures:
  - During the formwork phase, traffic would not be allowed to pass underneath the structure.
  - Traffic would not be allowed to pass underneath precast segments while they are being moved and set.
- During formwork and concrete placement of the cast-in-place trapezoidal box trough and/or the uses of precast/prestressed “I” steel girders and platforms. Temporary lane closures would be necessary.

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- The staging and holding area for the delivery of precast segments, girders, and beams will be located in the MSF staging area; delivery to the construction area may require street closures.
  - Completion of the electrical equipment in the PDS substation buildings.
  - Aerial construction of the guideway formwork with precast trapezoidal troughs and steel girders, and completion of platform, mezzanine, and vertical circulation elements for Pincay Station.
  - Aerial construction of the guideway formwork with precast trapezoidal troughs and steel girders, and completion of platform, mezzanine, and vertical circulation elements for the Prairie Avenue/Hardy Street Station.
  - Construction of the overhead bridge across Florence Avenue, providing a passenger access walkway from the Market Street/Florence Avenue Station to the Metro K Line Downtown Inglewood Station.

#### Phase 7

Phase 7 construction would include final site work and completion of the stations. Phase 7 would occur in 2026.

Phase 7 construction would include the following:

- Final site work and paving on Manchester Boulevard.
- Completion of the Prairie Avenue/Hardy Street Station.
- Completion of the Prairie Avenue/Manchester Boulevard Station.
- Completion of the Market Street/Florence Avenue Station.
- Final site work at the MSF site.
- Final site work at the Market Street/Florence Avenue Station.
- Construction of all surface parking lots.
- Final roadway improvements and modifications, and re-stripping of streets as required.

#### Phase 8

Phase 8 construction 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. Phase 8 construction would occur in 2025 through 2027, with the primary construction activities occurring in 2026 and some installation of equipment starting towards the end of Phase 3 construction when sufficient aerial structure is available for the installation of the equipment.

Phase 8 construction would include the following:

- Installation of the ATS track work.
- Installation, testing, and commissioning of the operation and control systems

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- Installation of the station platform equipment and systems, such as platform doors, passenger information systems, and ticket vending.
- Installation, testing, and commissioning of the PDS substation and power systems.
- Testing and commissioning of the ATS trains
- Station commissioning.
- This work will involve periodic temporary lane closures as 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.

The construction phases described above consist of tasks to occur in the pre-construction, surface construction, aerial construction, and light construction sequences of construction. These associated activities and tasks are described as follows.

#### Pre-Construction

Pre-construction activities would consist of assembling/drawing design packages; commencing off-site manufacturing; commencing acquisitions; relocating, modifying, or protecting in place utility lines, as needed; identifying traffic lights and signals to be relocated during construction, including preparing temporary signals and street lighting; commencing survey requirements; conducting confirmation geotechnical investigations focusing on geological, groundwater, seismic, and environmental conditions; developing a traffic control plan and determining detours and haul routes; erecting safety devices and noise barriers; identifying staging and employee parking areas for each construction phase; and mobilizing construction equipment within designated staging areas.

#### Surface Construction

The following surface construction activities will occur:

- Inspections to define demolition activities for existing building structures, facilities and utilities including open hardscapes and landscapes impacted by surface and aerial construction.
- Demolition of existing buildings where proposed.
- Removal of underground storage tanks associated with building demolition, and remediation of contaminated soil, if necessary.
- Separation of contaminated soils, if necessary, to be disposed of as soon as they are identified.
- Demolition of sidewalks and streets. Removal of existing asphalt surfaces, concrete sidewalks, and center medians.
- Clearing and grubbing including removal of landscaping as needed.
- Construction of foundations, cast-in-place (CIP) columns, and column caps for ATS guideway.
- Relocation and installation of streetlights and traffic signals.

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- Construction of site improvements for the MSF, PDS substations, and adjoining infrastructure.
- Construction of temporary or final concrete sidewalks, curbs, gutters, driveways, roadway improvements, striping, traffic and passenger signage, parking meters, hardscape, and landscape.

#### **Aerial Construction**

Aerial construction activities would include:

- Construction of columns and straddle bents for ATS guideway.
- Construction of aerial ATS guideway. It is assumed that the aerial segments would be constructed as precast trapezoidal troughs and/or using precast prestressed concrete “I” girder placed on CIP concrete columns, with post-tensioning strands for the guideway.
- The aerial ATS guideway would be lifted and connected into place atop the cast-in-place pile cap columns, and the top deck would be formed and poured.
- Construction of columns, straddle bents and support structures for the above-grade stations.
- Construction of the above-grade stations. The stations consist of three levels, with ground access leading to a mezzanine level and a platform level. The station would consist of structural concrete slabs with edge girders and post-tension concrete, a roof structure, and vertical circulation.

#### **Light Construction**

Light construction activities would consist of:

- Interior and exterior finishes for the MSF building.
- Interior and exterior finishes for the stations.
- ATS systems installation and testing, such as train control systems, communication systems, and electrical and mechanical systems.
- Minor roadway improvements.

#### **Construction Hours**

Construction activity would occur 24-hours a day seven days a week with primarily 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 AM to 3:00 PM and an evening shift from approx. 3:00 PM to 11:00 PM, or a morning shift from approximately 7:00 AM to 3:00 PM and a night shift from approximately 11:00 PM to 7:00 AM. 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, primarily 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,

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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,<sup>7</sup> any construction between the hours of 8:00 PM and 7:00 AM will require the approval of a permit from the Permits and License Committee of the City.

#### **3.7.3 Construction Equipment**

##### **Off-Road On-Site Equipment**

Off-road construction equipment would include impact pile drivers, auger drill rigs, 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**

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-road vehicles licensed to travel on public roadways.

##### **On-Road Off-Site Equipment**

On-road off-site vehicles would include personal vehicles for construction employees to come and go to work, and delivery vehicles for materials and equipment.

#### **3.7.4 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 approximate workforce would be 50 to 100 for Phase 1, 100 to 140 for Phase 2, 165 to 200 for Phase 3, 210 to 240 for Phase 4, 210 to 240 for Phase 5, 165 to 200 for Phase 6, 90 to 125 for Phase 7, and 50 to 100 for Phase 8.

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<sup>7</sup> City, Municipal Code, Section 5-41, Construction of Building and Projects Noise Regulated.

### 3.7.5 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. Proposed staging areas are shown in **Figure 3.0-35: Proposed Construction Staging Areas and Haul Routes**. The potential staging areas include the sites for all three stations, the MSF site, and the properties at 150 S. Market Street, 401 S. Prairie Avenue, and 1035 S. Prairie Avenue proposed for acquisition as part of the Project. Further, City-owned lots near the northeast corner of the Market Street and Manchester Boulevard, and others near the proposed Project could be used for construction employee parking.

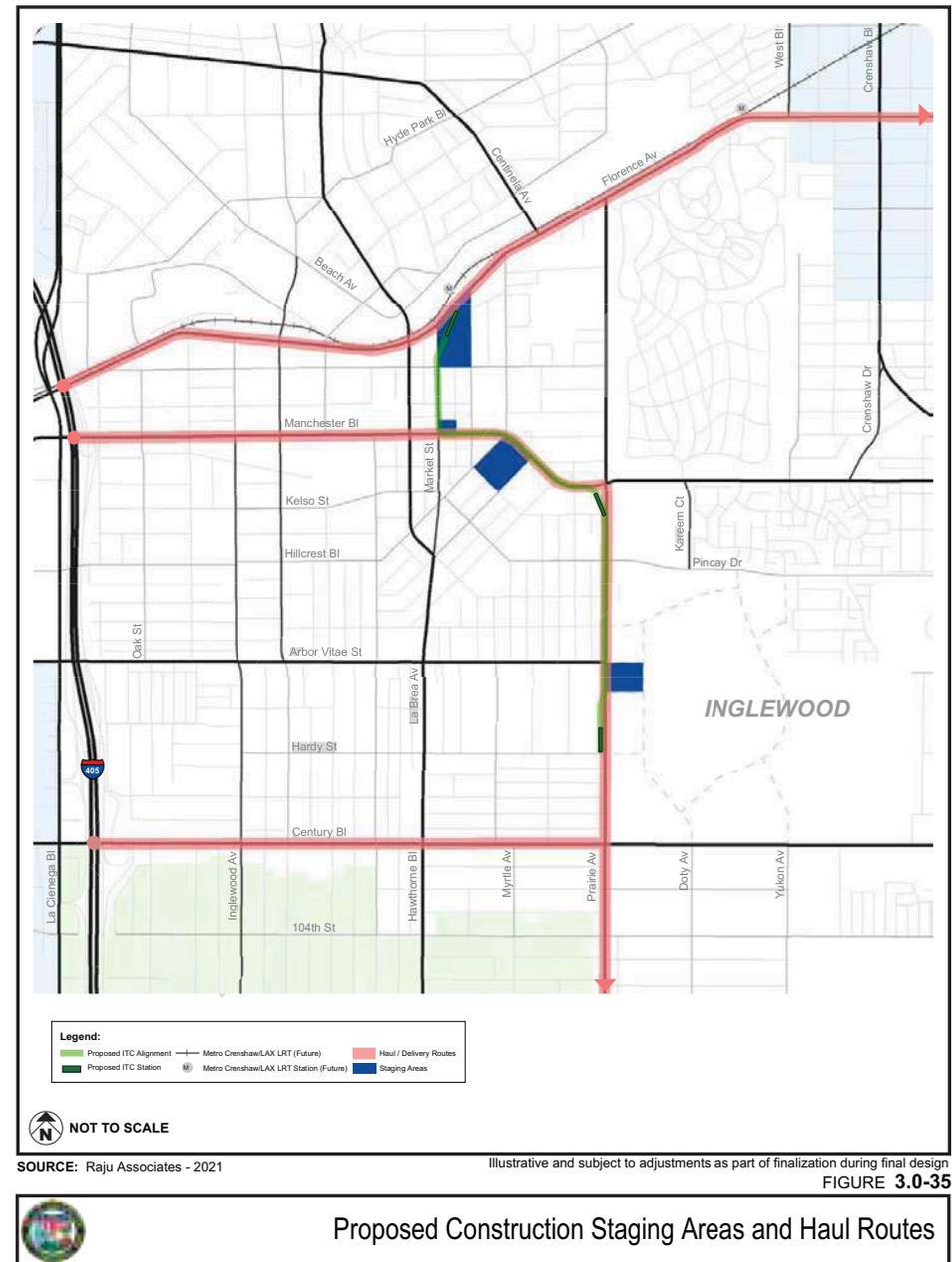
For the MSF site, a portion of the site outside the active construction footprints of the MSF and PDS substation would be used for minor construction staging, such as materials storage. Most of the site is proposed to be occupied by the reconstructed Vons supermarket and associated parking. Additionally, 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 1 mile of the proposed Project as needed.

### 3.7.6 Haul Routes

Designated delivery and haul routes would be established for the proposed Project consistent with the City's General Plan roadway designations and the haul routes currently used for local projects. As noted above, all haul routes would be reviewed and approved by the City as part of the Construction Commitment Program (see **Appendix D**). As shown in **Figure 3.0-35**, the primary delivery and haul routes proposed during construction of the proposed Project would utilize Florence Avenue, Manchester Boulevard, Prairie Avenue, and Century Boulevard, which have been designated by the City as appropriate for heavy truck use.<sup>8</sup> For materials delivered to and stored at designated construction staging areas, the contractor haul routes to and from the proposed Project would be generally on public streets. These routes would convey materials to and from regional routes, including the I-405 (Glen Anderson Freeway) and I-405 (San Diego Freeway).

<sup>8</sup> City of Inglewood Municipal Code, Section 3-95, Truck Routes Established. [https://www.qcode.us/codes/inglewood/view.php?topic=3-3-3\\_85&frames=0](https://www.qcode.us/codes/inglewood/view.php?topic=3-3-3_85&frames=0).



### 3.0 Project Description

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. An excavation plan would be prepared that defines haul routes, dust control, sweeping, and the location(s) for final disposal.

## 3.8 APPROVALS

The proposed Project includes an amendment to the City's General Plan and an amendment to Chapter 12, Planning and Zoning, of the Inglewood Municipal Code (IMC) to create an overlay zone to allow the construction and operation of the proposed Project. In addition, amendments to the City's Medical Enterprise Overlay Zone and the HPSP are proposed. The proposed Project would also include approvals related to the demolition and reconstruction of the Vons market, the reconfiguration of existing parcels through the approval of lot line adjustments, parcel maps, or tract maps and various other approvals as described below.

### 3.8.1 General Plan Amendment

The City's General Plan consists of the elements required by State law, including the Land Use, Circulation, Safety, Noise, Housing, Open Space, and Conservation Elements. The City adopted an Environmental Justice Element of the General Plan in June 2020.<sup>9</sup> The proposed Project would include amendments to the Land Use, Circulation, and Safety Elements as described below.

#### Land Use Element

The City's General Plan Land Use Element, inclusive of amendments through 2020, addresses key issues involving the use of land in the City; provides a framework of goals and objectives for decision makers as they consider the long-term commitment of land resources; and analyzes population and land use requirements into the future.<sup>10</sup>

The amendment to the General Plan Land Use Element would include changes to the text and diagrams related to the three components as described below.

First, the Goals and Objectives section would be modified to incorporate the ITC Project into the subsections addressing Circulation and the Downtown Transit Oriented District. The modified objectives address integration of the ATS system into the existing historic core area around Market Street,

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<sup>9</sup> City of Inglewood, General Plan, Environmental Justice Element, Adopted June 2020.

<sup>10</sup> City of Inglewood, *General Plan*, "Land Use Element" (adopted 1980, amended 1986, 2009, and 2016), accessed March 2019, <https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-PDF>

### 3.0 Project Description

connecting the Downtown Inglewood Metro Rail station to the LASED including SoFi Stadium, the Forum, and the IBEC with the ITC Project, and supporting the City's goal to promote adequate public transportation within the City and the region by adding the ITC Project.

Second, a description of the proposed ITC Project would be added to the "Passenger Train Service" subsection under the "Development Factors-Transportation Network" section. The subsection provides a list of passenger train services available in the City of Inglewood.

Third, the "Downtown Transit Oriented District" subsection in the "Future Land Uses" chapter would be amended to identify the proposed Transportation Corridor Overlay Zone (TC Overlay Zone) as one of the overlay zones in Downtown Inglewood. The TC Overlay Zone would supersede all other zones and overlay zones in the Project area, including the concept plans and zoning and design guidelines outlined by the Downtown Inglewood and Fairview Heights TOD Plan.

#### Circulation Element

The amendment to the General Plan Circulation Element<sup>11</sup> would include changes to text and diagrams related to the five components described below.

First, Market Street, between Florence Avenue to the north and La Brea Avenue to the south currently has two lanes of traffic in each direction with a center turn lane. With the Project, the configuration of Market Street will be changed to have one lane of traffic in each direction between Regent Street and Manchester Boulevard with a center island. The Circulation Element currently classifies Market Street as a Minor Arterial street. Minor Arterial streets contain two lanes of traffic in each direction.; this section of Market Street will be reclassified as a Collector street; Collector streets have one lane of traffic in each direction.

Second, the Circulation Element identifies typical street sections for common right-of-way widths and sections of streets planned for widening. The second component of the proposed amendment includes defining the maximum right of way for Prairie Avenue, between Manchester Boulevard to the north and Hardy Street to the south, as 132 feet.

Third, a description of the proposed Project, including its connection to the Metro K Line, would be added to the description of light rail facilities in the City.

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<sup>11</sup> City of Inglewood, *General Plan*, "Circulation Element" (1992), accessed March 2019, <https://www.cityofinglewood.org/DocumentCenter/View/128/Circulation-Element-1992-PDF>.

Fourth, changes to the descriptions of the street environment, parkways, medians, and on-street parking on Market Street, Manchester Boulevard, and Prairie Avenue that would be affected by the Project would be made.

Fifth, because insufficient right-of-way is available on Prairie Avenue between Manchester Boulevard and Century Boulevard to accommodate a bicycle lane, modification of the Bike Route Plan is proposed to preserve multimodal transportation options and connections for residents and employees along this section of Prairie Avenue.

### Safety Element

The Safety Element<sup>12</sup> would be amended to include descriptions of the proposed Project components including the guideway, stations MSF and PDS substations. Specifically, the proposed Project will be added to the element as a Critical Facility. The description of transportation routes would be updated to incorporate the presence of proposed Project components along its alignment.

### 3.8.2 Municipal Code Amendment

An amendment to Chapter 12, Planning and Zoning, of the IMC is proposed to create a Transportation Corridor Overlay Zone (TC Overlay Zone) that would apply to the proposed Project areas. A Zone Change and a Zoning Code Amendment are both required to establish the TC Overlay Zone. The TC Overlay Zone would modify the underlying zones to allow the development and operation of the proposed Project and all components on the properties in the underlying zones that overlap with the Project. The TC Overlay Zone would define the uses permitted in this overlay zone area and applicable supplemental development standards for the ITC facilities, and the City's design review process for the ITC Project.

The permitted uses for the TC Overlay Zone would be modeled upon, and expand on, the City's existing Transportation Corridor (T-C) Zone described in Section 12-38.5019F of the IMC, which provides the zoning framework for the Metro K Line within the City, with adjustments made to accommodate the elements necessary for an above-grade guideway, the MSF, the PDS substations, the multilevel stations, vertical circulation elements and connecting walkways and bridges, and all of the related supporting facilities and infrastructure. The proposed T-C-O Zone would allow the following as permitted uses (the TC Overlay Zone Uses):

<sup>12</sup> City of Inglewood, *General Plan*, "Circulation Element" (1992), accessed March 2019, <https://www.cityofinglewood.org/DocumentCenter/View/128/Circulation-Element-1992-PDF>.

1. The construction, operation and maintenance of any at-grade or elevated fixed guideway transportation system, including, without limitation, light rail (which may consist of an automated people mover system, automated guideway transit, monorail, and/or any other comparable system that may be steel-wheel/steel rail, rubber tired or magnetically levitated, supported on rail(s) from below, straddling, or suspended from overhead beam(s) from above), trolley, busway (including rapid transit), and/or comparable transit or transportation system, including public and private rights-of-way, easements, underground utilities, tracks, spurs, guideways, footings, support columns, support beams, and any appurtenant facilities, improvements, and equipment, including stations (which may be at-grade or elevated and comprise of one or multiple levels), maintenance facilities, storage facilities, operations control centers, related administrative and office facilities, restrooms, vertical and horizontal circulation elements (such as stairs, escalators, elevators, and passenger walkways), plazas or similar open space areas, platforms, signals, utility and storage areas, power distribution elements, electrical or traction power substations, rolling stock, and the like, that are necessary and related to the operation, maintenance and security of the transportation system.
2. Parking facilities (surface, subsurface, or structured) for transportation facilities (including such facilities' employees and users) or for use by adjacent businesses or public facilities.
3. Mobility hubs (which may be co-located with parking facilities) and multimodal pick-up and drop-off facilities.
4. In conjunction with the uses permitted in subsections (1) - (3) of this Section, property in the TC Overlay Zone may be landscaped and otherwise improved with ornamental fencing, ornamental lighting, directional and informational signage, public information and communications signage systems and all related facilities, fiber optics, emergency lighting, security systems, rest areas and seating, café or food service carts, service kiosks or structures, retail, and other similar streetscape improvements, public amenities or other uses typically found in public transit stations.
5. Station sites and maintenance or storage facility sites in the TC Overlay Zone may be jointly developed with station facilities and commercial, residential, public facility, or mixed uses.
6. As interim uses only during periods of construction, construction staging and laydown (including storage of all equipment and materials), fencing, construction-related office, and employee space (which may include restrooms and a canteen and/or food vendor area), interim parking, and ancillary temporary structures and any other temporary use approved by the Director of Public Works as reasonably related to any of the foregoing temporary or permanent uses or otherwise in the public interest.

### 3.0 Project Description

The TC Overlay Zone would also define development standards applicable to these permitted uses including the following:

- A height limit of 110 feet for station sites, 75 feet for the MSF site, and 75 feet for all other improvements, structures, and elements of the proposed Project, which include the guideway. These are height limits calculated above finished grade.
- No minimum setbacks (0' setback).
- No minimum street frontage requirements.
- Parking and public art requirements as specified in the Design Guidelines.

Additionally, development of the TC Overlay Zone Uses within the TC Overlay Zone will be subject to the Design Guidelines.

The TC Overlay Zone would specify that where the zone is overlaid on a private property, or portions thereof, any such area previously used to satisfy a minimum setback requirement in the underlying zone will still continue to be treated as a legal setback area and shall continue to be counted within any density or Floor Area Ratio calculations under the underlying zone for existing and future development purposes, regardless of whether such area is developed with the TC Overlay Zone Uses or ultimately dedicated as a public right-of-way.

The TC Overlay Zone boundaries would include the following:

- All parcels on which property rights are anticipated to be acquired to site Project infrastructure components, plus
- Along the portion of Prairie Avenue where roadway realignment is occurring, the additional width of Prairie Avenue plus an additional 30' of depth into the parcels directly east of those portions of Prairie Avenue, plus
- To the extent not covered by the above, an additional buffer of 30' around the anticipated envelope of Project infrastructure components

#### 3.8.3 Medical Enterprise Overlay Zone

The Medical Enterprise Overlay Zone applies to R-M (Residential) and C-2 (General Commercial) zoned properties located in the following Planning Areas:

- Planning Area One: Properties that are zoned R-M and located to the north of Manchester Boulevard and those C-2 zoned properties adjacent to the west side of Prairie Avenue that are located between Florence Avenue to the north and Manchester Terrace to the south.

### 3.0 Project Description

- Planning Area Two: Properties that are zoned R-M and located to the south of Manchester Boulevard and those C-2 zoned properties adjacent to the west side of Prairie Avenue that are located between Manchester Boulevard to the north and Hardy Street to the south.

The Medical Enterprise Overlay Zone currently applies to the following properties where the following Project Elements are proposed

- Prairie Avenue/Manchester Boulevard Station
- Prairie Avenue/Hardy Street Station
- Project elements proposed on the west side of Prairie not located within the public right-of-way

As part of the ITC Project, the City will amend the Medical Enterprise Overlay Zone in Chapter 12, Planning and Zoning, Article 5.1. "R-M" Residential and Medical Zone Regulations of the IMC [IMC §12-22.29] to exclude properties within the Project alignment from the Medical Enterprise Overlay Zone is proposed. The TC Overlay Zone would apply to these properties.

#### 3.8.4 Hollywood Park Specific Plan Amendment

To accommodate the ATS and to maintain the existing roadway capacity along Prairie Avenue, the ITC Project includes a relocation of an existing traffic lane on the east side of Prairie Avenue. The relocated lane would be accommodated within a variable easement for street purposes, to be acquired by the City over private property that currently comprises the existing required 30-foot setback area along the west edge of the HPSP area. While existing sidewalk widths along Prairie Avenue would be maintained, landscaping, signs and other streetscape improvements would be reduced or eliminated in certain areas following the property acquisition. To address any potential conflict or inconsistency with the HPSP, the City is proposing the following specific plan amendments and clarifications to the HPSP (which in accordance with the requirements of the Hollywood Park Development Agreement, require the concurrence of the property owner):

- The elimination of the requirement for a 30-foot setback along the western edge of the HPSP to allow zero-lot line development. Accordingly, future buildings and structures within the HPSP would be permitted to be built along the existing property line without requiring any additional setback along Prairie Avenue. Subterranean parking and certain structures, such as balconies, would be allowed to encroach within City's easement areas, to minimize the loss of the setback area on future development. Consistent with the proposed TC Overlay Zone, any area previously used to satisfy the minimum setback requirement shall continue to be counted within any density or Floor Area Ratio calculations under the Specific Plan, for existing and future development purposes, even though it may have been dedicated as a public right-of-way.

### 3.0 Project Description

- The landscape area within the 30-foot setback area on Prairie Avenue along the western edge of the HPSP area will be reduced or eliminated in certain areas, as needed to accommodate the new street easement.
- New areas where signs will be allowed will be proposed to support the replacement and relocation of existing monument and wayfinding signs currently located within the existing 30-foot setback area on Prairie Avenue along the western edge of the HPSP.
- Lastly, to support the attractiveness of the ITC Project and increase the transit mode share to the HPSP area, the City proposes to improve public safety, enhance the passenger circulation system and passenger experience to the event and activity centers at Hollywood Park by allowing for routine closures of 2 interior streets on event days to reduce passenger conflicts with vehicles within designated areas. Accordingly, to facilitate passenger only pathways on event days, the City proposes to amend the HPSP to designate Champions Way and Touchdown Drive as private streets and no longer require their public dedication (excluding subsurface, wet, dry and fiber utilities) to the City.

#### 3.8.5 500 and 510 East Manchester Boulevard

The MSF will be located on a parcel containing an existing retail commercial building at 500 E. Manchester Boulevard and 510 E. Manchester, which includes a Vons supermarket store at 500 E. Manchester Boulevard and Vons's gas station at 510 E. Manchester Boulevard. This parcel is currently designated as Historic Core (HC) and is proposed to be included as part of the TC Overlay. As part of the ITC Project, the gas station is anticipated to be demolished and a new supermarket is proposed to be constructed at the site. A City Planning Commission approval of Design Review for new supermarket store (TOD Plan §4.5 and Site Plan Review approval by the Planning and Building Department Director is required for the new grocery store (IMC § 12.39-50 et seq.). Other discretionary permits and approvals may be necessary to support the construction and operation of a new supermarket store and/or the removal of the current gas station. During construction, the City would permit the existing and new grocery store to operate with less than the amount of parking required by the City's municipal code. In addition, any current legal non-conforming uses associated with the existing grocery store, including, but not limited to, alcohol sales would be permitted to continue as legal non-conforming uses.

#### 3.8.6 Subdivision Actions, including Lot Line Adjustments, Parcel Maps, and Tract Maps

The proposed Project would require changes to the configuration and use of existing parcels owned by the City or proposed to be acquired by the City where construction of the proposed Project is proposed. Reconfiguration of existing parcels will occur as necessary either through lot line adjustments or through review and approval of a parcel or tract map.

### 3.0 Project Description

## 3.9 REQUIRED APPROVALS AND ACTIONS

The proposed Project would require a number of actions and reviews by the City, acting as Lead Agency, and other local, regional, and state agencies acting as Responsible Agencies as described below.

### 3.9.1 Lead Agency—City of Inglewood

Pursuant to Section 15051 of the State CEQA Guidelines, the City is acting as Lead Agency for the environmental review of the proposed Project. As such, it has responsibility for the approval of the Project and a number of other related actions:

- Certification of the Final EIR for the Inglewood Transit Connector Project and adoption of the Mitigation Monitoring and Reporting Plan, CEQA Findings of Fact, and, if necessary, a Statement of Overriding Considerations;
- Approval of the proposed General Plan Amendment, consisting of changes to the City General Plan Land Use Element, Circulation Element, and Safety Element;
- Approval of an amendment to Chapter 12 (Planning and Zoning) of the Inglewood Municipal Code to:
  - Add the Transportation Corridor Overlay (T-C-O) Zone; and
  - Amend the Medical Enterprise Overlay Zone to exclude properties within the Project alignment.
- Approval of amendments to the Forum Development Agreement to reflect the acquisition of frontage along Prairie (including loss of Forum parking);
- Approval of a Special Use Permit required for demolition of a gas station, Design Review for the new supermarket, and any other discretionary approval required for a new supermarket at 500 and 510 East Manchester Boulevard;
- Approval of amendments and clarifications to the Hollywood Park Specific Plan and associated Development Agreement;
- Preparation of a Project-specific Stormwater Management Plan or Standard Urban Stormwater Mitigation Plan for approval;
- Approvals of lot line adjustment(s), parcel map(s), and tract map(s) as needed;
- Approval of agreements and/or resolutions necessary to acquire the property necessary for construction and operation of the Project, in fee simple or through easements, licenses, air rights, leases, or other means of access, including through eminent domain;
- Approval of the ITC Design Guidelines;
- Approval of a contract or contracts for the design, finance, construction, and operation of the proposed Project;
- Approvals for federal, State, or local financing plans or grants.

### 3.0 Project Description

In addition to the above, ministerial approvals may be required as follows:

- Grading permits, building permits, haul route approval, and other permits issued by the Department of Building and Safety for the Project and any associated Department of Public Works permits (including encroachment permits) for infrastructure improvements;
- Tree removal permits; and
- Noise permit for Construction and Building Hours extension.
- Other federal, State, or local approvals, permits, or actions that may be deemed necessary for the Project including, but not limited to, the following:
  - California Public Utilities Commission;
  - Los Angeles County Fire Department.

#### 3.9.2 Responsible Agencies

The following State, regional, and other agencies have jurisdiction or review authority over components included in the proposed Project:

- South Coast Air Quality Management District (SCAQMD) would review permits for equipment regulated by SCAQMD;
- County of Los Angeles (as the City's contractor) Fire Department approval;
- Permits or approvals required from the Los Angeles Regional Water Quality Control Board (LARWQCB), which may include, but are not limited to: (1) General Construction Stormwater Permit; (2) Standard Urban Stormwater Mitigation Plan; (3) Industrial Stormwater General permit; and (4) Submittal of a Recycled Water Report to the LARWQCB for the use of recycled water as a dust control measure for construction;
- The Los Angeles County Sanitation District has authority for a Sewer Main Re-Alignment Permit, if applicable;
- The Los Angeles County Flood Control District has authority for a Storm Drain Realignment/Connection Permit, if applicable;
- California State Transportation Agency (CalSTA) for oversight and compliance for the Transit and Intercity Rail Capital Program (TIRCP) grant; and
- The Southern California Edison Company for any changes to the electrical distribution and service system.

## 4.0 ENVIRONMENTAL IMPACT ANALYSIS

### 4.0.1 INTRODUCTION

This Recirculated Draft EIR evaluates the physical environmental effects that would potentially occur from implementation of the proposed Project. The structure of the technical sections included in this section is discussed below, and definitions of key terms that are used throughout this Recirculated Draft EIR are provided. In addition, this section includes a description of certain possible environmental impacts that are typically considered under CEQA but are not analyzed in detail in this Recirculated Draft EIR because it was determined the proposed Project would have no impact. This section also provides a discussion of the Adjusted Baseline Environmental Setting and the identification of other past, present, or reasonably foreseeable projects that are used in the analysis of cumulative impacts throughout this chapter.

### 4.0.2 DEFINITIONS OF TERMS USED IN THE EIR

This Recirculated Draft EIR uses a number of terms that have specific meaning under CEQA. Among the most important of the terms used in the Recirculated Draft EIR are those that refer to the significance of environmental impacts. The following terms describe environmental effects of the proposed Project:

#### Significance Criteria

A set of criteria used by the lead agency (City of Inglewood) to determine at what level or threshold an impact would be considered significant. Thresholds of significance are identifiable quantitative, qualitative, or performance levels of a particular environmental effect that are supported by substantial evidence.<sup>1</sup> Thresholds of significance used in this Recirculated Draft EIR include those standards provided by the City, unless otherwise specifically defined.

- **No Impact:** No impact means that the proposed Project would result in no direct or indirect adverse changes (or impacts) to the environment, with respect to the applicable significance criterion. A project impact with a no impact determination would also not contribute to a cumulative impact. Where the proposed Project would not have an impact, the impact statement states this definitively.
- **Less-than-Significant Impact:** A project impact is considered less than significant when the physical change caused by the proposed Project would not exceed the applicable significance criterion.
- **Potentially Significant Impact:** A potentially significant impact is identified where the proposed Project may cause a substantial adverse change in the environment, depending on certain unknown conditions related to the proposed Project or the affected environment. For CEQA purposes, a potentially significant impact is treated as if it were a significant impact. A project impact is considered potentially significant if the proposed Project is anticipated to exceed identified standards of

<sup>1</sup> CEQA Guidelines section 15064.7.

significance thereby result in a substantial adverse change in the physical conditions of the environment. Significant impacts are identified by the evaluation of project-related physical change compared to specified significance criteria.

- A **Significant Impact** is defined as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.”<sup>2</sup> In instances where potentially significant impacts are identified, the EIR must consider whether mitigation measures (as defined below) or alternatives to the proposed Project would reduce those impacts.
- **Significant and Unavoidable Impact:** A project impact is considered significant and unavoidable if it would result in a substantial adverse physical change in the environment that cannot be feasibly mitigated to a less-than-significant level.
- **Cumulative Impact:** Under CEQA, a cumulative impact refers to “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.”<sup>3</sup> “[A] cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts.”<sup>4</sup> A project has “cumulatively considerable” environmental effects (i.e., is significant) when “the incremental effects of [the] project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.”<sup>5</sup>

### Mitigation Measures

Where a potentially significant impact or significant and unavoidable impact is identified, feasible mitigation measures that could minimize the identified significant adverse impact are required.<sup>6</sup> A mitigation measure is an action that could be taken that would avoid or reduce the magnitude of a significant impact. CEQA Guidelines section 15370 defines mitigation as:

- Avoiding the impact altogether by not taking a certain action or parts of an action;
- Minimizing impacts by limiting the degree of magnitude of the action and its implementation;
- Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment;
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and
- Compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements.

<sup>2</sup> 2020 California Environmental Quality Act (CEQA) Statute and Guidelines (CEQA Guidelines) section 15382.

<sup>3</sup> CEQA Guidelines section 15355.

<sup>4</sup> CEQA Guidelines section 15130, subd. (a)(1).

<sup>5</sup> CEQA Guidelines sections 15065, subd. (a)(3), 15130, subd. (a), 15064, subd. (h)(1).

<sup>6</sup> CEQA Guidelines section 15126.4.

### 4.0.3 SECTION FORMAT

This section is divided into technical sections (e.g., **Section 4.1: Aesthetics**) that present for each environmental resource topic area the regulatory setting, the physical environmental setting, standards of significance from which impacts are measured, analytical methods, an evaluation of potential impacts to the environment, and, where required, potentially feasible mitigation measures for identified significant impacts. Each section includes an analysis of project-specific and cumulative impacts for each topic area.

The following topic areas are addressed in this section:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise and Vibration
- Population, Employment, and Housing
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems

The topical environmental sections each begin with a description of the proposed Project’s **regulatory setting** and the **environmental setting** (existing conditions) as it pertains to a particular topic. The environmental setting provides a point of reference for assessing the environmental impacts of the proposed Project.

- The regulatory setting presents relevant information about federal, State, regional, and/or local laws, regulations, plans or policies that pertain to the environmental resources addressed in each section.
- The environmental setting describes existing conditions at the time the NOP was circulated for the proposed Project (July 2018). An **adjusted baseline** is considered in this Recirculated Draft EIR (see discussion below in *Section 4.0.4*) to account for nearby development in the Los Angeles Sports and Entertainment District (LAESD), Hollywood Park Specific Plan (HPSP).
- Each technical environmental section includes a discussion of whether there are any inconsistencies between the proposed Project and applicable general plans, specific plans, and regional plans.

Next, each section presents **significance criteria**, which identify the standards used by the City to determine the significance of effects of the proposed Project. CEQA Guidelines state that “a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or

recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.”<sup>7</sup>

A **methodology** and **assumptions** description in each section presents the analytical methods and key assumptions used in the evaluation of effects of the proposed Project and is followed by an **impacts** and **mitigation measures** discussion.

The impact and mitigation portion of each section includes one or more impact statements. Any Project Design Features relevant to the topic being analyzed are identified. An explanation of each impact is followed by an analysis of its significance. The impact discussion ends with a concluding statement regarding the significance of the impact. Direct, indirect, short-term, long-term, on-site, and/or off-site impacts are addressed, as appropriate, for the environmental topic area being analyzed. Depending on the significance criteria, the impact analysis may consist of a qualitative discussion, a quantitative analysis, or a combination of both. Detailed technical appendices are also provided for several technical sections, where appropriate, and can be located at the end of the document.

Mitigation measures pertinent to each individual impact, if necessary, appear after the impact discussion section. The magnitude of reduction of an impact and the potential effect of that reduction in magnitude on the significance of the impact is also disclosed. Potential **mitigation measures** for potentially significant impacts are identified as appropriate. The description of mitigation measures concludes with the **level of the significance** of the impact after application of the mitigation measure(s): either implementation of the mitigation measure(s) would reduce the impact to a less-than-significant level, or the impact would remain significant and unavoidable after implementation of all potentially feasible mitigation measures.

An example of the format of each of the is shown below.

#### **Impact 4.X-1: Impact statement (significance conclusion)**

##### **Construction and/or Operation**

In the impact statement, terminology is used to indicate the level of significance of the impact. If an impact is less than significant, then the impact statement would say that the proposed Project “could” affect a resource. If an impact is potentially significant or

<sup>7</sup> CEQA Guidelines section 15064.7, subd. (c).

significant and unavoidable, then the impact statement would say that the proposed Project “would” affect a resource.

A discussion of the proposed Project’s impact is provided in paragraph form. A statement level of significance before application of any mitigation measures is provided.

#### **Mitigation Measures**

**MM XX-X** Mitigation measure presented in bolding and numbered to match the impact number.

#### **Level of Significance After Mitigation**

This paragraph describes how the mitigation measure(s) reduces the impact and identifies the residual level of impact.

#### **Cumulative Impacts**

A cumulative impact analysis is provided for each section. As previously noted, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. The proposed Project’s impacts are evaluated against other related projects that are within the same geographic area that is applicable to the topic (i.e., water service area, air basin, etc.). A project has a “cumulatively considerable” environmental effect (i.e., a significant impact) when “the incremental effects of [the] project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.”

#### **4.0.4 ADJUSTED BASELINE**

The CEQA Guidelines provides that an EIR must include a description of the physical environmental conditions in the project vicinity.<sup>8</sup> It also allows for a lead agency to define existing conditions by conditions expected when the proposed Project becomes operational, when supported by substantial evidence.

#### **Development Projects**

The proposed Project is not expected to be complete and operational until 2027. At this time, the City has approved construction plans or issued building permits for, and construction has commenced on, significant portions of the LASED and HPSP located immediately east of the proposed Project and stations on Prairie Avenue.

These projects provide for substantial development that would occur since the release of the NOP and

<sup>8</sup> CEQA Guidelines section 15125, subd. (a).

prior to the start of construction and operation of the proposed Project. As such, the conditions of the existing baseline would be different from when the NOP was released.

Construction and operation of the Adjusted Baseline projects would change the physical conditions that currently exist in the vicinity of the proposed Project for most of the environmental topics addressed in this EIR. Due to the reasonable certainty that the Adjusted Baseline projects would be constructed and in operation prior to construction and operation of the proposed Project, the City has determined that assuming the Adjusted Baseline projects in the baseline provides the most accurate picture of the proposed Project's impacts and that it would be misleading to disregard the Adjusted Baseline projects in the establishing the baseline.

Accordingly, the changes associated with Adjusted Baseline projects are considered as part of the Adjusted Baseline Environmental Setting, which is the baseline against which the proposed Project's potential impacts are measured. How these changes affect the environmental setting is further described in each topical section under the heading Adjusted Baseline Environmental Setting.

The Adjusted Baseline projects are listed in **Table 4.0-1: Adjusted Baseline Projects**.

**Table 4.0-1  
Adjusted Baseline Projects**

Land Use	Adjusted Baseline Projects	Estimated Operational Date
<b>Hollywood Park Specific Plan (HPSP)</b>		
Retail	518,077 SF	September 2021
Office	466,000 SF	September 2021
Residential	314 units	May 2021
NFL Stadium	70,000 seats (2,772,304 SF)	Summer 2020 – Now Open
Perform. Venue	6,000 seats	Fall 2020
Open Space	11.89 acres	Fall 2020
Civic Use	4 acres	Fall 2020

## Roadways

A number of physical improvements are required as mitigations and/or conditions of approval of the Hollywood Park Specific Plan, are related to the City's ongoing Century Boulevard Improvement Plan or are associated with the Metro K Line project. These improvements either are under construction or are approved and funded and scheduled; the improvements would be in place under all adjusted baseline condition scenarios. The full list of improvements is described further in **Section 4.12: Transportation**.

## Transit

The Adjusted Baseline conditions transit network would differ considerably from existing conditions due to completion of Metro's K Line project prior to 2024. Ridership forecasts for a 2025 condition were used to represent the Adjusted Baseline condition.

Metro is also studying changes to its bus system through the NextGen Bus study, but future changes to bus service are not yet defined and so would be speculative to assume. Therefore, the Adjusted Baseline conditions analysis assumes the existing bus routes that serve the area would remain in operation at opening year of the proposed Project.

### 4.0.5 CUMULATIVE IMPACT METHODOLOGY

#### Cumulative Impacts

The CEQA Guidelines<sup>9</sup> require that an EIR discuss cumulative impacts of a project when a project's incremental effect is cumulatively considerable.<sup>10</sup> As defined in the CEQA Guidelines,<sup>11</sup> a cumulative impact consists of an impact that is created as a result of the combination of a project evaluated in the EIR together with other past, present, and reasonably foreseeable projects causing related impacts. CEQA Guidelines section 15130, subdivision (b) requires that the discussion of cumulative impacts shall "reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone."

In each topical section of the EIR, an analysis of cumulative impacts follows the project-specific impacts and mitigation measures evaluation. An introductory discussion that identifies the cumulative impact methodology and defines the cumulative context being addressed in each respective analysis (e.g., the South Coast Air Basin, or the City) is included at the beginning of the cumulative impact analysis in each technical section. In some instances, a project-specific impact may be considered less than significant, but its contribution to a larger impact may be determined to be potentially significant when considered in combination with other cumulative development of the surrounding area or in combination with regional growth projections.

<sup>9</sup> CEQA Guidelines section 15130.

<sup>10</sup> *Ibid.*

<sup>11</sup> CEQA Guidelines Section 15355.

### Cumulative Project List

The City has identified cumulative projects focused on those projects that were proposed as of August 2020. **Figure 4.0-1: Cumulative Projects Map** identifies the locations of these cumulative projects. **Table 4.0-2: Cumulative Projects List** provides a list of all past, present, and reasonably foreseeable projects.

To understand the proposed Project’s contribution to cumulative impacts, the City, in consultation with other surrounding jurisdictions, has assembled a list of other known past, present, and reasonably foreseeable cumulative projects in the vicinity of the proposed Project. Projects on this list consist of development projects within the City or other identified surrounding jurisdictions that have a pending development application, are approved, or are under construction, and transit and related infrastructure improvement projects that have been approved or proposed and under review.

#### 4.0.6 SENSITIVE RECEPTORS

Sensitive receptors include, but are not limited to, hospitals, schools, daycare facilities, elderly housing convalescent facilities, and temporary housing (hotels and motels). These are areas where the occupants are more susceptible to the adverse effects of adverse impacts, such as increased noise and exposure to toxic chemicals, pesticides, and other pollutants. Certain population groups, such as children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to the potential effects of air pollution than others.<sup>12</sup> As a result, certain land uses that are occupied by these population groups, such as residences, schools, playgrounds and childcare center, hospitals, rehabilitation centers, convalescent centers, and retirement homes are considered to be air quality sensitive land uses, i.e., air quality sensitive receptors. Sensitive receptors for noise include residences, schools, hospitals, libraries, and parks.

**Figure 4.0-2: Project Area Quarter Mile Buffer** identifies the area of quarter mile area used to identify the sensitive receptors. Within one quarter mile of the proposed Project including the guideway, stations, MSF, 61 sensitive receptors have been identified as shown in **Figure 4.0-3a-c: Map of Sensitive Receptors**. Sensitive receptors for noise are detailed further in **Section 4.10: Noise**.

12 South Coast Air Quality Management District, 1993. *CEQA Air Quality Handbook*. November 1993.

**Table 4.0-2  
Cumulative Projects List**

No.	Project	Address	Project Description
<b>City of Inglewood</b>			
1	Starbucks Drive-Thru Kiosk	1740 Centinela Avenue	Construct 900 SF Starbucks drive-thru kiosk
2	Commercial Building	721 N. La Brea Avenue	Demolish 1,210 SF and add 1,312 SF to an existing commercial building
3	Condominiums	329 E. Hazel Street	Development of 4-unit Condo with 10 parking spaces per SP-1229
4	Parking Lot Improvement	2616-2878 W. Imperial Highway	Renovation and adding 13,000 SF, facade and parking lot improvement of an existing shopping center
5	Condominiums	501 E. 99th Street	12 new condominiums
6	Apartments	704 N. Market Street	12 new residential apartment units
7	Senior Center	111 N. Locust Street	New Senior Center
8	Condominiums	664 E. Manchester Terrace	Four (4) new residential condominiums
9	Apartments	844 N. Centinela Avenue	Four (4) new residential apartment units
10	Apartments	125 E. Spruce Avenue	Seven (7) new apartment units with semi-subterranean parking
11	Manufacturing/Warehouse w/ Office	234 W. Hyde Park Boulevard	Construct new 140,185 SF manufacturing/warehouse building including 7,500 SF of office space
12	Parking Lot	279 W. Beach Avenue	Development of 190 parking spaces
13	Townhomes	573 1/2 E. Hyde Park Place	Construct three townhomes with 6 enclosed parking spaces
14	Senior Housing	508 S. Eucalyptus Avenue	40-unit senior affordable housing development
15	Residential Project	575 E. Hyde Park Boulevard	Three-unit two-story residential building
16	Office Project	401 W. Arbor Vitae Street	Addition of four new offices in office complex and one new bathroom, demolish existing bathroom and existing office space, and add 4 new parking spaces
17	Townhomes	333 N. Prairie Avenue	310 townhome units at the former Daniel Freeman site
18	Commercial Building	408 E. Warren Lane	New two-story 2,542 SF commercial building
19	Gas Station w/ Mini-Mart	8307 S. La Cienega Boulevard	Construct a new 3,636 SF structure (mini market and retail space) at an existing gas station operation
20	Mixed-Use Project	D3 SITE (La Brea Avenue/Florence Avenue)	243 units; 40,000 SF retail

No.	Project	Address	Project Description
21	Centinela Hospital	555 W. Hardy Street	<ol style="list-style-type: none"> <li>West Tower: Upgrades including the remodel of the main building entrance and the south elevation and seismic upgrades in compliance with SB 1953</li> <li>Electrical Upgrade: A campus-wide electrical upgrade that includes construction of a new 5,900 SF repair shop building and 4,200 SF electrical yard with three emergency generators and a 16,000 gallon underground fuel tank for 72 hour emergency power at the northeast corner of the campus on Flower Street</li> <li>Emergency Department: A new 2,400 SF addition and redesigned front entrance to the Emergency Department including new admitting, triage, and waiting areas, and expanding the capacity of the Emergency Department by eight beds (total of 52 beds)</li> <li>Loading and Delivery Areas: Other upgrades that includes the demolition of two building (totaling 6,200 SF), the partial demolition of a 4,670 SF building, addition, or rehabilitation of various buildings and relocation of the delivery and loading areas from the emergency room area to the rear of the campus</li> </ol>
22	Hollywood Park Project (note: this project is also part of the Adjusted Baseline)	1050 S. Prairie Avenue	70,240-seat sport stadium; 6,000-seat performance venue; 2,500 du residential; 890,000 SF retail; 780,000 SF office; 300-room hotel; 24.95 acres open space; 4 acres civic site
23	Apartments	417-433 Centinela Avenue	116-unit apartment
24	Residential	3660 W. 107th Street	New 3 du with 6 car garage
25	Congregate Care	614 E. Hyde Park Boulevard	18-bed congregate living facility
26	Apartments	921 N. Edgewood Street	38-unit apartment
27	Townhomes	113-133 Plymouth Street	20-unit townhome development
28	Condominiums	316 Hardy Street	5-unit condominium development
29	Self-Storage Project	705-715 N. Centinela Avenue	81,613 SF, approximately 400-unit, five-story self-storage
30	Retail	101,125,139,140,150 Market Street	40,000 SF retail and 150 parking spaces
31	Hotel Project	11111 S. Prairie Avenue	120-room hotel
32	Murphy Bowl Project (Clippers arena)	Yukon Avenue/Century Boulevard	18,500-seat venue with associated ancillary uses
33	Imperial/Crenshaw TOD	Imperial Highway/Crenshaw Boulevard	Transit oriented development plan
34	Westchester/Veterans TOD	Florence Avenue/Hindry Avenue	Transit oriented development plan

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No.	Project	Address	Project Description
35	Downtown (Florence/La Brea) TOD (note: although proposed Project includes development of a station at this site with additional surface parking; it does not preclude development of the site as noted in the Downtown TOD)	Florence Avenue/La Brea Avenue	Transit oriented development plan
36	Fairview Heights (Florence/West) TOD	Florence Avenue/West Boulevard	Transit oriented development plan
37	Hollywood Park Phase II	1050 S. Prairie Avenue	Approximately 5,250,000 SF of office
38	Condominium Development	961 E. 68th Street	3-unit detached condominium
39	Multifamily Development	411 E. Hazel Street	18-unit multifamily building
40	Multifamily Development	222 W. Spruce Avenue	10-unit multifamily building
41	Multifamily Development	819 E. La Palma Drive	5-unit multifamily building
42	Condominium Development	417 N. Market Street	Two 6-unit condominium buildings
43	Congregate Living Facility	814 N. Market Street	Construction of a new 12 unit, 5,163 SF congregate health, residential care facility
44	Los Angeles Philharmonic Association - Youth Orchestra Program (YOLA)	101 S. La Brea Avenue	Los Angeles Philharmonic Association - Youth Orchestra Program that would serve students 6 - 18 Yrs. Expand the existing structure to a venue that is approximately 25,500 SF. The venue would serve as the home for YOLA performances, special events showcasing guest artists and LA Phil's national education programs, and some other performances. There would be 350-500 students from Monday to Saturday and around 150 on Sundays
45	Apartment Building	3920 W. 108th Street	3-unit apartment building
46	Self-Storage Facility	943-959 W. Hyde Park Boulevard	Five-story self-storage facility (159,498 SF)
47	General Plan Amendment for Rental Car Facility	8911 Aviation Boulevard	General Plan Amendment for rental car facility (173,804 SF)
48	General Plan Amendment to Incorporate Environmental Justice Element	Citywide	General Plan Amendment to incorporate Environmental Justice Element
49	Hotel	3900 W. Century Boulevard	Hotel renovation 4 units
50	Senior Housing and Pre-school	3320 W. 85th Street	65 unit senior housing and a 4,313 SF pre-school to replace existing church, pre-school (serving 70 students)
51	Multifamily	332 Stepeny Street	8-unit multifamily building with 3 affordable housing units

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No.	Project	Address	Project Description
52	Mixed-Use	336 W. Hillcrest Boulevard	62 unit mixed use development
53	Self-Storage Facility	3700 102nd Street	Five-story 79,415 SF self-storage facility
54	Condominiums	423 E. Warren Lane	44 units condos with 5 V.L.I. units
55	Hotel	3820 W. 102nd Street	300 room, fourteen-story hotel with 349 parking spaces
56	Multifamily	715 N. Mariborough Avenue	Conversion of 3 offices into residential units with one affordable unit
57	Apartments	220 E. Hazel Street	7,161 SF, 4 unit apartment building with subterranean parking
58	Commercial Building	970 W. Manchester Boulevard	1,800 SF car/bus wash and above ground fueling station within a car rental site
59	Apartments	1013 E. La Palma Drive	Three-story apartment unit, three unit
60	Apartments	608 E. Queen Street	4-unit apartment building and parking
61	Commercial Building	455 N. Prairie Avenue	6,530 SF, two-story medical office building
62	Commercial Building	335 Glasgow Avenue	Auto rental facility
63	Apartments	1001 N. Welton Way	New 11-unit apartment building
64	Commercial Building	1031 Manchester Boulevard	Construct restaurant with outdoor dining for existing brewery
65	Multifamily	527 E. Hyde Park Boulevard	21-unit, four-story building with two affordable units
66	Fast Food Restaurant	230 W. Arbor Viae Street	Construction of a new 899 SF fast food restaurant building
67	Multifamily	716 W. Beach Avenue	42,745 SF, 42 unit multifamily apartment (41 affordable units)
68	Townhomes	627 W. Hill Street	8-unit new townhomes
69	Multifamily	3362 Imperial Highway	3-unit three-story triplex
70	Starbucks	4801 Century Boulevard	185 SF addition for drive-thru only Starbucks coffee shop
71	Hotel	4049 Century Boulevard	145-room hotel
72	Multifamily	334 Stepnay Street	4-unit condo subdivision
73	Mixed-Use Project	317 S. La Brea	311 units (32 affordable and 5 live-work units); 22,000 SF commercial/retail; 361 parking spaces
74	Multifamily	11227 S. Prairie Avenue	400 units
75	Centinela Grade Separation Project	Centinela Avenue/Florence Avenue Intersection	Conversion of at-grade Metro K Line crossing to above-grade crossing
<b>City of Los Angeles</b>			
76	Mixed-Use: Residential, Retail & Office	601 S. Ocean Front Walk	Mixed-use: SFDU (joint live/work), 5,254 SF retail and 22,738 SF office

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No.	Project	Address	Project Description
77	Marina Island Mixed-Use: Apartment & Office	5000 S. Beethoven Street	Mixed-Use: 156-unit apartment and 33,484 SF office
78	Office Project	12575 Beatrice Street	250,000 SF office. Existing 23,000 SF office to be removed
79	Mixed-Use: Apartment & Restaurant	3644 S. Overland Avenue	New mixed-use: 92-unit apartment and 1,573 SF restaurant use (110 spaces)
80	Bakery with Retail & Restaurant	320 E. Sunset Avenue	Change of use from 4,675 SF commercial office to 6,000 SF bakery/retail/restaurant (4,737 SF indoor and 1,263 SF indoor and outdoor seating area)
81	Mixed-Use: Condominium & Retail	4363 S. Lincoln Boulevard	Consultation; proposed ten-story, 80 condominium units and 15,100 SF supermarket
82	Hotel	9800 S. Sepulveda Boulevard	Change of use from 118,490 SF office (nine-story building) to 178-room hotel with restaurant and spa ("O" Hotel)
83	Sterling West School	5206 W. Thornburn Street	New 50-student private school (grades 3-12)
84	Ballona Wetlands Ecological Reserve Restoration Project	Ballona Wetlands	Restoration of wetlands/ecological reserve
85	Wrapper Office Building Project	5790 W. Jefferson Boulevard	Construct ten-story 150,761 SF office building
86	Playa Vista Phase I	Jefferson Boulevard b/t Lincoln Boulevard and Centinela Avenue	1. Include 3,246 du, 1,570,000 SF of office use, 25,000 SF of retail use and 65,000 SF of community serving use 2. West site include 400,000 SF office use, 705 du apartment, 80 du condominiums, 80 du senior apartments
87	The Village at Playa Vista (Phase II)	s/o Jefferson Boulevard/Westlawn Avenue	Include 2,600 du, 175,000 SF of office use, 150,000 SF of retail use, and 40,000 SF of community serving uses
88	Mixed-Use Apartment, Office, Retail, and Restaurant	10601 Washington Boulevard	126-unit apartment, 23 kSF office, 9 kSF retail, 9 kSF restaurant. Existing 10 kSF office to be removed
89	Mixed-Use Condominium and Retail	3115 S. Sepulveda Boulevard	(Preliminary) 175-unit condominium and 28 kSF retail. Existing 28 kSF discount store to be removed
90	Condominium	11131 Rose Avenue	227-unit condominium. Existing 89-unit apartment to be removed
91	Hotel & Restaurant Project	305 Ocean Front Walk	24-room hotel and 2 kSF high-turnover restaurant
92	Restaurant & Retail	10612 National Boulevard	1,726 SF coffee shop (Coffee Bean) including 250 SF outdoor seating on existing vacant lot
93	LADPW Maintenance Yard	3233 Thatcher Avenue	Improve/expansion of the existing LADPW maintenance yard plus addition of 30 new employees to site
94	Mixed-Use Apartment, Retail and Restaurant	6719 Pacific Avenue	Mixed-use 35-unit townhomes, 2 kSF specialty retail and 2 kSF restaurant uses

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No.	Project	Address	Project Description
95	Mixed-Use Condominium and Retail	138 Culver Boulevard	Mixed-use with 72-unit condominium, 13 kSF retail space and 1.5 kSF restaurant
96	LMU Master Plan	1 LMU Drive	Increase enrollment capacity to 7,800 students
97	Car Wash	9204 Airport Boulevard	15,380 SF car wash to replace existing car rental facility
98	Residential & Retail	580 Venice Boulevard	(Preliminary) 5-unit residential plus 5.7 kSF retail space
99	Restaurant	1020 W. Venice Boulevard	Proposed House of Pies sit-down restaurant land use (3,895 SF)
100	Mixed-Use: Apartment & Office	4140 S. Glencoe Avenue	New four-story, 67-unit apartment and 3,211 SF office building over 2-level parking garage
101	Mixed-Use: Apartment & Retail	7407 S. La Tijera Boulevard	New 140-unit apartment and 2,600 SF retail over 241-space parking garage
102	Mixed-Use: Hotel, Retail & Restaurant Uses	1027 S. Abbot Kinney Boulevard	New 92-room hotel, 3,000 SF retail and 2,072 SF restaurant parking garage
103	Apartment	4090 S. Del Rey Avenue	New four-story, 51-unit apartment building over 3-level parking garage
104	Mixed-Use: Condominium & Office	4210 S. Del Rey Avenue	Proposed 136 condominium Units and 20,000 SF commercial office
105	Fast Food Restaurant w/ Drive-Thru	8521 S. Sepulveda Boulevard	New 3,999 SF Chick-fil-A fast food with drive-thru restaurant
106	OTIS College of Arts & Design	9045 S. Lincoln Boulevard	Relocation and consolidation of existing OTIS College Campus students, faculty and staff, 91,000 SF development (94,000 SF student housing with 240 total beds and 37,000 SF campus uses)
107	Mixed-Use: Condominium & Office	4091 S. Redwood Avenue	67 condominium Units and 7,525 SF commercial office building providing 141 parking spaces
108	Apartments	3822 S. Dunn Drive	Seven-story, 86-unit apartment building over ground floor parking garage
109	Office	12777 W. Jefferson Boulevard	Commercial office expansion (49,950 SF)
110	Apartments	8740 S. La Tijera Boulevard	New 137-unit apartment building to replace existing 215-student Westchester Secondary Charter School
111	Jefferson & La Cienega Mixed-Use Development Project	3221 S. La Cienega Boulevard	Converting existing ABC Lot to a mixed-Use: 1,218-unit apartment, 200,000 SF office, 50,000 SF grocery store, 30,000 SF retail and 20,000 SF restaurant project
112	LAUSD Elementary School	2224 S. Walgrove Avenue	New 567-Student Elementary School (K-5) Immersive Mandarin Language program

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No.	Project	Address	Project Description
113	Mixed-Use: Apartment, Mini-Warehouse & Office	4040 S. Del Rey Avenue	New 195-unit apartment; 15,000 SF office and 80,000 SF mini-warehouse (option 1) or 235-unit apartment and 15,000 SF office (option 2 preferred)
114	Charter Middle School	8540 S. La Tijera Boulevard	Charter middle school for max enrollment of 525 students
115	Howard Hughes Center	6801 Center Drive	600-unit apartment and 488,659 SF remaining development potential
116	LAX Landside Access Modernization Program (LAMMP)	Los Angeles International Airport	Landside Access Modernization Program in Manchester Square
117	LAX Northside Project	Westchester Parkway b/t Pershing Drive and Sepulveda Boulevard	2.32 million SF of development including office, research and development, community/civic uses, recreation and open space
118	Mixed-Use: Apartment & Automotive Dealership	5747 S. Mesmer Avenue	New 400-unit apartment and 250,000 SF automotive dealership
119	Apartments	3739 S. Cardiff Avenue	New 74-unit building replaces existing 5 du
120	Manchester Urban Homes Project	8721 S. Broadway	62 SF affordable and 46 affordable family units and 4 kSF office
121	South LA Redevelopment 5B Office	1636 W. Manchester Avenue	68,250 SF office
122	South LA Redevelopment 6A	5975 S. Western Avenue	225,000 SF industrial
123	Shopping Center	8400 S. Vermont Avenue	180-du apartments, 50,000 SF retail, boarding school 20 faculty rooms and 200 dorm rooms
124	Bethany Square Mixed-Use	8415 S. Hoover Street	142-unit condominiums; 57-unit apartment; 11.55 kSF recreational center; 7.5 kSF retail; 1.5 kSF bank; 15.4 kSF office
125	Mixed-Use	9402 S. Broadway	49-unit senior housing, 25,000 SF
126	Convenience Store	7117 S. Vermont Avenue	3,000 SF retail
127	Charter Middle School	8705 S. Western Avenue	Middle school, 616 students
128	Gas Station	5816 S. Western Avenue	Fueling positions: 12; additional 4 fueling positions and 1,835 SF convenience store
129	Car Wash & Laundromat	6100 S. Hoover Street	6-stall car wash, 2,328 SF
130	Gas Station	10000 S. Vermont Avenue	Fueling positions: 8; and 2,830 SF convenience store
131	Gas Station w/ Convenience Store	505 W. Century Boulevard	Fueling positions: 6
132	Apartments	6733 Sepulveda Boulevard	176 Units
133	Teledyne Office Project	12964 W. Panama Street	159,000 SF office
134	Jandy Creative Office and Parking	5405 S. Jandy Place	93,950 SF office

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No.	Project	Address	Project Description
135	COU Warehouse to office	4721 S. Alla Road	118,352 gSF; COU warehouse (24,051 SF) to office with 7,926 SF office addition
136	Charter School	12870 W. Panama Street	Relocation of the Ocean Charter School; 532 students (K-8)
137	COU Office to Medical Office	12555 W. Jefferson Boulevard	20,981 gSF medical office
138	Office	11811 S. Teale Street	10,925 gSF; addition of two mezzanines 2,450 SF within an existing 8,475 SF building
139	Apartments	6711 S. Sepulveda Boulevard	180-unit apartment
140	New Smart & Final Supermarket	6855 S. La Cienega Boulevard	New smart and final 22,590 SF on existing vacant parking lot
141	Chick-Fil-A Fast Food Restaurant	5208 W. Centinela Avenue	New fast food restaurant with drive-thru 4,642 SF
142	Townhomes	10501 S. Buford Avenue	11-unit townhouse
143	Apartments	10609 S. Inglewood Avenue	9-unit apartment
144	Apartments	10907 S. Inglewood Avenue	4-unit apartment
145	Apartments	10136 Felton Avenue	19-unit apartment
146	Condominiums	5053 E. 109 Street	17-unit condominiums
147	Restaurant	5301 W. Centinela Avenue	1,640 kSF restaurant
148	Residential	6109 Overhill Drive	2-unit duplex
149	Apartments	1034 W. 109th Place	9-unit apartment
150	Church	10335 S. Vermont Avenue	1.324 kSF church
151	Apartments	10401 S. Vermont Avenue	1-unit apartment and 0.25 kSF commercial use
152	Apartments	1023 W. 107 Street	8-unit apartment
153	Mixed-Use	Bounded by Century Boulevard, La Cienega Boulevard, Arbor Vitae Street and Vicksburg Avenue	Office 300 kSF; hotel 400 rooms; retail 200 kSF; conference center 100 kSF
154	Theater and Education Center	10341 Graham Avenue	1000-seat theater and 12,417 kSF education center
155	Apartments	3831 W. Stocker Street	127-unit apartment
156	Mixed-use Development	3900 W. Martin Luther King Boulevard	Office 50 kSF; condominiums 200 units; college 3,600 students
157	Senior Housing	4018 S. Buckingham Road	130-unit senior housing
158	Middle School	4115 W. Martin Luther King Boulevard	500 middle school students
159	Apartments	4252 S. Crenshaw Boulevard	111-unit apartment
160	Mixed-use	5950 W. Jefferson Boulevard	Office 64 kSF; retail 4 kSF; quality restaurant 2 kSF; high-turnover restaurant 2 kSF

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No.	Project	Address	Project Description
161	Mixed-use	6024 W. Jefferson Boulevard	Office 123,572 kSF; manufacturing 64,206 kSF; coffee shop with drive-thru 2.2 kSF
162	CVS Pharmacy	8620 Western Avenue	Construct 11,702 SF CVS pharmacy with drive-thru
163	Apartments	3130 Slauson Avenue	Construct a net of 782 du apartments
164	Self-storage Facility & Apartment	7366 Osage Avenue	Three-story, self-storage facility with 3 du apartment to replace existing 8,945 mortuary building
165	Hotel	5250 Century Boulevard	Change of use from office to 452-room hotel with restaurant (3 kSF) and office (8,225 SF)
<b>City of Culver City</b>			
166	Entrada Creative Office	6161 W. Centinela Boulevard	281,209 SF office
167	Bentley Condos	3873 Bentley Avenue	3 new condominium dwelling units, resulting in 2 net new dwellings
168	Mixed Use	6221 Bristol Parkway	Includes 750 du apartments and 21,000 SF retail. Existing 60,157 SF retail to be removed
169	Pennylane Mixed-Use	11924 Washington Boulevard	3,750 SF restaurant, 11,250 SF retail, and 98-unit apartment. Existing 26,445 SF office/commercial to be removed
170	Residential	3837 Bentley Avenue	Addition of 3 new attached condominiums (net addition of two units)
171	Lorcan O'Herilhy Architects	3434 Wesley Street	New TOD Mixed Use project with 15 du, and 14,237 SF of office/gallery on a vacant lot
172	Residential	3906 Sawtelle Boulevard	Addition of one (1) new unit to an existing triplex
173	Harbor Freight	4545 Sepulveda Boulevard	28,534 SF retail
174	Residential	3832 Bentley Avenue	Four (4) new attached two-story residential condominium dwelling units (net addition of three (3) units) with subterranean parking
175	Residential	4109-4111 Duquesne Avenue	Addition of 2 residential units to existing duplex
176	Condominium/Townhome Redevelopment	4241 Duquesne Avenue	New three detached condominium/townhomes, resulting in 2 net new residential dwelling units
177	Residential	4180 Duquesne Avenue	New two-story, 4-unit condominium development
178	Residential	4234 Sawtelle Boulevard	Three (3) unit condominium with subterranean parking
179	Commercial Building	11198 Washington Place	New 3,850 SF commercial building and 500 SF outdoor dining
180	Office and Retail Building (Culver Pointe)	5800 Bristol Parkway	281,400 SF office

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No.	Project	Address	Project Description
181	Gas Station Car Wash	11197 Washington Place	Conversion of existing vehicle repair and mini-mart into drive-thru car wash and construction of new 2,500 SF convenience store
182	Parcel B	9300 Culver Boulevard	118,000 gSF of office, retail, and restaurant space
183	Retail/Office	5450 Sepulveda Boulevard	14,000 SF commercial/retail building
184	TOD	8770 Washington Boulevard	Planned development/TOD mixed-use with 31,240 SF retail/restaurant and 115 du two-story residential units
185	Mixed-use	11281 Washington Place	New four-story mixed-use project with 4,898 SF retail and 14 residential dwelling units
186	Globe Housing Project	4044-4068 Globe Avenue	A total of 10 new residential dwelling units on existing vacant land. The site was previously developed with 7 single family homes
187	Residential	4227 Ince Boulevard	Subdivision of one (1) parcel into three (3) lots with two (2) units per lot, totaling six (6) du, resulting in five (5) net new units
188	Kayvon Mixed-Use Project	12712-12718 Washington Boulevard	New four-story mixed-use building with 5 for lease residential units, 3,414 SF retail, and subterranean parking. Approximately 2,340 SF existing/previous commercial uses
189	Retail/Restaurant Project	8511 Warner Drive	Five level parking structure with retail/restaurant - 51,520 SF of retail/restaurant uses. Parking Structure -307,522 SF
190	Residential	4034 La Salle Avenue	New two-story, 4-unit condominium development
191	Residential and Nursing Home	3814 Lenawee Avenue	New 8 single family dwelling units and 95 unit, 110 bed, assisted living and memory care
192	Residential	3961 Tilden Avenue	Five (5) new attached two-story residential condominium dwelling units (net addition of two (2) units) with subterranean parking
193	Shell Car Wash	11224 Venice Boulevard	New 3,150 SF commercial building, which includes a 2,285 SF convenience store and 864 SF automated car wash facility
194	The Culver Studios	9336 Washington Boulevard	Net increase of 413,127 SF of office and support facilities
195	Residential	4118 Wade Street	New 4-unit townhome subdivision
196	Mixed-Use	9355 Culver Boulevard	Three-story mixed use building consisting of a ground level salon, mezzanine, and office totaling 2,947 SF, and four residential units on the third floor
197	Costco Expansion	13463 Washington Boulevard	A 31,023 SF expansion of an existing 142,152 SF retail warehouse and demolition of an existing 63,213 SF grocery

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No.	Project	Address	Project Description
198	Mixed-Use	3710 & 3750 S. Robertson Boulevard	store/supermarket. Addition of two fuel pumps at existing fueling station
199	Office and Retail	11012-11014 Washington Boulevard	141-unit apartment, 30,000 SF retail, 64,200 SF office. Existing FedEx distribution center to be removed
200	Baldwin Site Mixed-Use Project	12803 Washington Boulevard	Two-story office and retail building totaling 3,385 KSF
201	Office	12038 Washington Boulevard	Mixed-use project consisting of 37 du and 7,293 SF of retail
202	Mixed-Use	9735 Washington Boulevard	New 2,685 SF office building New four-story 166,254 SF retail and office building, with 55,477 SF office, 12,379 SF retail and restaurant, and 228 parking spaces
203	Office Building	9919 Jefferson Boulevard	New three-story, 62,558 SF, office and research and development (laboratory) building, as well as a five(5) level parking structure containing 398 parking spaces, and associated site improvements
204	Washington & Helms Mixed-Use Development	Helms Avenue & Washington Boulevard	262-unit apartment, 69,500 SF office, 22,000 SF retail, 5,000 SF restaurant. Existing manufacturing, retail, auto body, residential uses to be removed
205	Residential	12464 Washington Place	New 3-unit residential condominium subdivision (net addition of two (2) units) with on-grade parking garages
206	Residential	4115 Lincoln Avenue	New 2-unit condominium
207	Residential	3603 Wesley Street	Two new units with reduced backup aisle from parking spaces
208	Mixed-Use	8777 Washington Boulevard	Construct 4,500 SF of retail and 128,000 SF of office use. Demolish existing 12,485 SF of retail use and 4,731 SF of restaurant use
209	Mixed-Use	8888 Washington Boulevard	Construct new office building with 59,325 SF of office use, 2,878 SF of retail, and 3,184 SF of restaurant. Demolish existing 9,992 SF auto repair shop
210	Market Hall Project	NW & NE corner of Centinela Avenue/Washington Boulevard	15,526 SF specialty retail, 14,680 SF quality restaurant and 5,210 SF high-turnover restaurant
211	Triangle Site - Washington/National TOD	Corner of Washington Boulevard/National Boulevard	Transit oriented development to include 200 du, mid-rise apartments, 148-room hotel, 201,000 SF office, 24,000 SF specialty retail, 10,000 SF of high-turnover restaurant and 10,000 SF quality restaurant

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No.	Project	Address	Project Description
212	Office & Retail	10000 Washington Boulevard	Renovation of existing nine-story office building. Convert ground floor lobby space to office, retail and restaurant space. New construction includes a new stand-alone 3,115 SF one-story restaurant building and a second floor within the atrium to add 5,500 SF of office space
213	Airport Marina Ford	6002 Centinela Avenue	27,568 SF addition consisting of 29 service bays and 12,900 SF of parts and service on vacant land
214	Caroline Condominiums	3440 Caroline Avenue	Two (2) new single family dwellings, resulting in one (1) net new dwelling unit
215	Modification to CUP, Enrollment Increase (The Help Group)	12095 - 12101 Washington Boulevard	Increase in enrollment from 600 to 650 students at an existing private school for special needs students, grades Pre-K through 12
216	Union 76	10638 Culver Boulevard	Convenience store 2,676 gSF
217	Stoneview Nature Center	5950 Stoneview Drive	A new four-acre park with a new one-story 4,000 SF building, with a multi-purpose room, staff office, and restrooms
218	Orchard Supply Hardware	11441 Jefferson Boulevard	Addition of 12,737 SF to an existing 19,406 SF commercial space used as a retail office supply store, to be used as a home improvement store, within an existing 36,538 SF multi-tenant commercial building, and conversion of an existing 4,988 SF paint store into an indoor nursery area
219	Grandview Apartments	4025 Grand View Boulevard	New three-story, for lease housing development, consisting of 36 units, with subterranean parking. Previous/existing use includes 20 mobile home units
220	Retail Building	3030 La Cienega Boulevard	Addition of 1,250 SF of retail floor area to an existing 8,338 SF retail building, and new tandem parking
221	The Bridge	6066 Washington Boulevard	Addition of 3,246 SF of commercial (office) floor area with additional stacked/automated parking, to an existing 5,231 SF commercial building
222	4-Unit Sawtelle Condo's	4041 Sawtelle Boulevard	Four (4) new condominium dwelling units, resulting in three (3) net new dwelling units
223	Wouldows School CUP Modification	8509 Higuera Street; 8476 Warner Drive	Modification to previously approved CUP to allow a playground and increase student enrollment by 100, from 475 to 575, consistent with School Master Plan
224	Auto Repair Facility	2926 La Cienega Boulevard	Four (4) bay auto repair use within existing car rental facility

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No.	Project	Address	Project Description
225	4-Story Commercial	5645 Sepulveda Boulevard	New four-story office building approximately 3,193 SF retail on ground floor and 38,712 SF medical office, 5-level subterranean garage (198 parking spaces). Demolition of approximately 5,000 SF of existing commercial building.
226	Robertson Mixed Use	3727 Robertson Boulevard	New four-story mixed-use development, including approximately 8,135 SF of commercial floor area and eight (8) du. Demolition of approximately 6,800 SF 1-story commercial building and surface parking
227	Washington/Tivoli Mixed Use Project	13112-13114 Washington Boulevard	Mixed-use project with 1,536 SF of retail/restaurant (breakdown unknown at this time), 3,702 SF of office, and two (2) residential dwelling units. Previous/existing uses: vacant land
228	Automated Parking	5977 Washington Boulevard	New 48 space stacked parking facility on a property with a vacant commercial building, to serve as off-site parking for commercial building at 5965 Washington Boulevard
229	Stacked Parking - NFL Building	10950 Washington Boulevard	Addition of approximately 150 parking spaces through installation of two (2) to four (4) level parking stackers and surface lot restriping for tandem parking to support existing media offices. No additional square feet
230	Jackson Condos	4051 and 4055 Jackson Avenue	New nine (9) unit residential condominium project replacing six (6) existing units, for a net increase of three (3) du
231	Jazz Bakery	9814 Washington Boulevard	New 200 seat Performance Theatre with a museum and bakery/café, 2-stories and estimated 7,500 SF, on a property developed with a vacant residential structure
232	Boutique Hotel	11469 Jefferson Boulevard	Demolition of 12,958 SF commercial shopping center. New five-story hotel of 183 rooms with restaurant and outdoor dining
233	Park Century School	3939 Landmark Street	New athletic field, 2,441 SF classroom building, and two-level subterranean parking, to allow an increase in student enrollment from 120 to 170 and increase of 20 staff people
234	ECF Site	8700, 8710, 8740, and 8750 Washington Boulevard	Preliminary concept - Mixed-use TOD with approximately 199 residential units and 40,00 SF of commercial space (17,250 SF of live/work space, 5,000 SF of restaurant, and 17,750 SF of retail), on a 3.06 to possibly 3.53 acre site, currently developed with multiple uses

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No.	Project	Address	Project Description
235	Bristol Parkway Mixed Use	6201 Bristol Parkway	New mixed-use project, including 16,000 SF of commercial retail/restaurant space, 775 residential dwelling units, and 850 parking spaces on a six (6) acre site. Existing shopping center (approximately 60,000 SF of commercial floor area) to be demolished
236	Office Building	11259 Washington Boulevard	New three-story, 3,682 SF office building with at-grade parking, on an existing vacant site
237	Commercial Building	4333 Sepulveda Boulevard	Commercial building addition 2,971 kSF
238	Residential	9615 Lucerne Avenue	New 2-unit condominium
<b>City of El Segundo</b>			
239	Raytheon Campus Specific Plan Office Park Expansion	2100 El Segundo Boulevard	Existing 2,089 kSF light industrial to be replaced with 7.2 kSF retail, 3.5 kSF bank, 9 kSF full service restaurant, 7.3 kSF fast food restaurant, and 43 kSF medical office.
240	Hotel	888, 892 and 898 N. Sepulveda Boulevard	Five-story 190-room, 107,090 gSF hotel on vacant parcel and operate airport park and ride facility on existing 840-space parking structure
241	Convert Warehouse to Office	2265 E. El Segundo Boulevard	Convert 3,050 SF existing warehouse to office use
242	Wiseburn School District H.S.	201 N. Douglas	335,000 SF total for new high school after demo of 90,000 - 170,000 SF. New high school to contain 180,000 to 240,000 SF of building area and an enrollment of 1,200 students
243	Convert Parking to Hotel	199 Continental Boulevard	152-room hotel, 71,000 SF, to replace existing parking lot
244	Condominiums	711 Main Street	Existing 2-unit (2,758 SF) residential to be expanded to 4-unit (6,963 SF)
245	Office	400 Duley Road	73,000 SF office on vacant parcel
246	Industrial Addition	750 S. Douglas	Additional 4,986 SF to existing 15,076 SF industrial building
247	Corporate Office and Athletic Training Facility	2275 Mariposa Avenue	120,380 SF total new - 52,000 SF corporate office plus 68,380 SF athletic training facility
248	New Office	500 S. Douglas and 2330 Utah Avenue	New 80,000 SF office to replace existing 55,000 SF industrial use
249	Office	123 Nevada Street	New 4-unit commercial office condominium converted from 1,700 SF industrial uses
250	Office and Private Hotel	2125 Campus Drive	A 500-space parking structure, 49,111 SF office building and 104,415 SF office building replacing vacant land
251	Office Boeing S-50 Building Addition	1700 E. Imperial Avenue	Addition of 96,898 kSF to existing 169,390 SF building
252	Condominiums	535 Indiana Street	4-unit condominium to replace 1 single-family unit

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No.	Project	Address	Project Description
253	Data Center/Office	445 N. Douglas Street	New 314,288 SF data center to replace 223,000 SF land use (106,000 SF office and 117,000 SF warehouse industrial)
254	El Segundo Corporate Campus	710 N. Nash Street	611,545 SF office plus 13,660 SF retail on an existing vacant parcel
255	Office	1950 E. Grand Avenue	93,569 kSF office
256	Hotel	101 Continental Boulevard	167-room hotel
257	Data Center/Office	444 N. Nash Street	Demolition of 11,769 SF and construction of 75,435 SF data center. New total: 180,422 SF data center
258	Hotel	1960 E. Grand Avenue	150-room hotel
259	Residential	425-429 Indiana Street	8 residential units
260	Condominiums	616-620 W. Imperial Hwy	12 unit condominiums
261	Condominiums	301, 303, 305 W. Palm Avenue	7 unit condominiums, replacing existing 9-unit apartments
262	Mattel Grand Way Project - Phase II	455 Continental Boulevard and 1955 E. Grand Avenue	New fourteen-story 300,000 SF R&D office tower and 810-space parking structure (existing 55,000 SF office)
263	Walgreens	331 N. Pacific Coast Hwy	67 kSF retail
264	Parking Structure	525 N. Sepulveda Boulevard	1,029 space 328,532 kSF parking structure
265	Mixed-Use Commercial	141 Main Street	12,550 kSF mixed-use commercial
266	Warehouse, Office, Manufacturing	900, 950 Sepulveda Boulevard & 960, 901 - 915 Selby Street	20,819 kSF warehouse, 139,558 kSF office, 14,025 kSF manufacturing; from existing 80,165 kSF warehouse, 72,084 kSF office, 2,554 kSF manufacturing
267	Senior Assisted Living Facility	540 E. Imperial Avenue	304 senior housing residential units or 58 single and multifamily (175,000 SF); previously 22.5 kSF school
268	Indoor Ice Rink	555 N. Nash Street	17,315 kSF indoor ice rink
269	Office	116 W. El Segundo Boulevard	38 kSF office
270	In-N-Out Burger Fast-Food Restaurant with Drive-Thru	600-630 Sepulveda Boulevard	Existing Sizzler (sit-down dining) to become 3,714 kSF fast-food restaurant with drive-thru
271	Light Industrial	123 Lomita Street	10,764 kSF light industrial
272	General Office	2130 E. Maple Avenue	20,955 kSF general office
273	Research and Development	140 Sheldon Street	7,116 kSF research and development office, replacing 1,756 industrial building
274	Restaurant	2171-2191 Rosecrans Avenue	13,57 kSF restaurant
275	LA Air Force Base - Area A	SE Aviation Boulevard	Remove office 835 kSF; add 525 units condominiums
276	Fast-food Restaurant with Drive-Thru	740 Pacific Coast Highway	Existing Credit Union Bank (8,100 SF) to be replaced with 4,696 gSF fast-food restaurant with drive-thru

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No.	Project	Address	Project Description
277	Hotel	707 Pacific Coast Highway	116-room hotel replacing 7.82 kSF restaurant
278	Mixed-use	2120 Rosecrans Avenue	240 kSF office; 66 kSF studio and production facilities; 7 kSF retail on existing vacant land
279	Pro Shop and Hitting-bay	400 S. Pacific Coast Highway	Three-story (71 kSF) hitting-bay and accessory use (restaurant, bar, meeting and event space) to replace existing 2,500 SF pro shop and driving range
280	Office Addition	140 Oregon Street	Additional 70 kSF office to existing office building
281	Mixed-use	401-615 N. Pacific Coast Highway	Replace existing parking lot with 263-unit apartments and 11 kSF retail/restaurant
282	Mixed-use	212 Eucalyptus Drive	Replace existing warehouse (5.35 kSF) with 13,485 kSF office and 634 SF café/food-to-go
283	Office	2221 E. Park Place	Additional 27,478 kSF office to existing office (56.6 kSF)
<b>City of Lawndale</b>			
284	Lawndale Annex	14899 Aviation Boulevard	289-unit condominium
285	Grevillea Gardens	4430 W. 153rd Street	41-unit condo and mixed use
286	Condominiums	4741 & 4743 W. 165th Street	4-unit condominium
287	Duplex Development	15133 Osage Avenue	2-unit duplex
288	Del Taco	16606 Hawthorne Boulevard	New fast food restaurant
289	Duplex Development	4212 W. 162nd Street	2-unit duplex
290	Condominiums	4720 & 4724 W. 164th Street	4-unit condominium
291	Duplex Development	4136 W. 160th Street	2-unit duplex
<b>County of Los Angeles</b>			
292	Proposed Aviation Station Project	11604 Aviation Boulevard	Lot 1: 281-unit condo/townhomes; 5 kSF retail/commercial; Lot 2: 112-unit apartment and 21.5 kSF retail/commercial
293	West Los Angeles Community College Master Plan	Overland Avenue at Freshman Drive	Approximately 291,300 SF of new building and renovation. Anticipate future student population of approximately 18,904 students and 1,248 employees by Fall 2022. Project includes second access road, parking structures, landscaping and development of athletic facilities
294	Lennox Charter High School	11044 and 11111 Freeman Avenue	560 students
295	Marina Expressway Homes	Marina Expressway Eastbound & Mindanao Way	28 single family condominiums

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4.0 Environmental Impact Analysis

No.	Project	Address	Project Description
296	Marina del Rey Local Coastal Program	1 Marina Expressway	Marina Del Rey Local Coastal Program (MDR LCP) Amendment. Development includes residential: 2,044 du, hotel: 505 rooms, retail: 273,741 SF, restaurant: 1,323 seats, congregate care: 129 du, office: 26,000 SF, dry storage space: 375 spaces, and library: 3,000 SF
297	Senior Housing	1252 W. 105th Street	74-unit, 100% affordable senior housing in the R-2 Zone
298	Laundromat	11034 S. Western Avenue	New use laundromat for a total 4,983 SF
299	Residential	5550 S. La Brea Avenue	32-unit apartment
300	Office Addition to Child Care Center	3816 W. 54th Street	New 2-floor office space 1,196 SF
301	Mixed-Use	11810 Bandera Street	100-unit affordable housing apartment, 5,260 SF child care center, 7,200 SF office
302	Residential	13204 Salinas Avenue	94-unit condominiums
303	Residential	1212 W. 107th Street	22-unit apartment
304	Hotel	12000 S. Western Avenue	44-room hotel
305	School	11130 S. Western Avenue	11,662 SF school
306	Hotel	11814 Aviation Boulevard	128-room hotel
307	Residential	1743 Imperial Highway	39-unit apartment
308	Residential	1423 W. 120th Street	57-unit condominiums
309	Residential	1509 W. 102nd Street	12-unit apartment
310	Residential	1539 102nd Street	10-unit apartment
311	Residential	8910 S. Normandie Avenue	6-unit apartment
312	Commercial	10601 S. Vermont Street	4,500 SF coin laundry and self-service car wash
313	Residential	215 E. El Segundo Boulevard	9-unit single-family homes
314	Auto Repair	9223 S. Vermont Avenue	2,858 SF auto mechanic shop
315	Warehouse	12804 Spring Street	4,096 SF warehouse
316	Apartments	11824 Aviation Boulevard	36-unit apartment (20 three-bedroom units, 4 two-bedroom units, 12 one-bedroom units), 58 parking spaces, 28 bicycle parking spaces; five-story
317	Apartments	10505 Hawthorne Boulevard	32-unit apartment complex, with 5 units set aside for low-income tenancy
318	Apartments	14733 S. Stanford Avenue	85-unit apartment
319	Charter Middle School	5343 S Mullen Avenue (or 3751 W 54th Street)	Charter middle school

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No.	Project	Address	Project Description
320	multifamily Residence Development	5101 S. Overhill Drive	Create one multifamily residence lot developed with 88 attached single-family residence condominium units on 1.875 acres
321	Dollar Tree Store	3838 W. Slauson Avenue	Convert commercial building into Dollar Tree Store; approved for a 1,060 SF addition to an existing commercial building; 9,877 SF total
322	Apartments	1240 W. 105 Street	42-unit apartment building
323	Arco Gas Station	11408 S. New Hampshire Avenue	Construction of new Arco gas station with 2,900 SF convenience store
324	Residential	2178 Firestone Boulevard	Residential care 16 beds
325	Mixed-Use	905 E. El Segundo Boulevard	Community center 1 kSF; amphitheater and lawn 1,100 seats; music center 1 kSF; nature lab 1 kSF; museum gallery 1 kSF; museum art storage 1 kSF; aquatic center 1 kSF; gymnasium 1 kSF; multi-purpose stadium 3,000 seats; outdoor athletic fields 3 fields; equestrian center 85 stables
326	Apartments	1854 E. 118th Street	100-unit apartment
327	Homeless Shelter	13200 S. Avalon Boulevard	Homeless shelter 79 rooms
328	Apartments	11735 Holmes Avenue	61-unit apartment
<b>City of Hawthorne</b>			
329	Residential	Bounded by Ramona Avenue to the west, 116th Street to the north, 118th Street to the south, and Grevillea Avenue to the east	128 single family homes
330	360 South Bay	SE corner of Aviation Boulevard and El Segundo Boulevard	610 condominiums
331	Condominiums/Office	13806 Hawthorne Boulevard	171 units and 32,500 SF of office space
332	Prestige Villas	4500 W. 116th Street	128 detached condominiums
333	Single Family Homes	14000 Yukon Avenue	6 units
334	Downtown Hawthorne Specific Plan	The area boundaries include the I-105 Freeway on the north, Prairie Avenue, Freeman Avenue and its extension through residential neighborhood to the city limits on the south, and Ramona Avenue and Inglewood	The DHSP designates five land use areas (Residential, Commercial, Hospitality, Mixed-Use and Public/Quasi Public) and four opportunity sites known as Transformative Projects. The four Transformative Projects in the DHSP are sites identified for new and catalytic development and investment and are listed below

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No.	Project	Address	Project Description
335	Civic Center	Avenue on the west. In addition to the major north-south arterial Hawthorne Boulevard, the DHSP area includes the east-west segments of Imperial Highway, 120th Street, El Segundo Boulevard, and Rosecrans Avenue	A public-private partnership opportunity that can have a mix of civic, hotel, retail and housing uses that frame a community gathering space A mid-scale mixed-use development that helps catalyze the southern portion of Hawthorne Boulevard. Medium and higher density residential development An underutilized corner that can become a new, dynamic public space. No set dates. DT Hawthorne Specific Plan design ideas suggest a local plaza for the community
336	South Bay Ford		Proposed outlet but no set date for development - existing a shuttered mall
337	St. Joseph's Plaza		
338	Hawthorne Mall Site		
339	Green Line Specific Plan Project (Dinerstein Companies Residential)	SE corner of Crenshaw Boulevard and Jack Northrop Avenue	230 du apartments and 3,700 SF of restaurant
340	Icon at Rosecrans	14135 Cerise Avenue	127 residential units (affordable housing)
341	Marriott Hotels (Courtyard and TownePlace Suites)	4427 El Segundo Boulevard	350 rooms and full-service restaurant
342	Hilton Hotel (Garden Inn)	11519 Acacia Avenue	119-room hotel
343	Residential	11845 Grevillea Avenue	Condos 13 units
344	Residential	3222 W. 139th Street	Condos 7 units
345	Residential	3670 W. Imperial Highway	96 condominium units with 2,000 SF retail space
346	Residential	3857 W. 139th Street	Condos 12 units
347	Residential	13403 Kornblum Avenue	Condos 12 units
348	Residential	14128 Kornblum Avenue	Condos 100 units
349	Residential	14412 Yukon Avenue	Condos 11 units
350	Residential	11416 Inglewood Avenue	Condos 13 units
351	Residential	14105-14137 Chadron Avenue	109 residential units (24 units affordable to moderate income households)
352	Residential	14004 Doty Avenue	22 residential units (6 units moderate income households)
353	Hotel	5151 El Segundo Boulevard	129-room hotel with minimum of 125 parking spaces
354	Costco Gas Station Expansion	14501 Hindry Avenue	Costco gas station expansion
355	Costco Gas Station	12530 Prairie Avenue	Costco gas station
356	Residential	12021 Hawthorne Way	3 single family homes
357	Mixed Use	3670 Imperial Highway	approximately 13,938 SF of commercial and 48 condominiums

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No.	Project	Address	Project Description
358	Parking Structure	East side of Crenshaw Boulevard (between 120th Street and Northrop Avenue)	Seven-story parking structure - approximately 1,469 stalls
<b>City of Gardena</b>			
359	Townhomes	1335 W. 141st Street	50 du townhomes, three-story
360	Mixed-Use	1450 W. Artesia Boulevard	Construction of 73,600 SF industrial uses, 16,000 SF office uses, and 147,200 SF storage uses
361	Industrial	1720 W. 135th Street	100,438 SF industrial building
362	Residential	16819 Normandie Avenue	Single room occupancy, 63 units
363	Residential	14321 Van Ness Avenue	40 condos/townhomes and 1,835 SF retail
364	Residential	1715 W. 149th Street	5-unit townhouse development
365	Residential	1333 168th Street	3-unit condo development
366	Residential	1348 W. 168th Street	Small lot subdivision, 9-unit apartment
367	Commercial	16016 S. Western Avenue	9,685 SF addition to existing commercial office building
368	Commercial	15106 South Western Avenue	Refacade of an existing 5,895 SF building and change use from automotive repair to retail commercial
369	Commercial	16210 Crenshaw Boulevard	New 4,860 SF drive-thru restaurant
370	Commercial	15930 S Western Avenue	New two-story medical and professional office building, 6.43 kSF
371	Residential	13919 Normandie Avenue	Single room occupancy, 20 units
372	Residential	1341 W. Gardena Boulevard	14 townhomes and 3,385 SF of retail/office
373	Commercial	1399 W. Artesia Boulevard	4,733 SF gas station at an existing Sam's Club retail store (16 fuel positions)
374	Commercial	15501 S. Normandie Avenue	Refacade existing shopping center and develop a new a 1,850 SF drive-thru restaurant
375	Commercial	14105 S. Vermont Avenue	Construction of a new 1,500 SF restaurant
376	Commercial	1201 W. 155th Street	11,550 SF Dialysis Health facility
377	Residential	14504 S. Normandie Avenue	96 townhomes
378	Residential	15350 Van Ness Avenue	42 townhomes
379	Residential	16908 S. Normandie Avenue	21 single family homes
380	Residential	1147 W. Gardena Boulevard	multifamily (apartments), 4 units
381	Residential	16958 S. Western Avenue	46 townhomes
382	Residential	15927 S. Brighton Avenue	multifamily (apartments), 2 units
383	Retail	525 E. Rosecrans Avenue	3.14 kSF of retail

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No.	Project	Address	Project Description
384	Mixed-Use	1112 Gardena Boulevard	12 apartment units and 3,986 SF of commercial space
385	Townhomes	1515 W. 178th Street	New 114 unit townhomes on existing 105,036 SF warehouse
386	KB Home Stonefield	1017 W. 141st Street and 14031 S. Vermont Avenue	Three-story townhomes, 63 units
387	Restaurant	1420 Redondo Beach Boulevard	Restaurant, 4,053 kSF
388	Townhomes	2315, 2401, 2403, 2415, 2421, & 2545 Marine Avenue	54 townhomes and 10 live/work, a total of 64 units
389	Mixed-Use	2129 Rosecrans Avenue	113 du townhomes, three-story, including 15 live/work with 3,969 SF commercial
390	Industrial	1528 W. 134th Street	New 62,960 SF industrial building
391	Restaurant	2169 Redondo Beach Boulevard	New 3,485 SF drive-thru restaurant
392	Transit-Oriented Development SP Project	12850 Crenshaw Boulevard	265 du, apartments/studio apartments
393	Townhomes	1938 W. 146th Street	6 du townhomes
394	Residential	13615, 13619, 13633 Vermont Avenue	84 du, 82 market rate units (2 du affordable)
395	Townhomes	1621 W. 147th Street	6 du townhome, three-story

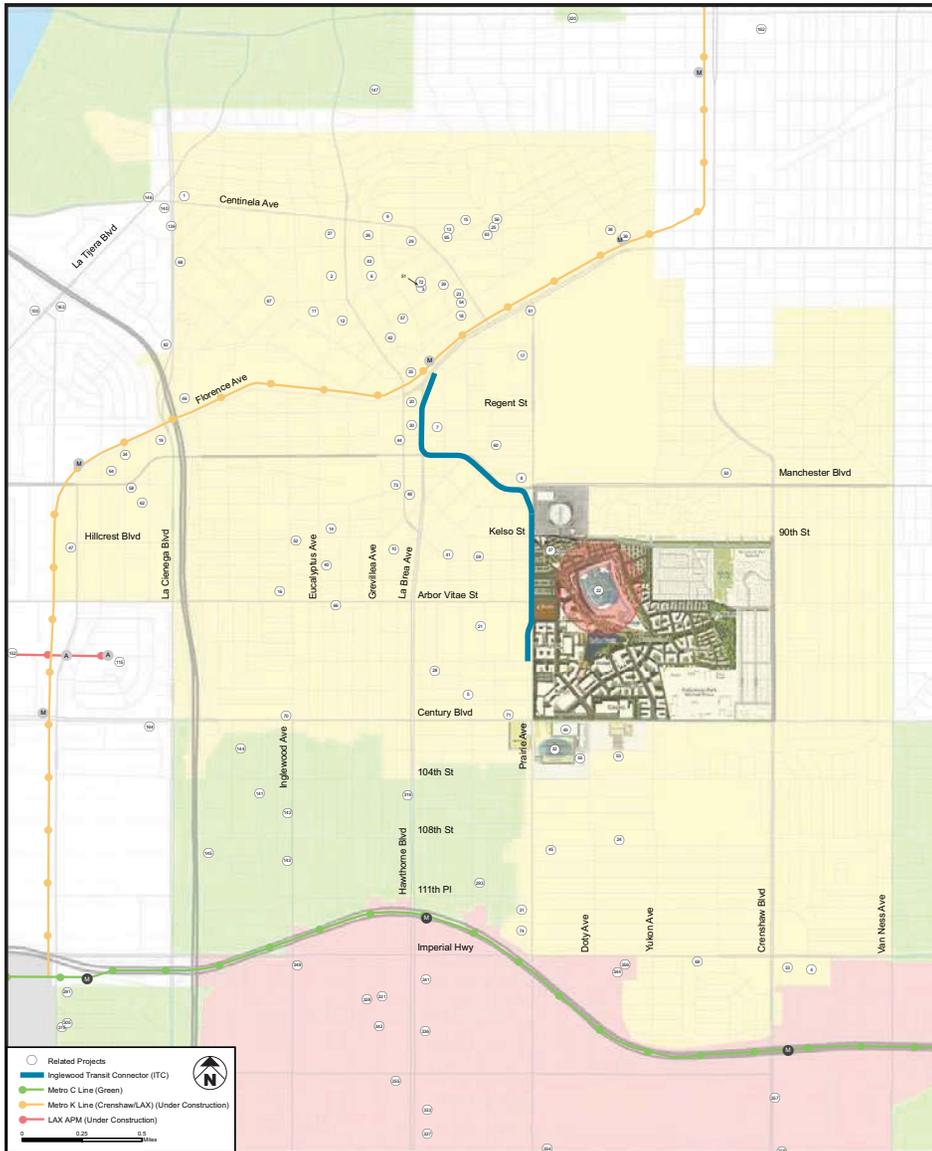
Source:

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- [7] Traffic Impact Study, Continental Grand Campus Specific Plan DEIR, September 2017.
- [8] Final Environmental Impact Report, Green Line Mixed-Use Specific Plan, June 2017.
- [9] Traffic Study for the Landside Access Modernization Program (LAMP) DEIR, September 2016.
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Inglewood Transit Connector Project  
November 2021



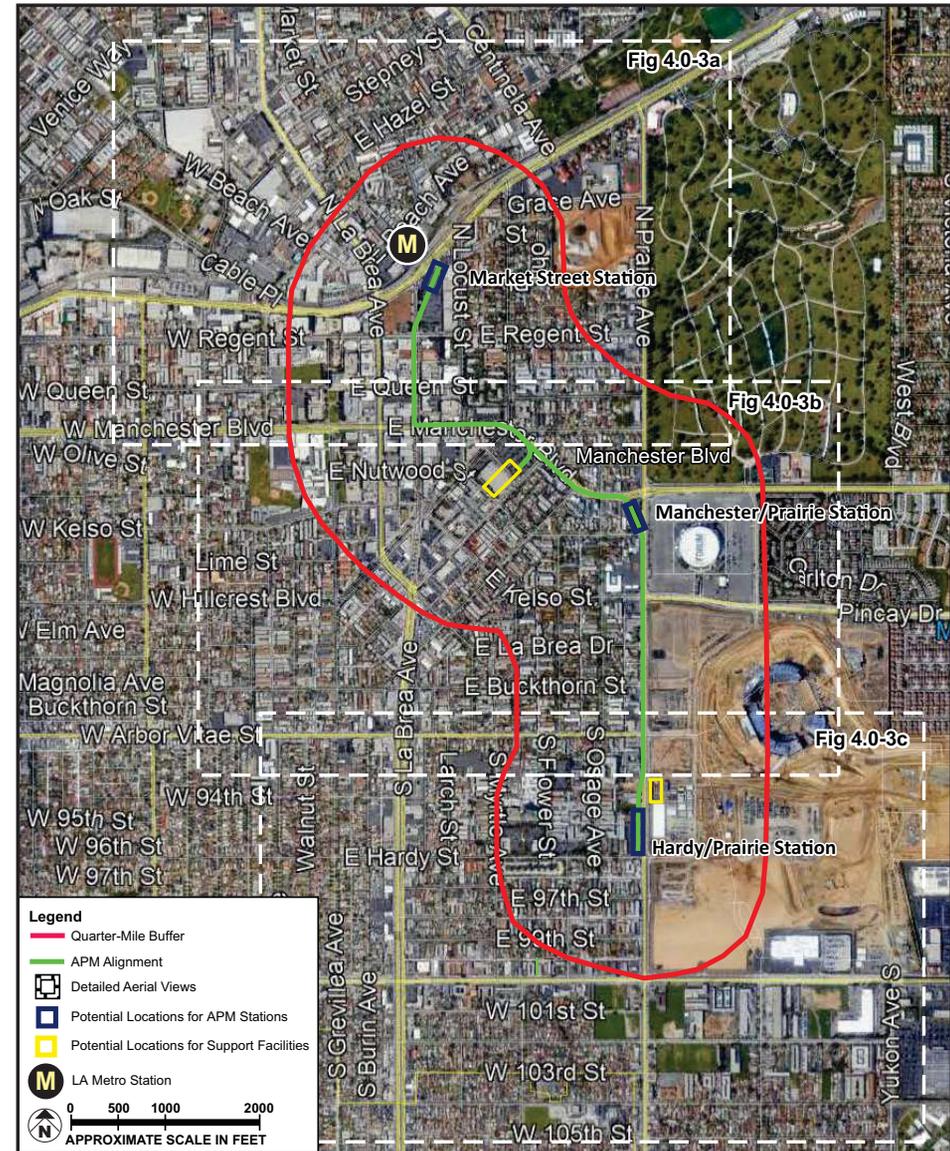
SOURCE: Raju Associates - 2020

FIGURE 4.0-1

Cumulative Projects Map



251-003-20



SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021

FIGURE 4.0-2

Map of Sensitive Receptors - Index



251-003-20

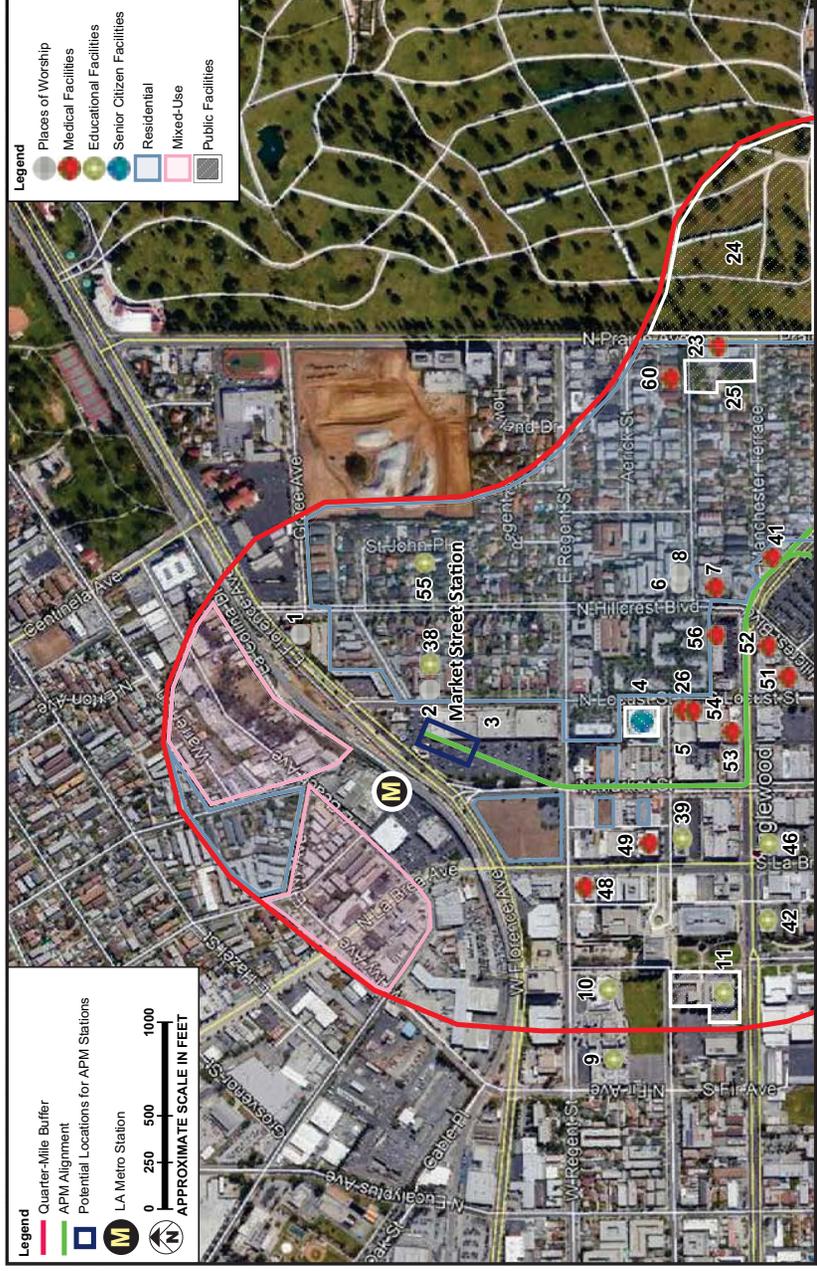


FIGURE 4.0-3a

Sensitive Receptors within a Quarter-Mile of the Project Area



251-003-20

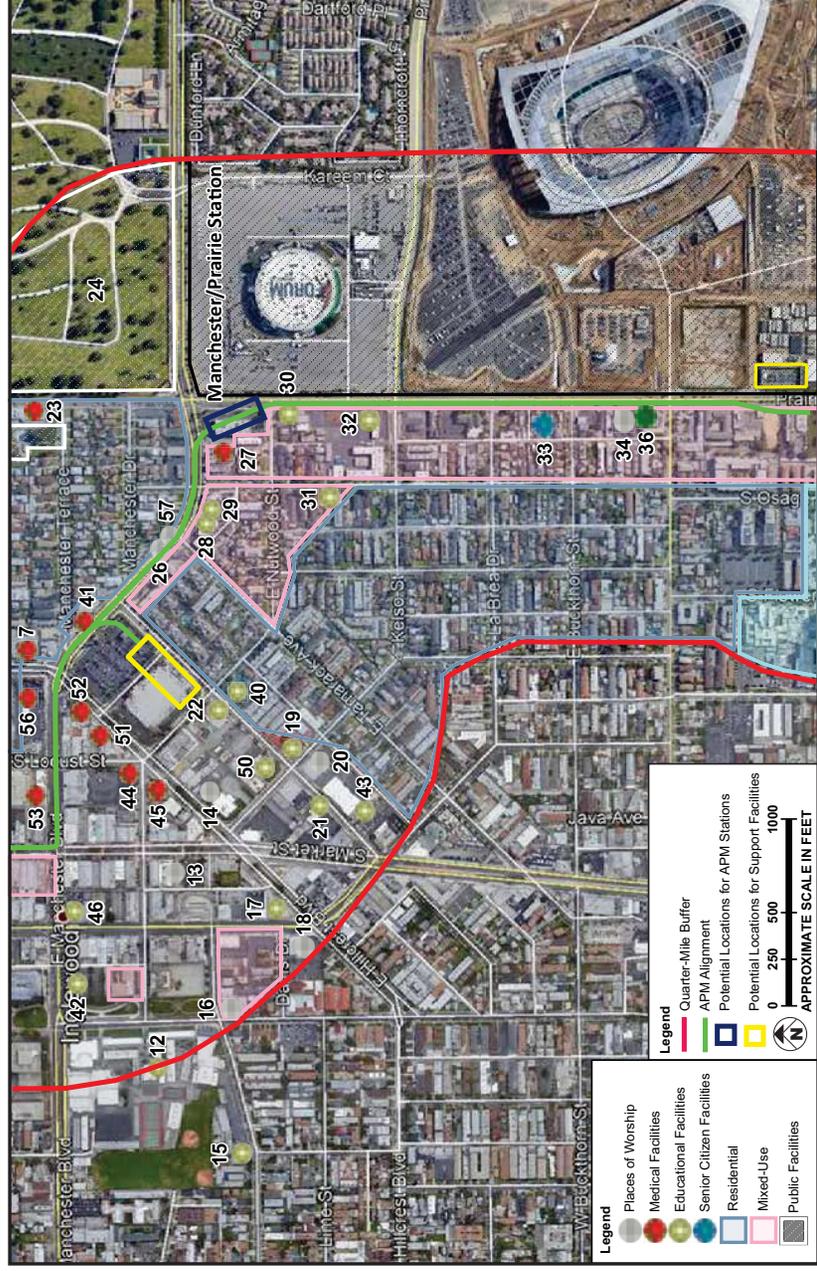


FIGURE 4.0-3b

Sensitive Receptors within a Quarter-Mile of the Project Area



251-003-20

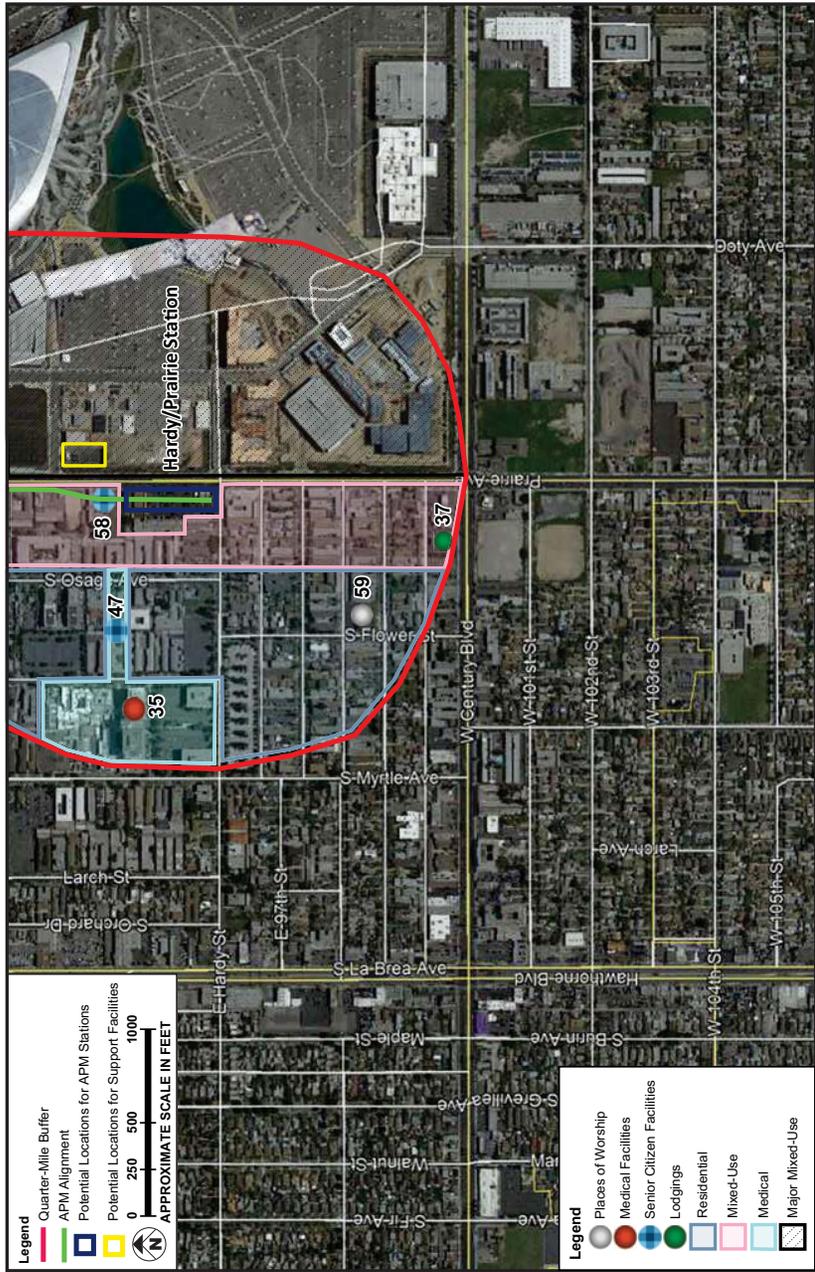


FIGURE 4.0-3c

Sensitive Receptors within a Quarter-Mile of the Project Area

SOURCE: Google Earth - 2021; Meridian Consultants - 2021



251-003-20

## 4.1 AESTHETICS

### 4.1.1 INTRODUCTION

This section of the Recirculated Draft Environmental Impact Report (Recirculated Draft EIR) evaluates the impacts of the proposed Inglewood Transit Connector Project (proposed Project or ITC Project) on aesthetics and visual character, obstruction of views, nighttime illumination, light and glare, and shading. The evaluation of aesthetics and visual character impacts considers the existing visual character of the area along the proposed alignment, and how implementation of the proposed Project would affect this visual character. The evaluation of view impacts considers existing viewsheds and visual resources that may be affected by the development of the Project alignment. The analysis of light and glare assesses the effects of new sources of nighttime lighting and glare from the reflection of sunlight or artificial light from any reflective surface that would be created by the Project. This section also evaluates patterns of shading that would be created by the proposed Project and the effect on uses along the proposed alignment.

Prior to the preparation of the December 2020 Draft EIR, a Recirculated Initial Study was prepared using the California Environmental Quality Act (CEQA) Environmental Checklist Form to assess potential environmental impacts associated with aesthetics. For two of these screening thresholds, the Initial Study found that the proposed Project would result in a “Less than Significant Impact,” and thus, no further analysis of these topics in an EIR was required. The following Initial Study screening criteria related to aesthetics do not require any additional analysis in this Recirculated Draft EIR:

- Impacts related to a substantial adverse effect on a scenic vista were evaluated and determined to be “Less than Significant” in the Initial Study. As discussed therein, the City of Inglewood (City)’s General Plan does not designate any scenic vistas within the City or its vicinity. Additionally, no views of regional mountain ranges, focal points, or broad panoramic view corridors are available from public rights-of-way along the proposed alignment. Therefore, impacts on scenic vistas from the proposed Project would be **less than significant**.
- Impacts related to substantial damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway were evaluated and determined to be “Less than Significant” in the Initial Study. As discussed therein, the Project alignment is not located in the vicinity of a designated scenic highway. Thus, no trees or historic resources on the Project alignment are located within a State scenic highway. Additionally, no rock outcroppings are present on or near the Project alignment. Therefore, impacts on scenic resources within a State scenic highway from the proposed Project would be **less than significant**.

After circulation of the December 2020 Draft EIR for public review, the City revised the design of the Project in response to consultation with key stakeholders in the community and comments received on the December 2020 Draft EIR. Changes to the Project relevant to the potential effects on the aesthetic and

visual character of the area include defining Project design features that address the visual characteristics of the Project as described below in *Section 4.1.7.1: Project Design Features*. Specific changes to the Project related to potential effects on the visual and aesthetic character of the areas surrounding the proposed alignment include raising the height of the ATS guideway along Market Street to preserve existing views of historic buildings, relocating the Prairie Avenue/Pincay Drive Station to the southwest corner of Prairie Avenue and Manchester Boulevard to avoid impacts on Kelso School, redesign of the proposed MSF to allow this facility to be located on the proposed site with a new Vons store, and realignment of the guideway and stations on Prairie Avenue to the west side of Prairie Avenue.

The changes to the design of the Project do not create the potential for significant impacts related to scenic vistas or scenic resources as described above. There are no designated scenic vistas within the City or its vicinity nor would the revised Project be located within a State scenic highway.

Impacts found to be less than significant are further discussed in **Section 6.0: Other Environmental Considerations**.

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Draft EIR.

## **4.1.2 OVERVIEW**

### **4.1.2.1 Aesthetic Resources**

Aesthetic resources include a range of visual elements, including landforms, vegetation, water features, the urban design characteristics of an area, and the architecture present in an area that define how an observer experiences a place through sensory interaction. Factors considered include visual character, scenic resources, and scenic vistas. These factors, which describe the aesthetic character of a particular area are described further below.

#### ***Visual Character***

Visual character describes the unique combination of aesthetic resources, scenic elements, and landscape characteristics that contribute to the identity of a particular place. These components provide for the visual sensory interaction with a particular place by users who experience it. This interaction constitutes the basis of the overall impression a place has upon the observer. In urban settings, these characteristics largely include land use type and density, urban landscaping and design, architecture, topography, and background setting.

## ***Scenic Resources***

Scenic resources typically include natural open spaces, topographic formations, and landscapes that contribute to a high level of visual quality. They also include ridgelines, parks, trails, nature preserves, sculpture gardens, the built environment, and similar features that are critical in shaping the visual character and scenic identity of a given area and surrounding region.

## ***Scenic Vistas***

Scenic vistas are generally described in two ways: panoramic views which is visual access to a large geographic area, for which the field of view can be wide and extend into the distance; and focal views providing visual access to a particular object, scene, or feature of interest. In general, scenic vistas are the range by which scenic resources may be observed. This definition combines visual quality with information about view exposure to describe the level of interest or concern that viewers may have for the quality of a particular view or visual setting.

## **4.1.3 METHODOLOGY**

### **4.1.3.1 Visual Character**

Impacts on visual character were determined by comparing existing visual conditions at and around the proposed Project area alignment with the change in these conditions that would result from implementation of the proposed Project. The study area for the aesthetics analysis comprises the Project alignment and adjacent areas. The Project area includes the Automated Transit System (ATS) components, including the guideway, stations, and support facility sites (maintenance and storage facility [MSF] including the Vons supermarket, and power distribution system [PDS] substations ), and properties adjacent to the ATS and proposed components.

The methodology used to assess visual character impacts considers how the proposed Project would affect views of the area. This assessment focuses on views of the proposed Project along major roadways and on other public viewpoints where visual change would occur with implementation of the proposed Project. Public viewpoints of the Project area available to the general public traveling to or near the Project are located along Market Street, Manchester Boulevard, and Prairie Avenue.

Establishing the basis for the analysis also involved collecting and reviewing existing plans and guidelines in effect within or adjacent to the Project area that address design, architecture, and landscaping. These plans include the Hollywood Park Specific Plan<sup>1</sup> (HPSP) and the New Downtown and Fairview Heights

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<sup>1</sup> City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015.

Transit-Oriented Development Plan and Design Guidelines (Downtown TOD).<sup>2</sup> These plans define the standards for development within these areas.

#### 4.1.3.2 Light and Glare

Light and glare also influences the visual character of an area. The provision of adequate and appropriate lighting and limiting glare and the potential for glare are fundamental safety requirements in the design of any large facility or structure. The analysis focuses on light spillover effects, which involve light that shines beyond the area intended for illumination that can be a source of annoyance to adjoining properties, particularly for residences where light (e.g., direct illumination) might disturb sleep or privacy. Glare—both daytime reflection of sunlight off large expanses of reflective surface (cars, buildings, or structures) and unshielded nighttime lighting (outdoor or indoor)—can also have adverse effects. Accordingly, this section also addresses the potential for the proposed Project to: (1) introduce new light sources that could adversely affect nearby light-sensitive receptors (e.g., residential uses, hotels, and natural areas); and (2) introduce new light or glare sources that could adversely affect day or nighttime views in this area.

#### 4.1.4 REGULATORY FRAMEWORK

##### 4.1.4.1 State Regulations and Directives

###### *California Department of Transportation (Caltrans) Scenic Highway Program*

The Caltrans Scenic Highway Program<sup>3</sup> protects and enhances the natural scenic beauty of California's highways and corridors through special conservation treatment. Caltrans defines a scenic highway as any freeway, highway, road, or other public right-of-way that transverses an area of exceptional scenic quality. Caltrans designates a scenic highway by evaluating how much of the natural landscape a traveler sees and the extent to which visual intrusions degrade the scenic corridor. No officially designated scenic highways are located within the City.

##### 4.1.4.2 Local Regulations and Directives

###### *City General Plan*

The City General Plan including the Land Use Element,<sup>4</sup> was adopted in August 1968 and was amended in 1980, with additional amendments, including the latest amendment in 2020. Goals, objectives, and

<sup>2</sup> City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, November 1, 2016.

<sup>3</sup> Caltrans, *Scenic Highways*, <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>, accessed July 30, 2020.

<sup>4</sup> *City of Inglewood General Plan, "Land Use Element"* (adopted 1980, last amended 2020), <https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-PDF>.

policies of the City's General Plan Land Use Element applicable to this aesthetics section of the Draft EIR are outlined as follows:

#### Land Use Element

The Land Use Element sets forth Citywide policies for the general location and intensity of land uses, and includes the following goals and policies that are relevant to the proposed Project in this section:

##### *Downtown Transit Oriented District Goals and Policies (as amended September 2016)*

- Goal 1:** Downtown is a place to live, work, shop, recreate, and be entertained.
- Policy 1.1:** Mixed Use Development. Encourage a range of residential, retail, office, recreational, and institutional uses in the Historic Downtown to create a vibrant urban district and support local business.
- Policy 1.2:** Ground Floor Uses and Storefronts. Require uses that activate pedestrian activity such as retail on major streets and plaza frontages. Require that storefronts be historically-sensitive, attractive, and transparent in the Historic Downtown.
- Goal 2:** Downtown is a revitalized yet forward-looking gathering place for the community.
- Policy 2.1:** Public Gathering Places. Create public spaces in key locations in the public right-of-way and on privately-owned land. In particular, create a central plaza along Market Street between Florence Avenue and Regent Street and/or in the adjacent parcels suitable for eating, resting and people watching, but also for festivals, concerts, and events at special times.
- Policy 2.3:** Preservation of Historic Fabric. Require the preservation of buildings that have been designated as historic and encourage the reuse of other historic buildings. Maintain the sense of place in areas with historic fabric and/or meaning such as Market Street between Regent Street and Hillcrest Avenue and the Hillcrest neighborhood east of Locust Street.
- Goal 6:** Downtown expresses the unique culture of Inglewood.
- Policy 6.1:** Districts. Define the following unique districts within the Downtown TOD area, each with their own unifying character or

identity that should be preserved and enhanced: Historic Downtown, Civic Center, TechTown, Beach Avenue, Fairview West, Hillcrest and Queen Street.

**Policy 6.2:** Performing Arts. Build on assets such as the Fox Theater, Forum and Hollywood Park to establish Downtown Inglewood as part of an Inglewood entertainment and performing arts hub serving both the City and the region.

**Policy 6.3:** Visual Arts. Commission public art to provide an attractive environment for residents, employees, and visitors. Take steps to ensure a continuing role for the Inglewood art community in Downtown's visual and performing arts.

#### **Goals and Objectives (as adopted January 1980)**

- Promote Inglewood's image and identity as an independent community within the Los Angeles metropolitan area.
- Improve the visual appearance and economic condition of the existing arterial commercial development along Inglewood's major streets.

#### **Open Space Element**

The Open Space Element<sup>5</sup> sets forth Citywide policies for current and future recreation needs of the community for park land and recreation facilities. It is also a plan for the conservation or creation of open spaces to mitigate the effects of increasing urbanization of Inglewood. Since Inglewood lacks any natural resource such as a lakeshore or riverbank, the Element focuses on two basic types of open space: the traditional city park and the nonpark open space, including public plazas, landscaped boulevards, and greenbelts between buildings on private property. The following policy is relevant to the proposed Project in this section:

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

<sup>5</sup> City of Inglewood General Plan, "Open Space Element" (adopted 1973, last amended 1995), <https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-PDF>.

#### **New Downtown and Fairview Heights Transit-Oriented Development Plan and Design Guidelines**

The New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines<sup>6</sup> (Downtown TOD Plan) covers the Downtown Inglewood and Fairview Heights neighborhoods of the City and works to implement the City's vision for transforming the quality of the environment within these areas. The Downtown TOD Plan area consists of approximately 585 acres located in the center of Inglewood along the new Metro K line just east of the Florence Avenue/La Brea Avenue intersection. This TOD Plan area extends approximately one-half mile in all directions from the Metro K line Downtown Inglewood Station (Downtown Inglewood Station). The Downtown TOD Plan planning and zoning area also extends approximately one-half mile in all directions from the Downtown Inglewood Station.

The Downtown TOD Plan includes concept plans, zoning, development standards and design guidelines, and an implementation action plan for consideration by applicants submitting any proposals for new construction or rehabilitation within the Plan area, as well as for consultation by City Staff when making recommendations for project approvals. The Downtown TOD Plan addresses architectural detail, signage, public art, and civic and cultural life. Further, the Downtown TOD Plan includes street tree concepts, including recommended street tree locations and species along roadways within the Downtown and Fairview Heights neighborhoods.

Section 2.8: Street Trees and Furniture<sup>7</sup> of the Downtown TOD Plan establishes that street trees are important elements of streetscapes and placemaking and provides guidelines on the character of trees placed within key areas of Downtown Inglewood. The Downtown TOD Plan recommends that Manchester Boulevard be lined with London Plane (*Platanus x acerifolia*) trees, or a similar species. This tree's ability to withstand air pollution, drought, as well as most diseases makes it a desirable street tree that would also provide some uniformity and connectivity for Downtown Inglewood. In the case of Florence Avenue, the Downtown TOD Plan calls for London Plane trees alternated with the California fan palm (*Washingtonia filifera*). Market Street should retain its existing street trees. The smaller arterial streets near Market Street may alternate between the Brisbane box (*Lophostemon confertus*), an evergreen tree, and the ginkgo (*Ginkgo biloba*), a deciduous tree. The Downtown TOD Plan states that these smaller street trees bring down the scale of the streets and create a sense of place throughout the streets of Downtown Inglewood.

<sup>6</sup> City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, November 1, 2016.

<sup>7</sup> City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, November 1, 2016, Section 2.8: Street Trees and Furniture, p. 19.

### **Hollywood Park Specific Plan**

The HPSP<sup>8</sup> establishes development standards and design guidelines for the 238-acre Hollywood Park site at the northeast corner of the Prairie Avenue and Century Boulevard intersection and provides an overview of existing infrastructure and necessary improvements related to the site, including measures for implementation measures of the plan. The site is currently under development and with SoFi Stadium constructed and operating and ongoing development of a 6,000-seat entertainment venue, parks, and retail, office, housing, entertainment, gaming, hotel, and civic uses.

The HPSP includes guidelines and standards for improvements in the public right-of-way within the plan area, which includes approximately 0.5 miles of street frontage along South Prairie Avenue. The HPSP also provides integrated and coordinated landscape design guidelines for new development along the perimeter of the Plan area with the objective of promoting land use compatibility, particularly along South Prairie Avenue.

The HPSP includes streetscape standards and provides integrated and coordinated landscape design guidelines for new development along the perimeter of the HPSP area to integrate it with the adjoining urban fabric, achieve a diverse urban forest, and assist in developing districts of distinctive and appropriate character.<sup>9</sup> Sidewalk widths are intended to provide walking routes and parkway widths are designed to provide sufficient area for urban tree growth. The HPSP guidelines and standard for streetscape include identity elements that would differentiate Hollywood Park from nearby developments through architectural features, landscaping (such as seasonal displays of color), graphic elements (such as signs or logos), special pedestrian or automobile paving, special night lighting effects, or other similar features.

The HPSP, Section 3.2.2: Streetscape, identifies selected street trees and the desired locations for their placement on internal roadways within the HPSP area as well as along major adjacent roadways, including Prairie Avenue, Century Boulevard, and the intersection corner of those roadways.<sup>10</sup> A majority of the tree species listed in the HPSP were selected from the City's approved tree list.<sup>11</sup> Selections were based upon recommendations from local arborists to create a palette of horticulturally successful, low maintenance, and climate-appropriate tree species. Alternative selections can be proposed, subject to City approval.

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8 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015. <https://www.cityofinglewood.org/DocumentCenter/View/1347/Hollywood-Park-Specific-Plan>.

9 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Section 3.2.2, Streetscape, p. 3-28.

10 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Section 3.2.2, Streetscape, Exhibit 3-25—Landscape Street Sections Map, p. 3-28.

11 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Section 3.2.2, Streetscape, Exhibit 3-25—Landscape Street Sections Map, p. 3-28.

The HPSP states that street trees along Prairie Avenue shall be substantial and continuous to achieve an appropriate scale for the street.<sup>12</sup> Along the portion of Prairie Avenue north of Hardy Street, large columnar evergreen trees such as Afghan pine (*Pinus eldarica*) or Canary Island pine (*Pinus canariensis*) would provide continuity with the retail development to the east and the cemetery to the north. This arrangement is intended to visually reduce the scale of the street and provide ample shade as visitors approach the HPSP site. Both Prairie Avenue south of Hardy Street and the northern side of Century Boulevard would be similarly lined with large evergreen trees such as camphor trees (*Cinnamomum camphora*) or Southern magnolia (*Magnolia grandiflora*). In addition, large canopy flowering trees and palms would mark key points near the HPSP site, including the retail corner and major entries, and maintain adequate street visibility. Selected species include Date palm (*Phoenix dactylifera*), Chanticleer Callery pear (*Pyrus calleryana*), and pink trumpet tree (*Tabebuia impetiginosa*). Palm trees at the northeastern corner of Prairie Avenue and Century Boulevard are intended to provide a thematic connection to Century Boulevard near the Los Angeles International Airport (LAX).

### **City Municipal Code**

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

### **Lighting and Signage**

Lighting and signage are also regulated by the Inglewood Municipal Code Chapter 12,<sup>13</sup> which defines minimum standards to safeguard life, health, property, and the public welfare by regulating and controlling the design, quality of materials, construction, size, height, location, and maintenance of all signs, sign structures, and other exterior advertising devices.

### **Tree Preservation**

The Municipal Code Tree Preservation<sup>14</sup> recognizes the importance of both native and nonnative trees within the City. Properly maintained trees increase property values, maintain the natural ecology, temper the effects of extreme temperatures, reduce runoff, prevent erosion of topsoil, and help create and maintain the identity and visual character of the City. Prior to removing or cutting a protected tree in the City, a permit must be approved by the City's Parks, Recreation, and Library Services Department.

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12 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Section 3.2.2, Streetscape, p. 3-29.

13 Inglewood, California, Municipal Code, Chapter 12, Article 23, Sign Regulation.

14 Inglewood, California, Municipal Code, Article 32, Section 12-110 (2012), Tree Preservation.

## City Design and Development Standards/Design Review Process

The City's Design and Development Standards,<sup>15</sup> supplements the Municipal Code with design standards and guidelines for development. The City has established a design review process and design standards to accomplish the following:

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

Additionally, The Municipal Code outlines the design review process required for development in the "D" Supplemental Design Review Zone.<sup>16</sup> This supplemental designation includes the TOD Mixed Use 1, TOD Mixed Use 2, and Historic Core zones.

### 4.1.5 EXISTING CONDITIONS

#### 4.1.5.1 Aesthetics and Views

##### *City of Inglewood*

The proposed Project is located entirely within the City, approximately 5.5 miles east of the Pacific Ocean, within a broad coastal plain surrounded by rising land to the south and north, and more-level terrain extending east. The City is a highly developed urban area containing moderately dense development along major corridors that consist of commercial, residential, and industrial uses. The street corridors provide the only long-range views available in the City, including limited views of Baldwin Hills to the north and other urban areas in and surrounding the City. Overall, the views within and surrounding the City are consistent with the views of a highly developed urban area.

No designated or otherwise identified scenic views or vistas are located within or visible from the City.<sup>17</sup> The City's General Plan states that no forest resources, wildlife, fisheries, shorelines, or agricultural land are present in the City,<sup>18</sup> nor does the General Plan designate any scenic vistas within the City or its vicinity.

<sup>15</sup> City of Inglewood, *Technical Background Report* (2006), Design and Development Standards, adopted January 30, 1979.

<sup>16</sup> City of Inglewood, Municipal Code Ch. 12, art. 14 (2010).

<sup>17</sup> Google Earth, 2020.

<sup>18</sup> City of Inglewood *General Plan*, "Conservation Element" (1997), 1.

Further, there are no designated or eligible State scenic highways within or adjacent to the Project area.<sup>19</sup> The nearest State scenic highway is Interstate 110 between mile post 25.7 and 31.9, which is located north of downtown Los Angeles and south of Interstate 210 in Pasadena. The closest portion of this scenic highway is approximately ten miles northeast of the Project boundary.

Additionally, the Project area is not near any designated wild or scenic rivers pursuant to the National Wild and Scenic Rivers System.<sup>20</sup> The nearest mountains, the Santa Monica Mountains, are more than 10 miles north of the Project boundary. No views of these mountains or of any other focal points or broad panoramic view corridors are available from public rights-of-way along the proposed alignment.

## Project Area

### Market Street Segment

The Market Street Segment begins at the intersection of Market Street and Florence Avenue and terminates at the intersection of Market Street and Manchester Boulevard. Aside from the shopping center and the vacant lot immediately south of Florence Avenue, this section of Market Street is composed primarily of low-rise commercial buildings and storefronts along a narrow two-lane roadway, with the exception of the former Fox Theater building, which includes structural components rising above most other nearby structures. Pedestrian sidewalks are landscaped with planters and street trees and street amenities such as benches, decorative streetlights, and decorative street posts. Landscaped medians divide the slightly curving two-lane roadway to define an intimate setting and slow traffic, with metered parking spots lining either side of the roadway to allow patrons to stop and shop at local businesses.

### Manchester Boulevard Segment

The Manchester Boulevard Segment begins at the intersection with Market Street and ends at the intersection with Prairie Avenue. Low-rise commercial buildings are located on both sides of Manchester Boulevard with storefronts making up the majority of the building facades along the roadway. Two parking lots approximately a block in length line the street adjacent to Hillcrest Boulevard on either side of the roadway, supporting two commercial shopping centers. Residential and church uses are also adjacent to Manchester Boulevard in smaller numbers, appearing as low-rise buildings along the roadway.

This segment of Manchester Boulevard includes two travel lanes in each direction with a median turn lane throughout the entire segment. Occasional concrete medians with street signs divide the lanes going in opposite directions and accommodate turn pockets. Metered parking spaces are located along the

<sup>19</sup> California Department of Transportation, California Scenic Highway Mapping System, Los Angeles County, [http://www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/), accessed August 2018.

<sup>20</sup> US Fish and Wildlife Service, *National Wild and Scenic Rivers System*, available at <https://www.rivers.gov/>, accessed August 31, 2018.

roadway. Sidewalks are provided on both sides of the street with palm trees, and streetlights on simple gray. Street signs are attached to the poles of the streetlights to help direct traffic with arrows and speed limits. Billboards containing large advertising displays are located on sides of the street. Limited landscaping is provided along this segment. Street benches and trash receptacles of simple design can be found at the bus stops along this segment.

#### **Prairie Avenue Segment**

The Prairie Avenue Segment begins at the intersection with Manchester Boulevard and ends at the intersection with Hardy Street. Low-rise commercial buildings, often with adjacent surface parking lots occupy the majority of the area to the west of Prairie Avenue. Located between Nutwood Street and Kelso Street is the Kelso Elementary School with single story structures that are simple in design. The playground and sports facility at the school is raised and located adjacent to Prairie Avenue. Single- and multifamily residential buildings, one- to two-stories in height, are also located along this segment of Prairie Avenue.

The Forum is located on the east side of Prairie Avenue between Manchester Boulevard and Pincay Drive. The Forum is a large circular building surrounded by an expansive surface parking lot, with vehicle entrances along Prairie Avenue. South of Pincay Drive is SoFi Stadium and a mixed-use community under development in the HPSP area. SoFi Stadium, which opened in September 2020, is located southeast of The Forum property and south of Pincay Drive. The SoFi stadium features a translucent roof which covers the stadium proper, the adjacent pedestrian plaza, and the attached performance venue. The stadium bowl contains open sides as part of its design. The majority of the HPSP site is currently under construction and consists of vacant graded areas enclosed by windscreen fences. Temporary construction lighting is visible throughout the site. Entrances to the construction site with security checkpoints are visible along the west side of Prairie Avenue.

Prairie Avenue includes three travel lane lanes in each direction, with a turn lane at the center of the roadway and additional right turn lanes in some locations Sidewalks are provided on both sides of Prairie Avenue with limited landscaping and street trees. Traffic signs are affixed on gray traffic poles and gray streetlight poles are located along the street. Multiple driveways are located along both sides of the street to allow for vehicles to enter parking lots and construction sites. A stretch of landscaped median extends from south of Arbor Vitae Street to just north of Hardy Street.

#### **4.1.5.2 Light and Glare**

The entire Project alignment is located in a highly urbanized area containing numerous light sources that generate varying degrees of light. Nighttime lighting is necessary to provide and maintain safe, secure, and attractive environments. However, these lights have the potential to produce spillover light and glare if

designed incorrectly. Light sources located close to light-sensitive receptors, such as residential units at nighttime, are most relevant for this analysis.

As described below, existing light sources in the Project area are typical of a highly developed area containing commercial and residential uses. The Project area does not contain any sources of light or glare that currently interfere with daytime or nighttime visibility. The existing levels of lighting are typical for a mix of commercial and residential uses located in an urban area, and there are no existing sources of light or glare that affect existing uses along these street segments.

#### **Market Street Segment**

Sources of existing ambient light along the Market Street Segment includes streetlights, vehicle headlights, traffic lights, and lighting from parking lots and commercial buildings. There are no existing light sensitive uses located along this segment of Market Street, such as residential dwellings and hotels/motels.

The facades of buildings along Market Street primarily include non-reflective materials that do not create glare. Existing nighttime sources of glare are primarily associated with vehicle headlights traveling throughout the area.

#### **Manchester Boulevard Segment**

Sources of nighttime illumination on Manchester Boulevard consist of light sources commonly found in developed urban areas, including streetlights, vehicle headlights, traffic lights, and lighting from adjacent buildings. This segment includes residential homes on the north side of the street between Manchester Drive and Osage Avenue which are currently exposed to these sources of light.

The facades of buildings along this segment primarily include non-reflective materials that do not contribute to glare. Existing nighttime sources of glare are primarily associated with vehicle headlights traveling on Manchester Boulevard and adjacent streets.

#### **Prairie Avenue Segment**

Nighttime lighting on Prairie Avenue consists of light sources commonly found in developed urban areas, including streetlights, vehicle headlights, traffic lights, lighting from buildings located along the street and lighting associated with billboards located along this segment of Prairie Avenue. Residential and motel uses located west of Prairie Avenue are currently exposed to these light sources.

East of Prairie Avenue, nighttime lighting associated with the surface parking lots surrounding the Forum and HPSP are also visible from the residential and motel uses west along Prairie Avenue. The parking lot lights at the Forum and HPSP are similar in intensity to the adjacent streetlights. Although located

throughout the large surface parking lots and along the perimeter, these lights are shielded and directed and result in limited light spillover onto these light-sensitive uses.

The facades of buildings along this segment primarily consist of non-reflective materials that do not contribute to glare conditions. Existing nighttime sources of glare are primarily associated with vehicle headlights traveling on Prairie Boulevard and adjacent streets.

#### 4.1.5.3 Adjusted Baseline Conditions

The Adjusted Baseline Environmental Setting as described in **Section 4.0: Environmental Impact Analysis, 4.0-5: Adjusted Baseline** is considered in this analysis. The residential, office, retail, and entertainment uses associated with the Adjusted Baseline projects would result in changes to the visual conditions east of Prairie Avenue within the HPSP area.

The Champion Park neighborhood planned between Arbor Vitae Street and Hardy Street west of Prairie Avenue would accommodate a range of housing types with a residential gateway constructed at the intersection of Arbor Vitae Street and Prairie Avenue. Street trees along this segment of Prairie Avenue would be primarily Afghan Pine (*Pinus eldarica*) planted along the sidewalks and the roadway median.<sup>21</sup>

At the intersection of Hardy Street and Prairie Avenue a primary point to the HPSP community is planned as a gateway consisting of substantial structures and signage to introduce patrons to the retail and entertainment located west of Prairie Avenue from Hardy Street to Century Boulevard. Street trees south of Hardy Street would be Camphor (*Cinnamomum camphora*) trees. Street trees on the east side of Prairie Avenue would be substantial in stature, ranging from 40 feet to 50 feet in height and create a buffer between this area and Prairie Avenue.<sup>22</sup>

All exterior lighting at the HPSP would be directed onto the driveways, walkways, and parking areas and shielded to minimize glare and light spill onto adjacent properties and streets. In addition to lighting on vertical structures, specialty lighting would be used to highlight architectural elements, landscaping, and building tenant and project signage. Security and safety lighting would also be provided as necessary in parking areas, service passages, and common areas. All lighting would be directed toward the ground wherever feasible or screened to minimize illuminating surrounding areas and minimize glare and interference with vehicular traffic. Additionally, building facades and windows would be constructed of non-reflective materials to avoid glare impacts on surrounding residential properties and streets. While

<sup>21</sup> City of Inglewood. Hollywood Park Specific Plan. Adopted July 8, 2009. Amended September 2014 and February 2015.

<sup>22</sup> City of Inglewood. Hollywood Park Specific Plan. Adopted July 8, 2009. Amended September 2014 and February 2015.

the new buildings and site improvements in the HPSP area would substantially change the visual environment east of Prairie Avenue, these changes would not conflict with nearby uses.<sup>23</sup>

#### 4.1.6 THRESHOLDS OF SIGNIFICANCE

Criteria outlined in CEQA Guidelines were used to determine the level of significance of aesthetics impacts. The Project would have a significant impact in relation to aesthetics if it would result in the following

<b>Threshold AES-1a</b>	<b>Substantially degrade the existing visual character or quality of public views of the site and its surroundings.</b>
<b>Threshold AES-1b</b>	<b>Be inconsistent with applicable zoning and planning regulations governing scenic quality.</b>
<b>Threshold AES-2</b>	<b>Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.</b>

#### 4.1.7 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

The project includes the ITC Design Standards and Guidelines (Design Guidelines) and Construction Commitment Program (CCP) as described in **Section 3.0: Project Description**. The CCP addresses temporary effects during construction of the Project. The Design Guidelines describe the design standards and features of the proposed Project.

##### 4.1.7.1 Project Design Features

The following measures in the Design Guidelines and CCP address the potential effects on visual character of the area along the proposed alignment, and how implementation of the proposed Project would affect this visual character:

##### PDF AES-1 Construction (CCP)

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 will be limited to the amount necessary to safely perform the required work and will 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

<sup>23</sup> City of Inglewood. Final Environmental Impact Report. I. Introduction Executive Summary. <https://www.cityofinglewood.org/DocumentCenter/View/125/I-Introduction-Executive-Summary-PDF>. Accessed November 30, 2020.

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.

#### **PDF AES-2 Tree Replacement (CCP)**

A Tree Removal and Replacement Plan will 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 will 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 will 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.

#### **PDF AES-3 Lighting (Design Standards and Guidelines)**

##### Station Design

- Station canopies will have indirect accent lighting.
- Lighting will clearly highlight pedestrian paths including those to stairs, escalators, and elevators.
- Accent and functional lighting will be strategically placed to minimize spillover.
- Accent and functional lighting controls will 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 will complement station lighting design.
- Light fixtures will be concealed or minimally visible.
- Accent and functional lighting will be strategically placed to minimize spillover.
- Code required lighting along the guideway will be designed to minimize visibility from the ground level.
- Street lighting will 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 will be placed to minimize spillover.
- Building entrances will be well lit.
- Lighting will 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 will be well lit with particular attention paid to the comfort and safety of the public.

##### Elevated Passenger Walkways

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

**PDF AES-4 Tree Placement (Design Standards and Guidelines)**

- An arborist report surveying the condition and extents of all existing trees in the Project area will 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) will remain, where feasible.
- An Approved Plant Palette based on the City’s approved street tree list will be used as a basis for all sections of new trees.
- The quantity and species of existing trees removed by the ITC Project will be replaced in accordance with the City’s current landscape guidelines.
- Protected species in the Inglewood Municipal Code, Tree Preservation will remain.
- City of Inglewood guidelines for tree spacing will be followed, considering species of trees and the desired canopy coverage.
- Trees will be planted on both sides of the roadway where feasible.
- Trees will be positioned at regular intervals relative to the guideway column supports to create a consistent rhythm.
- On Market Street, trees will be planted at a rhythm and scale to create a continuous visual canopy over the pedestrian realm, where feasible.
- On Manchester Boulevard, trees will 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 will continue the stately rhythm from the Inglewood Cemetery north of Manchester Boulevard. Trees on the west side will be spaced to match the rhythm of the east side and the guideway support structure to the extent feasible.

**PDF AES-5 Signage (Design Standards and Guidelines)**

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

**PDF CUL-1 Historic Resources (Design Standards and Guidelines)**

The final Project design must consider design variables (elevation of guideway, width of guideway, distance of the guideway from the resources, and the dimensions, placement, and spacing of support columns) and resource variables (building’s height, scale, number of street-facing facades, width of primary façade, front

setback, project elements overhanging the sidewalk, and viewpoints from which the resource can best be discerned in its entirety). The final Project design shall ensure minimal impacts to the setting of historical resources, and little or no visual obstruction of the resource’s street-facing façades from the optimal viewpoints. In order to meet these performance-based standards, the following Project Design Features shall be incorporated into the final Project design:

- The guideway’s elevation and distance from the façade of the historical resource will be sufficient for the guideway to visually clear the top of the historical resources’ street-facing façade(s) when viewed from the optimal viewpoints. The final Project design is expected to achieve no visual obstruction of any of the identified historical resources from the guideway.
- At the former Fox Theatre, and for 100 feet on either side of the resource, the guideway elevation (measured from the ground plane to the underside of the guideway structure) will be a minimum of 52 feet from grade in order to achieve unobstructed views of this resource, including its monumental sign pylon.
- The dimensions, placement, and spacing of the guideway support columns will be such that the obstruction of views of the historical resources’ street-facing façade(s) when viewed from the optimal viewpoints will be minimized. For five of the identified historical resources—Holy Faith Episcopal Church, former United Bank of California (now Broadway Federal Bank), former Fox Theatre, Professional Building, and Inglewood Park Cemetery—the final Project design is expected to completely avoid visual obstructions from support columns.
- For five of the historical resources—the former Bank of Inglewood, former J.C. Penney, Bank of America, the Forum, and Lighthouse McCormick Mortuary Mortuary—views that are completely unobstructed by support columns are not necessary for the resource to convey its significance. A small portion of the resources’ primary façades will be intermittently obscured depending on the position of the viewer. However, due to the scale and/or setback of these resources, their primary façades will remain readily discernable.

**Impact AES-1 a: Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings?**

Alterations to visual quality and character can often be perceived as subjective. To better understand the integration of the proposed Project into the existing environment, descriptions of the Design Guidelines, Construction Commitment Program (CCP), and the Transportation Corridor Overlay Zone (TC Overlay Zone) proposed as part of the Project are provided below along with photographic visual simulations of the Project.

**Construction**

The proposed Project would include the construction of the ATS system including the stations, guideways, MSF and two PDS substations. A new Vons grocery store would also be built on the MSF site prior to construction of the MSF and other project components on this site. In addition, one of the existing travel

lanes on Prairie Avenue will be shifted to the east into the existing setback area along Prairie Avenue by no more than thirty (30) feet to maintain the current roadway capacity.

During construction, exposed dirt, construction equipment, and demolition debris would be visible but temporary. Construction would occur in eight phases over approximately four years, between 2024 and 2027, with the phases likely to overlap along the segments of streets along the Project alignment to provide the most efficient construction schedule. Phasing the construction activities in this manner would reduce the duration of exposure by each segment. For detailed construction phasing timeframes and construction activities occurring during each phase, please refer to **Section 3.0**.

In order to lessen the temporary aesthetic impacts associated with construction of the Project, the CCP identifies practices to be implemented during construction. **Project Design Feature (PDF) AES-1** incorporates the visual resources program as defined in the CCP. This program addresses nighttime lighting, removing erosion control devices as soon as stabilized, and locating stockpile areas in less visibly sensitive areas. Specifically, **PDF AES-1** addresses visually obtrusive erosion control devices such as silt fences, plastic ground cover, and straw bales and removal of these elements as soon as the area is stabilized. Stockpile areas would also be located in areas with the least visibility with minimal disruption near residential neighborhoods and would be pre-approved by the City. Implementation of **PDF AES-1** would reduce unsightly views of construction activities and, for this reason, visual impacts during construction would be less than significant.

### **Operation**

After construction, the components of the proposed ATS system that would change the existing visual character along the proposed alignment would include the ATS guideway; stations including vertical circulation elements, elevated passenger walkways, parking and Pick-up/Drop-off sites; the MSF; two PDS substations proposed on the MSF site and Prairie Avenue/Hardy Street Station site; and the new Vons supermarket at the MSF site. The trains moving on the elevated ATS guideway, station structures, and associated signage would be visible from adjacent land uses and the surrounding neighborhoods. The shift of one of the existing travel lanes on Prairie Avenue by no more than thirty (30) feet into the existing setback area would also affect the existing visual character of this portion of Prairie Avenue.

The Project will ensure replacement of existing trees and will also create new landscaping. **PDF AES-2** incorporates the tree removal and replacement plan as defined in the CCP which addresses removal and replacement of trees affected by construction of the Project. **PDF AES-4** guides tree placement as called for in the Design Standards and Guidelines.

Tree removal during construction would be avoided to the extent feasible as defined in **PDF AES-2**. This Project Design Feature requires a tree removal and replacement plan to be prepared that would ensure any landscaping removed during construction is returned to its original condition where appropriate. Any

trees requiring removal would be replaced with the same species and planted in the same location as the tree being removed if feasible. If trees cannot be replaced at the same location with the same type of tree, the City's Public Works Department would designate an alternative location, type, and/or size to replace the original tree. All trees removed would also be replaced in a timely manner as long as the replacement does not conflict with any future construction activities or within six months of the completion of construction around the removal site. Lastly, post-planting maintenance of the trees would be required for a period of three years from the date of the planting and the trees and landscaping would have a warranty period of at least one year. The City would conduct an inspection of all replacement trees and landscaping for general health as a condition of final acceptance by the City. These proposed tree protection measures would ensure any tree replacement would be properly implemented and the proposed Project area maintains a high level of aesthetic quality.

**PDF AES-4** would require tree placement to follow the Design Standards and Guidelines for tree spacing and to consider the species of the trees and desired canopy coverage. Trees would be planted on both sides of the roadway as feasible. An arborist report surveying the condition and extents of all existing trees in the Project area will 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) will remain, where feasible and an Approved Plant Palette based on the City's approved street tree list will be used as a basis for all sections of new trees. The quantity and species of existing trees removed by the ITC Project will be replaced in accordance with the City's current landscape guidelines and protected species in the Inglewood Municipal Code, Tree Preservation will remain. Trees will be placed at regular intervals relative to the ATS guideway column supports to create a consistent rhythm. These proposed tree placement measures would ensure trees are properly placed and the proposed Project area maintains a high level of aesthetic quality.

The Project will address additional sources of light. **PDF AES-3** includes the lighting design standards in the Design Standards and Guidelines. These guidelines address lighting for station design, guideway and support structures, the MSF, and elevated passenger walkways. Accent lighting at the stations would be indirect and all lighting would be strategically placed to minimize light spillover.

The Project will also include a comprehensive wayfinding and signage program. **PDF AES-5** incorporates the design standards from the Design Standards and Guidelines. This program will apply to City of Inglewood wayfinding, ITC station wayfinding, advertising, and existing signs requiring relocation. Project signs will be designed and located to provide clear information and direction for both pedestrians and transit passengers. As described in **PDF AES-5**, any existing signage along the entire ITC alignment displaced by the Project will be replaced with signs that meet the original intent and function of these signs.

To illustrate the effect of the proposed Project, visual simulations showing the Project from the public viewpoints on Florence Avenue, Market Street, Manchester Boulevard, and Prairie Avenue as identified in **Figure 4.1-1: Viewpoint Location Map** are provided below.

#### **View 1–Florence Avenue at Locust Street**

The view in **Figure 4.1-2: View 1 – Florence Avenue at Locust Street** shows the proposed ATS guideway and the Market Street/Florence Avenue station as it would be viewed looking southwest from the public right-of-way near Florence Avenue and Locust Street. The top of the station structure, the elevated passenger walkway connecting the Market Street/Florence Avenue station to the Metro K line station, support columns and portions of the guideway would be visible from this location.

#### **View 2–Market Street at Florence Avenue**

The view in **Figure 4.1-3: View 2 – Market Street at Florence Avenue** shows the proposed Project guideway as it would be viewed from the public right-of-way near Florence Avenue and Market Street. Portions of the Market Street/Florence Avenue station, associated pedestrian stairways, surface parking and guideway would be visible as the guideway enters the public right-of-way on Market Street and heads south.

Under existing conditions, the ongoing construction of a mixed-use project on the west side of Market Street north of Regent is visible, along with portions of the existing commercial center located on the west side of Market Street. Views along Florence Avenue and Market Street currently consist of low-rise commercial development, surface parking, signs, mid-rise office buildings, and the ongoing construction of the Metro K line. Continuing south along Market Street, views include existing low-rise commercial development with street parking and wide sidewalks.

#### **View 3–Manchester Boulevard at Market Street**

The view in **Figure 4.1-4: View 3 – Manchester Boulevard at Market Street** shows the proposed guideway as it would be viewed from the public right-of-way just west of Manchester Boulevard and Market Street. The guideway, straddle bent columns and single support columns centered above the proposed median would be visible looking east toward Manchester Boulevard and north toward Market Street as the alignment crosses the intersection and turns from Market Street onto Manchester Boulevard.

Existing commercial development along Manchester Boulevard on both the north and south side of the street is visible. Views along Manchester Boulevard toward Prairie Avenue currently consist of low-rise commercial and residential development, as well as street parking.

#### **View 4–Manchester Boulevard at Spruce Avenue**

The view in **Figure 4.1-5: View 4 – Manchester Boulevard at Spruce Avenue** shows the proposed elevated MSF and the support columns for the MSF and a portion of the guideway in the foreground of the view with the new Vons store visible in the background under the MSF when viewed from public right-of-way near Manchester Boulevard and Spruce Avenue looking southwest.

#### **View 5–Prairie Avenue north of Manchester Boulevard**

The view in **Figure 4.1-6: View 5 – Prairie Avenue north of Manchester Boulevard** shows the proposed guideway as seen from public right-of-way near just north of the intersection of Prairie Avenue and Manchester Boulevard. The views show the Forum on the east side of Prairie Avenue and the Prairie Avenue/Manchester Boulevard Station on the west side of Prairie Avenue. The guideway would be visible as it heads south on Prairie Avenue from the Prairie Avenue/Manchester Boulevard Station. Up to three straddle bent columns supporting a switch zone for the ATS trains immediately south of the station would also be visible from this location.

Views along Prairie Avenue include the Forum monument signage, and the ongoing construction within the HPSP entertainment district, surrounded by largely vacant land.

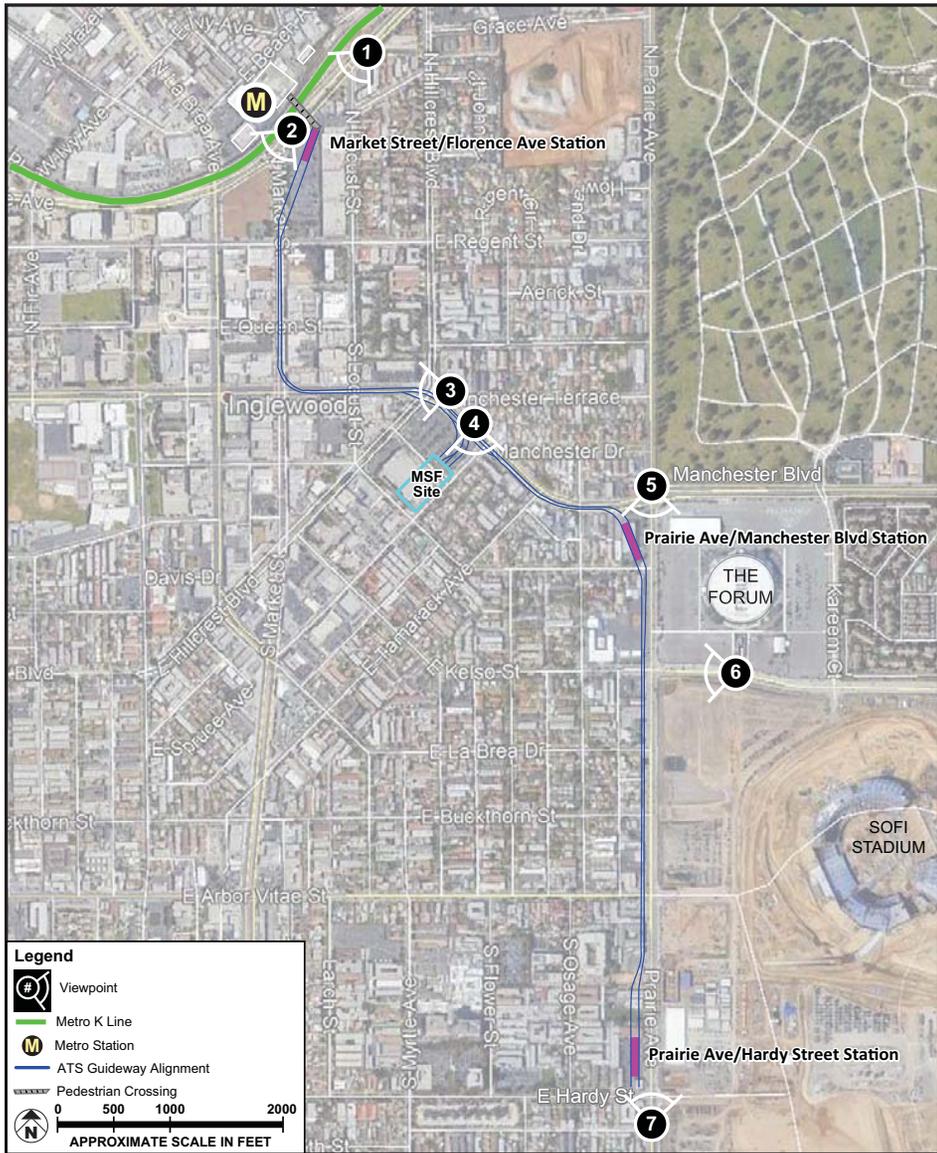
#### **View 6–Prairie Avenue at Pincay Drive**

The view in **Figure 4.1-7: View 6 – Prairie Avenue at Pincay Drive** shows guideway viewed from the public right-of-way along Pincay Drive near its intersection with Prairie Avenue looking west. The guideway extends both north and south along Prairie Avenue.

The view includes the ongoing construction in the HPSP area to the south of Pincay Drive, as well as the Forum to the north of the roadway. Future development in the HPSP area as described above in *Section 4.1.5.3: Adjusted Baseline* would also change the visual character of a portion of Prairie Avenue described in this view. All future development in the HPSP area would be required to be consistent with the design guidelines in the HPSP.

#### **View 7–Prairie Avenue at 97<sup>th</sup> Street**

The view in **Figure 4.1-8: View 7 – Prairie Avenue at 97<sup>th</sup> Street** shows the Prairie Avenue/Hardy Street station viewed from public right-of-way near Prairie Avenue and 97<sup>th</sup> Street looking north. The station would be located on the northwest corner of Prairie Avenue and Hardy Street. The proposed elevated passenger walkway across Prairie Avenue is also visible. Future development in the HPSP area as described above in *Section 4.1.5.3: Adjusted Baseline* would also change the visual character of a portion of Prairie Avenue described in this view. All future development in the HPSP area would be required to be consistent with the design guidelines in the HPSP.



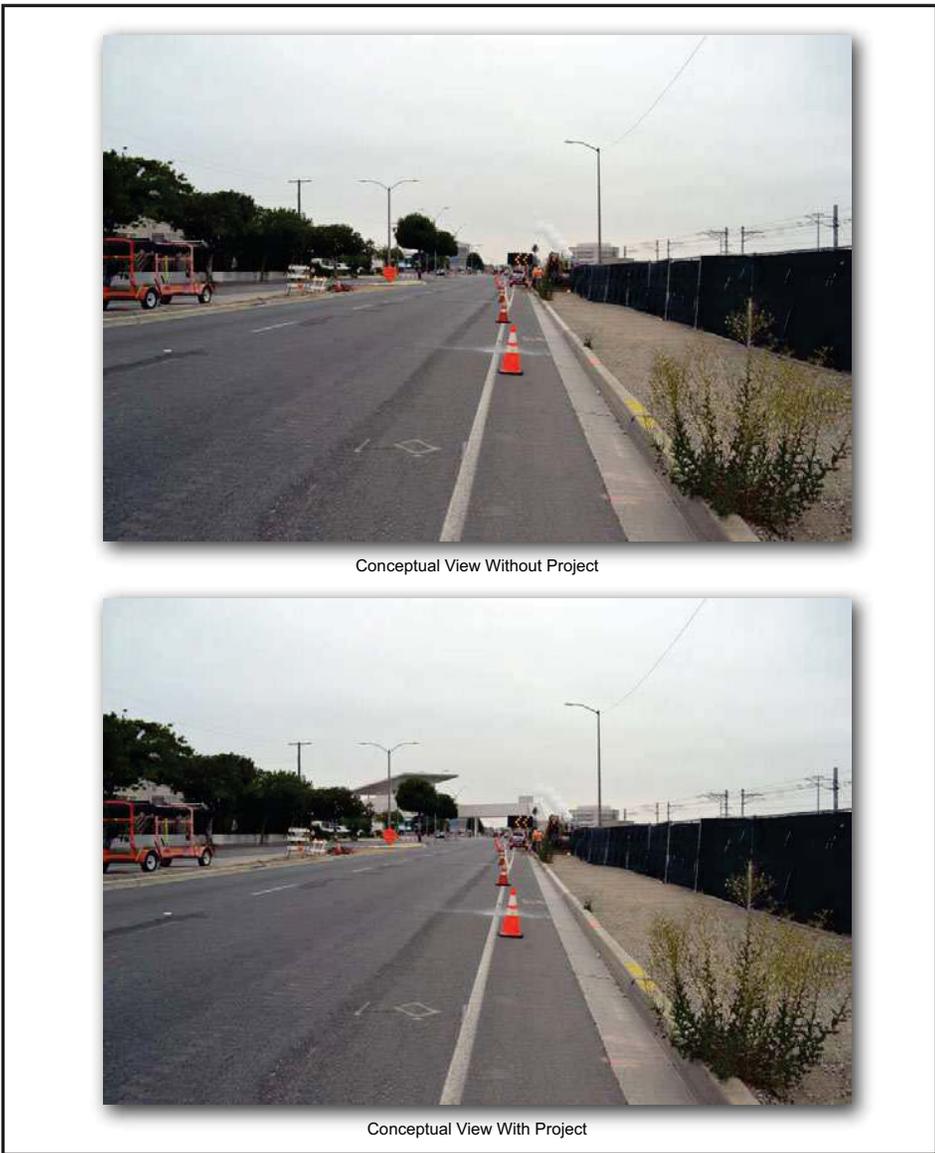
SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021

Illustrative and subject to adjustments as part of finalization during final design

FIGURE 4.1-1

Viewpoint Location Map

251-004-21



SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021

FIGURE 4.1-2

View 1 – Florence Avenue at Locust Street

251-004-21



Conceptual View Without Project



Conceptual View With Project

SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021

FIGURE 4.1-3



251-004-21

View 2 – Market Street at Florence Avenue



Conceptual View Without Project



Conceptual View With Project

SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021

FIGURE 4.1-4



251-004-21

View 3 – Manchester Boulevard at Market Street



Conceptual View Without Project



Conceptual View With Project

SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021

FIGURE 4.1-5



View 4 – Manchester Boulevard at Spruce Avenue

251-004-21



Conceptual View Without Project



Conceptual View With Project

SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021

FIGURE 4.1-6



View 5 – Prairie Avenue north of Manchester Boulevard

251-004-21



Conceptual View Without Project



Conceptual View With Project

SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021

FIGURE 4.1-7



251-004-21

View 6 – Prairie Avenue at Pincay Drive



Conceptual View Without Project



Conceptual View With Project

SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021

FIGURE 4.1-8



251-004-21

View 7 – Prairie Avenue at 97th Street

Analysis of the change in visual character is described below for each segment of the proposed ATS alignment. The potential changes in visual character for individual project components are analyzed for each segment. Specifically, the potential for the components of the Project, including the guideway, stations, elevated passenger walkways and associated vertical circulation elements (i.e., elevators and stairs), the MSF and street improvements, including the shift of one of the existing travel lanes on Prairie Avenue up to thirty (30) feet into the existing setback area along Prairie Avenue, to adversely affect the existing visual character of the areas along the proposed alignment are addressed. **Table 4.1-1: ITC Project Component Locations and Sizes** describes ITC Project components and their respective location and size.

**Table 4.1-1  
ITC Project Component Locations and Sizes (Conceptual)**

Project Component	General Location	Approximate Size
<b>Guideway</b>	<ul style="list-style-type: none"> <li>Located predominantly within the existing public right-of-way of Market Street, Manchester Boulevard, and Prairie Avenue</li> <li>The Prairie Avenue/Manchester Boulevard and Prairie Avenue/Hardy Street Stations are proposed to be located on private property located west of Prairie Avenue proposed for acquisition as part of the Project.</li> </ul>	<ul style="list-style-type: none"> <li>Approximately 1.6 miles dual lane, end to end</li> <li>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</li> <li>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.</li> </ul>
<b>Stations</b>		
<i>Market Street / Florence Avenue Station</i>	<ul style="list-style-type: none"> <li>Located on private property (to be acquired by the City) at the southeast corner of Market Street/Florence Avenue</li> </ul>	<ul style="list-style-type: none"> <li>Up to ~80 feet in height measured from existing grade to top of station canopy</li> <li>~75 feet wide (station structure and guideway only; not including vertical circulation)</li> <li>~200-foot long platform for train berthing</li> <li>~420-foot long mezzanine level for back of house and circulation</li> </ul>
<i>Prairie Avenue / Manchester Boulevard Station</i>	<ul style="list-style-type: none"> <li>Located on private property (to be acquired by the City) at the southwest corner of Prairie Avenue/Manchester Boulevard</li> </ul>	<ul style="list-style-type: none"> <li>Up to ~80 feet in height measured from existing grade to top of station canopy</li> <li>~75 feet wide (station structure and guideway only; not including vertical circulation)</li> <li>~200-foot long platform for train berthing</li> <li>~360-foot long mezzanine level for back of house and circulation</li> </ul>

Project Component	General Location	Approximate Size
<i>Prairie Avenue / Hardy Street Station</i>	<ul style="list-style-type: none"> <li>Located on private property (to be acquired by the City) at the northwest corner of Prairie Avenue/Hardy Street</li> </ul>	<ul style="list-style-type: none"> <li>Up to ~80 feet in height measured from existing grade to top of station canopy</li> <li>~75-foot wide (station structure and guideway only, not including vertical circulation)</li> <li>~200-foot long platform for train berthing</li> <li>~340-foot long mezzanine level for back of house and circulation</li> </ul>
<b>Vertical Circulation Elements</b>	<ul style="list-style-type: none"> <li>Located at each station within the public right-of-way, easements, or private property to be acquired</li> <li>Locations will depend on station specific requirements to connect to existing sidewalk/passenger walkways.</li> </ul>	<ul style="list-style-type: none"> <li>Vertical circulation elements will exist at each station to provide access from the platform level to the mezzanine level and ground level</li> </ul>
<b>Elevated Passenger Walkways</b>	<ul style="list-style-type: none"> <li>Location 1: above Florence Avenue connecting the Market Street/Florence Avenue Station to the Metro Crenshaw/LAX Line Downtown Inglewood Station.</li> <li>Location 2: above Prairie Avenue from Prairie/Manchester station to the Forum site</li> <li>Location 3: above Prairie Avenue from Prairie/Hardy station to the Hollywood Park site</li> <li>Specific locations will be determined at time of design and coordinated with stakeholders</li> </ul>	<ul style="list-style-type: none"> <li>Height will be up to ~65 feet in height measured from existing grade to top of structure</li> <li>~30 feet wide maximum for passenger walkway</li> <li>~280 feet long for location 1 and ~160 feet long for locations 2 and 3</li> <li>Minimum vertical clearance of 10 feet within the walkway interior</li> </ul>
<b>Maintenance and Storage Facility (MSF)</b>	<ul style="list-style-type: none"> <li>Primarily located on private property to be acquired by the City as part of the Project with potential for portions of the MSF to be located within an easement at 500 E. Manchester Boulevard</li> </ul>	<ul style="list-style-type: none"> <li>~75,000 SF building area</li> <li>Up to ~75 feet in height measured from existing grade to top of roof</li> <li>Surface parking area under building containing 50 spaces for employees and visitors</li> </ul>
<b>Power Distribution System (PDS) Substation</b>	<ul style="list-style-type: none"> <li>Two PDS substations; one located at the MSF site and</li> </ul>	<ul style="list-style-type: none"> <li>~30 feet wide x ~100 feet long</li> <li>Up to ~20 feet clearance height measured from floor to ceiling</li> <li>If located below grade, an additional space of ~30 feet wide x ~30 feet long for vertical circulation</li> </ul>

Project Component	General Location	Approximate Size
	the second at the Prairie/Hardy Station .	<ul style="list-style-type: none"> <li>~20 feet wide x ~40 feet long additional space for auxiliary equipment such as a backup generator, if necessary</li> </ul>
	<ul style="list-style-type: none"> <li>Specific locations within each site will be determined during the design phase</li> </ul>	
<b>Roadway Improvements</b>	<ul style="list-style-type: none"> <li>Market Street, Manchester Boulevard and Prairie Avenue</li> </ul>	<ul style="list-style-type: none"> <li>New roadway striping, lane re-configurations, partial relocation, on-street parking adjustments, new sidewalks, lighting improvements, traffic signal adjustments, landscaping, and streetscape</li> </ul>
<b>Pick-Up/Drop-Off Areas, Surface Parking Lots and Staging Areas During Construction</b>	<ul style="list-style-type: none"> <li>Market Street/Florence Avenue Station site</li> <li>150 S. Market Street</li> <li>Prairie Avenue/Hardy Street Station</li> </ul>	<p>Surface level parking at each site:</p> <ul style="list-style-type: none"> <li>~650 spaces at Market Street/Florence Station</li> <li>~50 spaces at 150 S. Market Street</li> <li>~100 spaces at Prairie/Hardy Station</li> </ul> <p>Pick-Up/Drop-Off Area:</p> <ul style="list-style-type: none"> <li>Market Street/Florence Avenue Station site on Locust Street south of Florence Avenue, and Regent Street between Locust Street and Market Street</li> <li>Prairie/Hardy Street Station within the station site</li> </ul>

## **Market Street Segment**

### **Market Street/Florence Avenue Station**

The Market Street/Florence Avenue Station would be a focal point of the proposed Project, connecting the ATS system to the Metro K line Downtown Inglewood Station. The Market Street/Florence Avenue station would replace the existing commercial center at 300 E. Florence Avenue. The station would be designed in conformance with the Design Standards and Guidelines as a sleek and horizontal station design with a distinctive, modern style. The lightly colored canopy over the platform would be the dominant architectural feature, providing shade and protection from inclement weather while allowing for natural ventilation and daylight. Vertical circulation including escalators, stairs, and elevators would be included as part of the station. The elevators and associated enclosures would be constructed using transparent glass to contribute to a modern exterior design while allowing unobstructed views from all sides. For approximate station dimensions, please refer to **Table 4.1-1**.

The station exterior would be composed of exposed concrete with a light colored canopy material. The exposed exterior of the structure would be made with materials resistant to graffiti and vandalism to reduce the potential for unsightly defaced properties. The neutral tone of the station would allow it to

blend in with its surroundings. The platform and mezzanine guardrails would be as transparent as possible to enhance the integration of the station with the surrounding environment. The Design Standards and Guidelines call for the final design of this station to reflect the unique character of downtown Inglewood to further integrate the structure into the existing public realm along Market Street.

A drop-off/pick-up area on Locust Avenue and Regent Street to facilitate multiple travel modes would be located adjacent to this station along with a surface parking lot to accommodate ATS riders and consolidate parking while reducing the need to park on adjacent streets and at nearby businesses. Consistent with the Design Standards and Guidelines new landscaping and site improvements to provide shade and decorative separation of parking spaces would be provided. The proposed surface parking lot would improve the visual character of the existing surface parking lot at the same location.

### **Elevated Passenger Walkway**

An elevated passenger walkway would connect the Market Street/Florence Avenue Station with the Metro K Line Downtown Inglewood Station. This passenger connection would be elevated and span over Florence Avenue and would be visually integrated with the design of the Market Street/Florence Avenue Station and Metro K Line Downtown Inglewood Station. This walkway would be simple in design and form to deliver functionality and protect passengers from inclement weather. The exterior of the walkway, elevators and associated enclosures would be constructed with transparent material to the extent feasible to provide a contemporary and appealing aesthetic while providing as much natural daylight and unobstructed views for pedestrians. Neutral tones would be used in areas of the structure where transparent material cannot be used to further integrate the elevated passenger walkway with the surrounding structures. Visually unobstructive barriers would be integrated into the walkway design to ensure both pedestrian and roadway safety.

### **ATS Guideway**

The guideway in this segment would exit the existing commercial center site at the intersection of Market Street and Regent Street and continue south above the Market Street right of way until Manchester Boulevard where the guideway would turn east. The guideway would be supported by single columns until it reaches Manchester Boulevard. The columns would be primarily located in the existing median area along Market Street between Regent Street to Manchester Boulevard.

**PDF CUL-1** would be incorporated into the project to minimize impacts to the historic buildings along Market Street as called for in the Design Standards and Guidelines, discussed further below.

The design of the guideway would be streamlined and horizontal in expression. As required by **PDF CUL-1**, columns would be positioned in the middle of the roadway with as much space in between columns as is feasible, away from storefronts and adjacent buildings, to support the guideway structure. The drawings in Appendix D: Conceptual Project Design of the Historical Resources Technical Report (**Appendix I.2**) show the relationship of these components of the Project to individual historic resources located along the proposed alignment.

Where possible, the dual-lane guideway would be narrowed and configured to facilitate the use of single columns to support the structure to minimize the visual mass of the guideway. With the revised Project design, the amount of the guideway that would be supported by single columns has been maximized along Market Street, Manchester Boulevard, and Prairie Avenue. Specifically, shifting the guideway to the west side or Prairie Avenue allows for the guideway between the Prairie Avenue/Manchester Boulevard and Prairie Avenue/Hardy Street stations to be supported by single columns to minimize changes to existing visual character of Prairie Avenue. The conceptual guideway alignment plans and column placements are shown in **Appendix E: ITC Operating Systems**. The guideway would be constructed of exposed neutral colored concrete or similar with tapered edges to reduce perceived massing. Guideway transitions at crossovers would be smooth and rounded with all conduits, guideway equipment, walkways, drainage systems, and other utilities concealed from the ground view. Overall, the guideway would be simple, clean, respectful of the surrounding environment and complimentary to the station designs.

#### Historic Resources and Character

Five historical resources were identified on Market Street along the proposed alignment for the ATS guideway:

- Former Bank of Inglewood (100 Market Street);
- Former Fox Theater (115 Market Street);
- Former United Bank of California (158-170 Market Street);
- Former J.C. Penney (129-139 Market Street); and
- Professional Building (149-155 Market Street)

The elevation and distance of the guideway from the façade of these historical buildings on Market Street will be sufficient for the guideway to visually clear the top of the façades of these buildings when viewed from Market Street as required by **PDF CUL-1**. At the Fox Theater, and for 100 feet on either side of the Fox Theater building, the guideway elevation will be a minimum of 52 feet from grade in order to maintain unobstructed views of pylon sign and front façade of the building. The guideway will have a width of approximately 32 feet and will be supported by single round columns in the median of Market Street with

a diameter of 8 feet. The elevation and distance of the guideway from the façades of these historic buildings will be sufficient for the guideway to visually clear the top of the historical resources' street-facing façade. When viewed from the optimal viewpoints. The dimensions, placement, and spacing of the guideway support columns will also avoid or minimize obstructions of the view of the façades of these historic buildings along Market Street. The final Project design is expected to achieve no visual obstruction of any of the identified historical resources along Market Street from the guideway.

The scale, massing, and overall composition of these historic buildings would remain readily discernable to the viewer despite some interruption of views by the proposed Project and would still convey their historic significance as historic resources. As such, the project would not substantially degrade the existing visual character of these six historic resources and impacts would be less than significant.

#### Streetscape

The Design Standards and Guidelines include public realm guidelines addressing landscape and the interface of the Project with the existing streets. Under the Design Standards and Guidelines, this segment of the streetscape is designed to complement standards and guidelines outlined within the *Downtown TOD Plan*<sup>24</sup> while accommodating Project needs. Specifically, the existing streetscape design and aesthetics as described in the existing conditions would be maintained to the extent feasible while providing necessary upgrades such as ADA-compliant ramps. The sidewalks would be designed to be as wide as possible to allow for comfortable pedestrian travel. Plazas with street furniture would provide places to gather and encourage social interaction. The design of the street furniture would complement the overall design of the proposed streetscape improvements. 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. Street trees and landscaping would be provided where possible to provide shade and create a walkable pedestrian pathway. Trees would be arranged to create a continuous canopy over the pedestrian realm where feasible. Trees would be planted on both sides of the roadway where feasible and would be positioned relative to the guideway columns to create a consistent visual rhythm. Street trees and new landscaping would be planted within the median below the ATS guideway along Market Street to enhance the aesthetic quality of the roadway. Street furniture and street tree concepts would be consistent with the Design Standards and Guidelines, which include consideration of the street furniture and street tree concepts set forth in the *Downtown TOD Plan*, Section 2.8, Street Trees and Furniture. These streetscape improvements would enhance the visual character of Market Street in Downtown Inglewood and assist in visually integrating the guideway into Market Street.

<sup>24</sup> City of Inglewood. New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines. Adopted November 1<sup>st</sup>, 2016. <http://inglewood.arroyogroup.com/wp-content/uploads/2017/01/The-New-Downtown-Fairview-Heights-TOD-Plan-Design-Guidelines-lo-res.pdf>.

### Shade and Shadow

New shade and shadow patterns in the Market Street segment would be created by the ATS guideway structure and the Market Street/Florence Avenue station. Uses sensitive to shading along Market Street include residential uses and outdoor spaces associated with residential or recreational uses and solar panels.

The Market Street/Florence Avenue station would be located on the southeast corner of Market Street and Florence Avenue. The station's shadow would be cast furthest during sunset on a summer evening and on a winter morning as shown in **Figure 4.1-12** and **Figure 4.1-13**. The shadow would be cast northwest over Florence Avenue on a winter morning and southeast on a winter afternoon as shown in **Figure 4.1-13** and **Figure 4.1-15**. As the surrounding land uses are commercial, no sensitive receptors are present and no shade and shadow impacts to surrounding uses are anticipated. There are no existing solar panels in this segment identified through review of aerial photographs.<sup>25</sup>

The ATS guideway within the Market Street right of way would run the entirety of the segment from south of Regent Street to Manchester Boulevard on single support columns above the roadway median. With single support columns spaced as far apart as feasible and the bottom of the guideway raised 40 feet above Market Street, the shadows created would be narrow and would not affect large areas at any point during the day. The shadow from the guideway would be west of Market Street in the morning and east of Market Street in the afternoon. This narrow shadow pattern would also move throughout the day from northwest to southeast. No areas would be shaded for long periods as shown in **Figures 4.1-9** through **4.1-15**. For these reasons, no adjacent properties will be substantially shaded for long periods of time during the day and impacts from shading will be less than significant.

### Manchester Boulevard Segment

#### ATS Guideway

The guideway in this segment would travel the entire length of Manchester Boulevard between Market Street to Prairie Avenue. As the guideway turns east onto Manchester Boulevard, the guideway would transition from single columns to one-half straddle bent to support the turn onto Manchester Boulevard before going back to single columns in a new median located in Manchester Boulevard. The guideway would widen as it approaches the MSF and require straddle bents that will span across Manchester Boulevard. From the MSF to Prairie Avenue, a combination of single column supports and straddle bents across Manchester Boulevard would be used to support the guideway.

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<sup>25</sup> Google Earth, 2020.

The guideway would travel above the existing two-to-four-lane roadway. **PDF CUL-1** would be incorporated into the project to minimize impacts to the historic buildings along the Manchester Boulevard as called for in the Design Standards and Guidelines, discussed further below.

The design of the guideway would be streamlined and horizontal in expression. As required by **PDF CUL-1**, columns would be positioned in the middle of the roadway with as much space in between columns as is feasible, away from storefronts and adjacent buildings, to support the guideway structure. The design of the guideway would continue to be streamlined and horizontal in expression for integration into the existing built environment. Support columns would be spaced apart with as much distance in between as is feasible to reduce aesthetic impacts to travelers on the ground level and nearby land uses. Where possible, the dual lane guideway would be narrowed and configured to facilitate the use of single columns to support the structure, thus minimizing visual massing. Conceptual guideway alignment plans and column placements are detailed in **Appendix E**. The guideway would be constructed of exposed concrete or similar with tapered edges to reduce perceived massing and would use neutral colors and lightly colored canopies to minimize urban heat island effect. Transitions at crossovers would be smooth and rounded with all conduits, guideway equipment, walkways, drainage systems, and other utilities concealed from the ground view. Overall, the guideway would be simple, clean, respectful of the surrounding environment.

#### Maintenance and Storage Facility

The MSF is proposed on the southwest corner of Manchester Boulevard and Spruce Avenue on a site developed with an existing Vons grocery store. A new replacement Vons grocery will be built on the northwest corner of Manchester Boulevard and Hillcrest Boulevard. The Design Standards and Guidelines require the massing and height of the MSF to be minimized to be as unobtrusive to adjacent neighbors as possible while maintaining functionality and allowing roof access. All rooftop equipment would be fully screened to prevent unsightly views from the ground and adjacent buildings. Building exterior would be covered in a uniform and neutral color to allow proper integration of the structure with the adjacent aesthetic environment. To prevent unsightly graffiti and vandalism, and to reduce the required amount of exterior maintenance, the exterior material of the MSF would be graffiti-resistant.

The MSF would be elevated to match the guideway height. The new Vons grocery store would be located on the northwest portion of the MSF site near the intersection of Manchester Boulevard and Hillcrest Boulevard. The maintenance level for ATS train cars would match the guideway track elevation and will contain mezzanine administrative office space. The ground level would include multiple rows of columns and support beams for structural support. The ground level would consist of a generally unenclosed space containing public parking for the new Vons store. The visual character of the new surface parking lot would be similar to the existing parking lot at the proposed MSF site, with black asphalt and striped spaces

throughout the lot. The Design Standards and Guidelines would require trees and new landscaping as feasible to provide shade and decorative separation of parking spaces.

The MSF would include decorative security walls and fences along the edges of the facility to shield view of the MSF from public view as called for in the Design Standards and Guidelines. Decorative screening walls and fences would be designed to completely enclose all mechanical equipment while allowing for sufficient airflow. All solid fences or walls would be articulated with similar or complementary materials and colors to the building. Any long expanses of walls and fences would be broken up with projections or recessed elements, landscape pockets and changes in materials or textures. Landscape elements, such as vines to create a green wall or screen, would be used in combination with walls and fences to ensure the Project is visually compatible with adjacent uses.

#### Historic Resources and Character

There is one identified historical resource, the Bank of America building located at 320 Manchester Boulevard, on this segment. The scale, massing, and overall composition of this building would remain readily discernable to the viewer despite some interruption of views by three of the guideway columns. Only a small portion of the primary façade of the building would be intermittently obscured depending on the position of the viewer. As described in **PDF CUL-1**, views that are completely unobstructed by support columns are not necessary for the Bank of America building to convey its significance due to its scale and/or setback.

#### Streetscape

Under the Design Standards and Guidelines, the Manchester Boulevard segment between Market Street and Locust Street is designed to complement the standards and guidelines outlined within the *Downtown TOD Plan*,<sup>26</sup> similar to the Market Street segment. Necessary upgrades such as ADA-compliant ramps would be integrated within the Project area as applicable. The sidewalks would be designed to be as wide as possible to allow for places to sit and gather and encourage social interaction which would enhance the attractiveness of the sidewalk. Integrated landscaping along the sidewalk would enhance the attractiveness of the public realm and provide a walkable environment along Manchester Boulevard. Plazas with street furniture provide places to gather and encourage social interaction. The design of the street furniture would complement the overall design of the proposed streetscape improvements.

Separation of pedestrians from the roadway using street trees would be incorporated per the Guidelines. Trees would be planted in a pattern and frequency consistent with existing street trees east and west of the proposed Project in alignment with the shape of the roadway as required by **PDF AES-4**. Street trees

<sup>26</sup> City of Inglewood. New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines. Adopted November 1<sup>st</sup>, 2016. <http://inglewood.arroyogroup.com/wp-content/uploads/2017/01/The-New-Downtown-Fairview-Heights-TOD-Plan-Design-Guidelines-lo-res.pdf>. Accessed November 30, 2020.

and new landscaping would be planted within the median below the ATS guideway along Manchester Boulevard to enhance the aesthetic quality of the roadway. Street furniture and street trees concepts would be consistent with the Design Standards and Guidelines, which include coordinating street furniture and street trees included in the ITC Project with the concepts defined in the *Downtown TOD Plan*, Section 2.8, Street Trees and Furniture.

#### Shade and Shadow

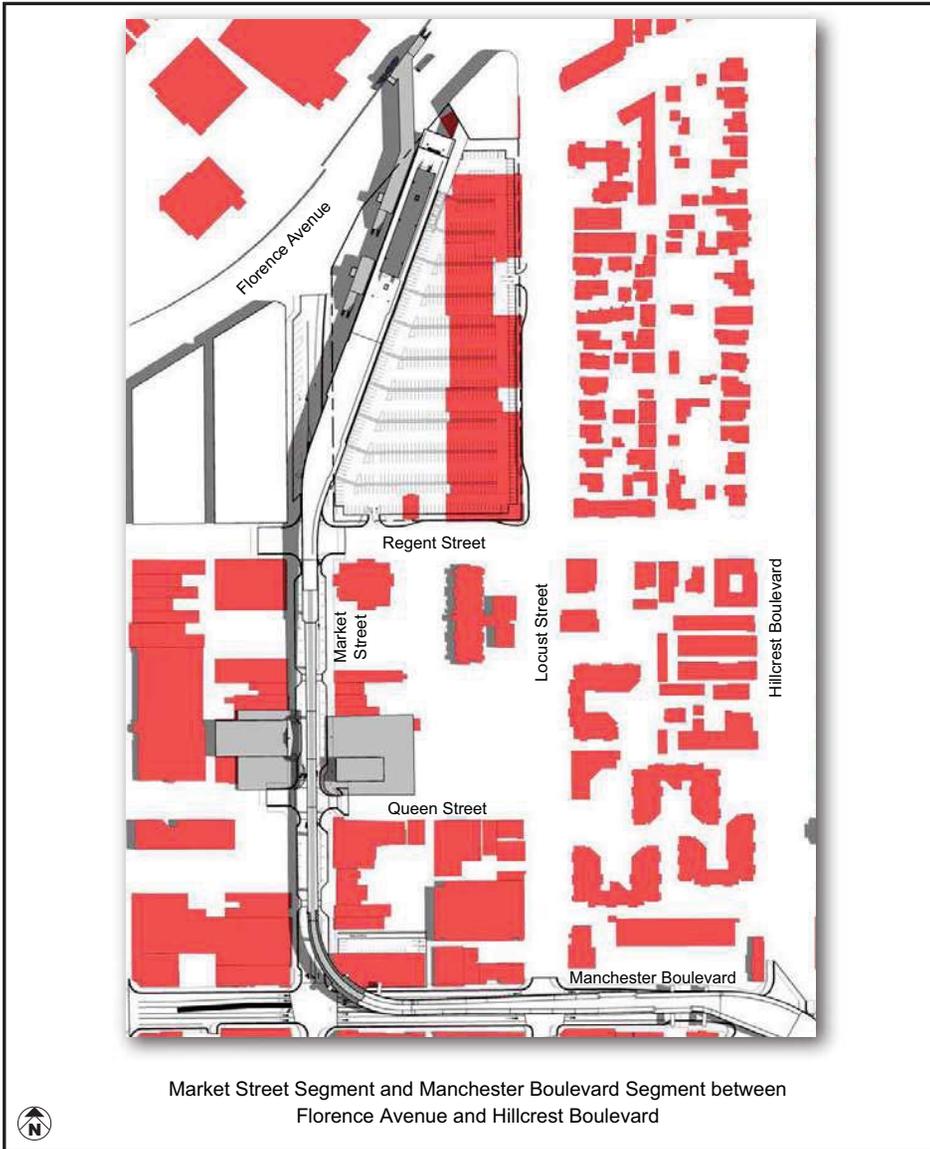
New shade and shadow patterns along the Manchester Boulevard segment would be created by the ATS guideway structures and the MSF. The PDS substation in this segment would be located at the MSF site and, given its size it would not create shadow patterns large enough to encroach on adjacent uses at any point during the year or in the day. Shade and shadow sensitive uses in this segment include the residential uses to the northeast of the segment, west of Osage Avenue. No existing solar panels in this segment that were identified through review of aerial photography.<sup>27</sup>

The MSF would be located off the public right of way on the southeast corner of Manchester Boulevard and Hillcrest Boulevard. The building's shadow would be cast furthest on a winter morning and during sunset on a winter evening. Given the dimension of the building and its distance from surrounding uses, the shadow cast by the building would be entirely contained within the MSF site. As the shade and shadow of the building would be completely contained within the site, no sensitive receptors would be present and no shade and shadow impacts to the surrounding uses is anticipated.

The guideway would be located entirely within the public right of way of Manchester Boulevard. With single support columns spaced as far apart as feasible and the bottom of the guideway raised 40 feet above Manchester Boulevard, the shadows created would be narrow and would not affect large areas at any point during the day. This narrow shadow pattern would also move throughout the day, from northwest to southeast. No areas would be shaded for long periods as shown in **Figure 4.1-16** through **Figure 4.1-19**. For these reasons, no adjacent properties will be substantially shaded for long periods of time during the day.

As the shadow of the guideway would not be extensive and no adjacent property would be shaded for a substantial portion of the day, the proposed Project would have a less than significant shade and shadow impact on the surrounding uses in this segment.

<sup>27</sup> Google Earth, 2020.



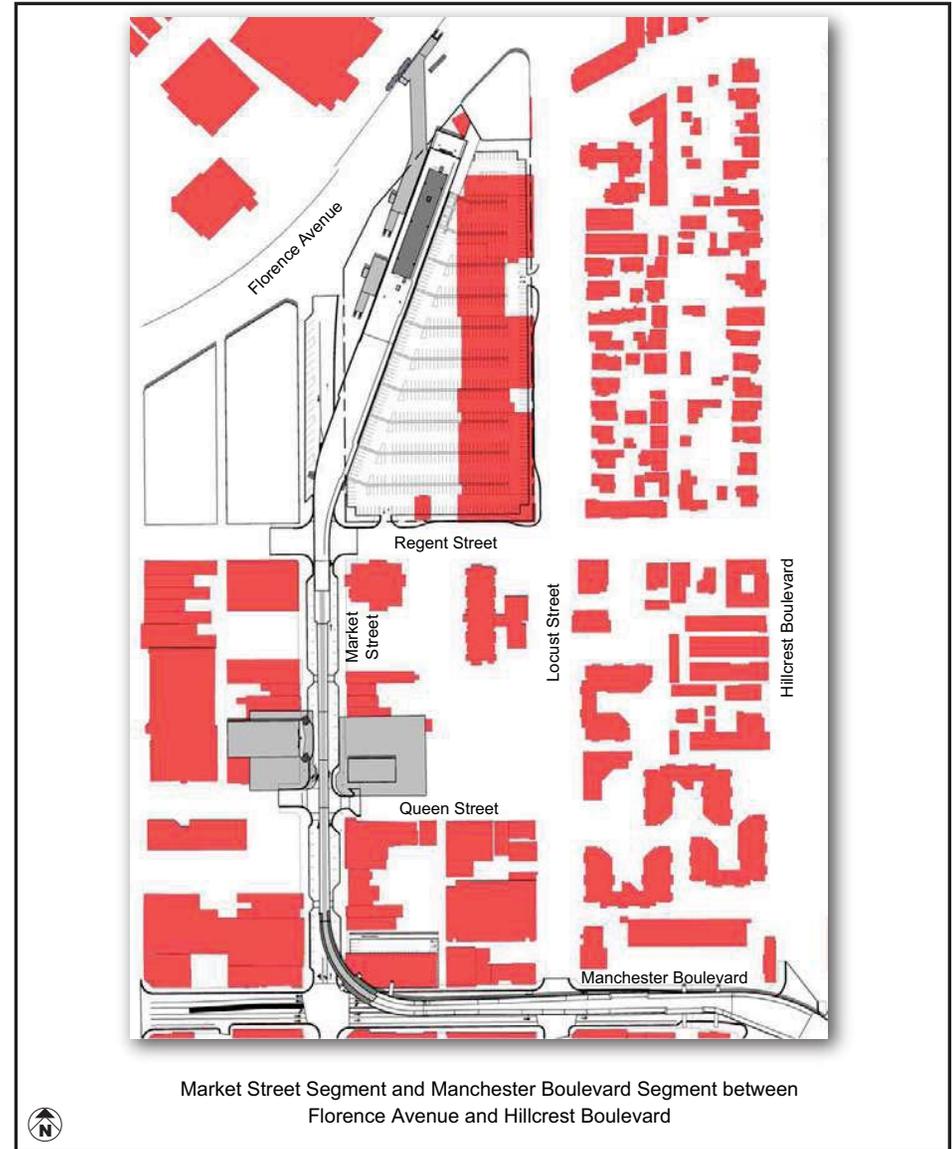
SOURCE: Meridian Consultants LLC - 2021

FIGURE 4.1-9



Market Street and Manchester Boulevard, June 22 at 9:00 AM

251-003-21



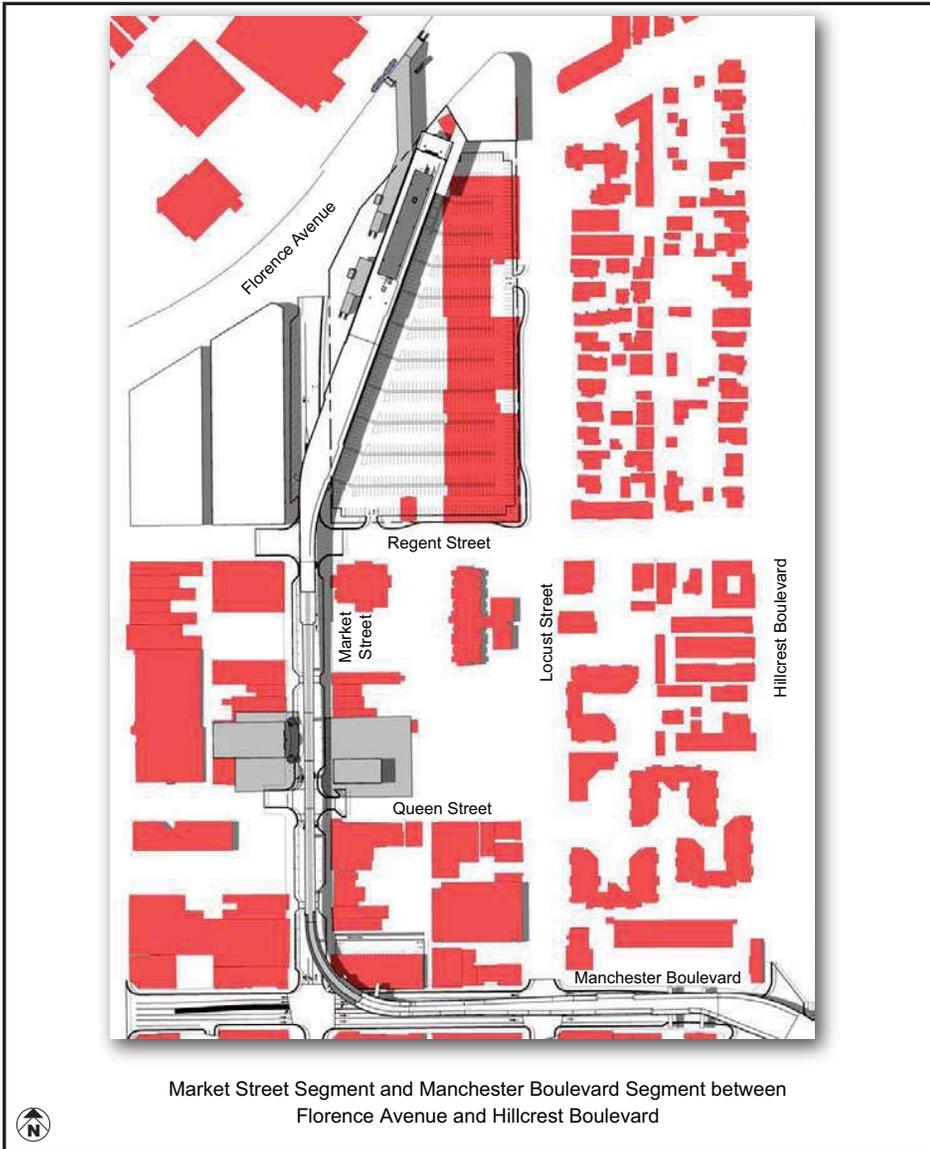
SOURCE: Meridian Consultants LLC - 2021

FIGURE 4.1-10



Market Street and Manchester Boulevard, June 22 at 12:00 PM

251-003-21



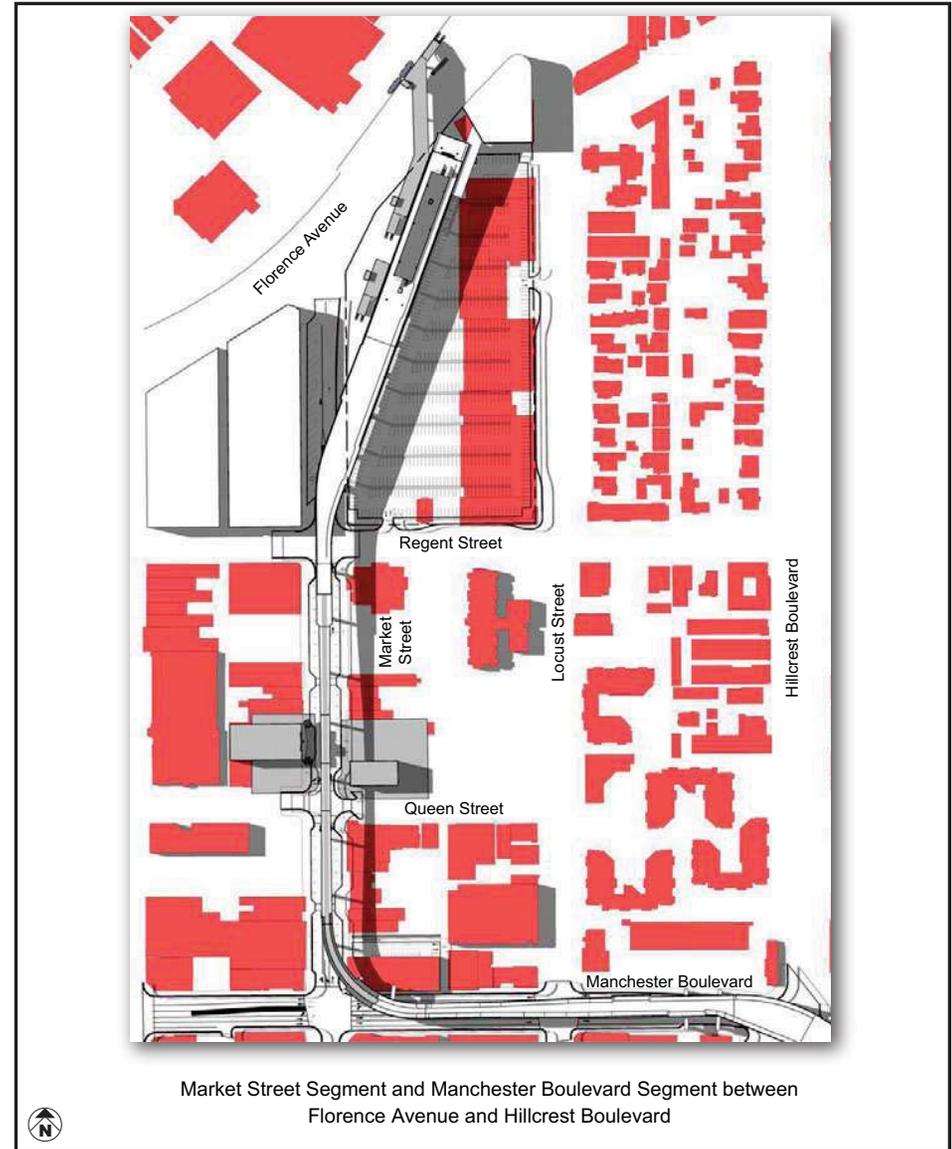
SOURCE: Meridian Consultants LLC - 2021

FIGURE 4.1-11



Market Street and Manchester Boulevard, June 22 at 3:00 PM

251-003-21



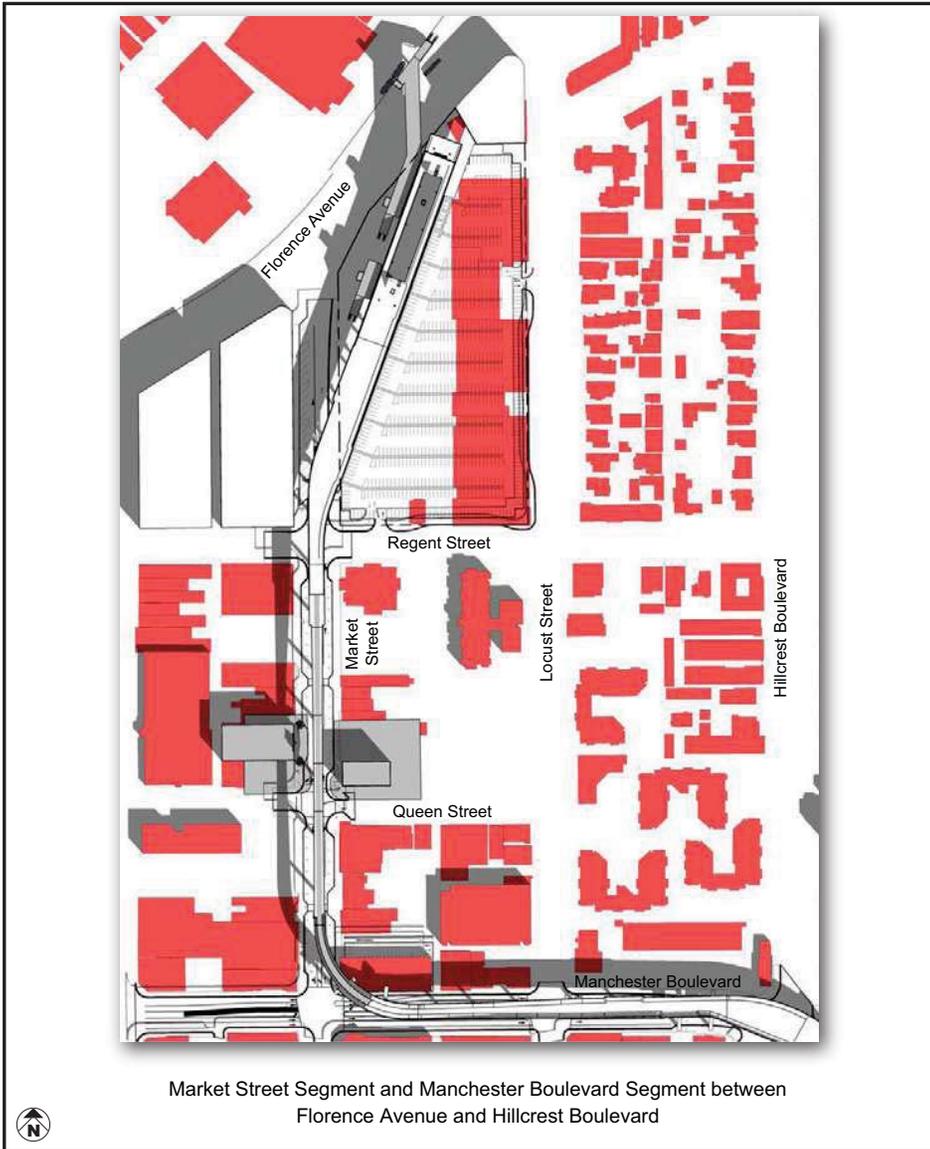
SOURCE: Meridian Consultants LLC - 2021

FIGURE 4.1-12



Market Street and Manchester Boulevard, June 22 at 5:00 PM

251-003-21



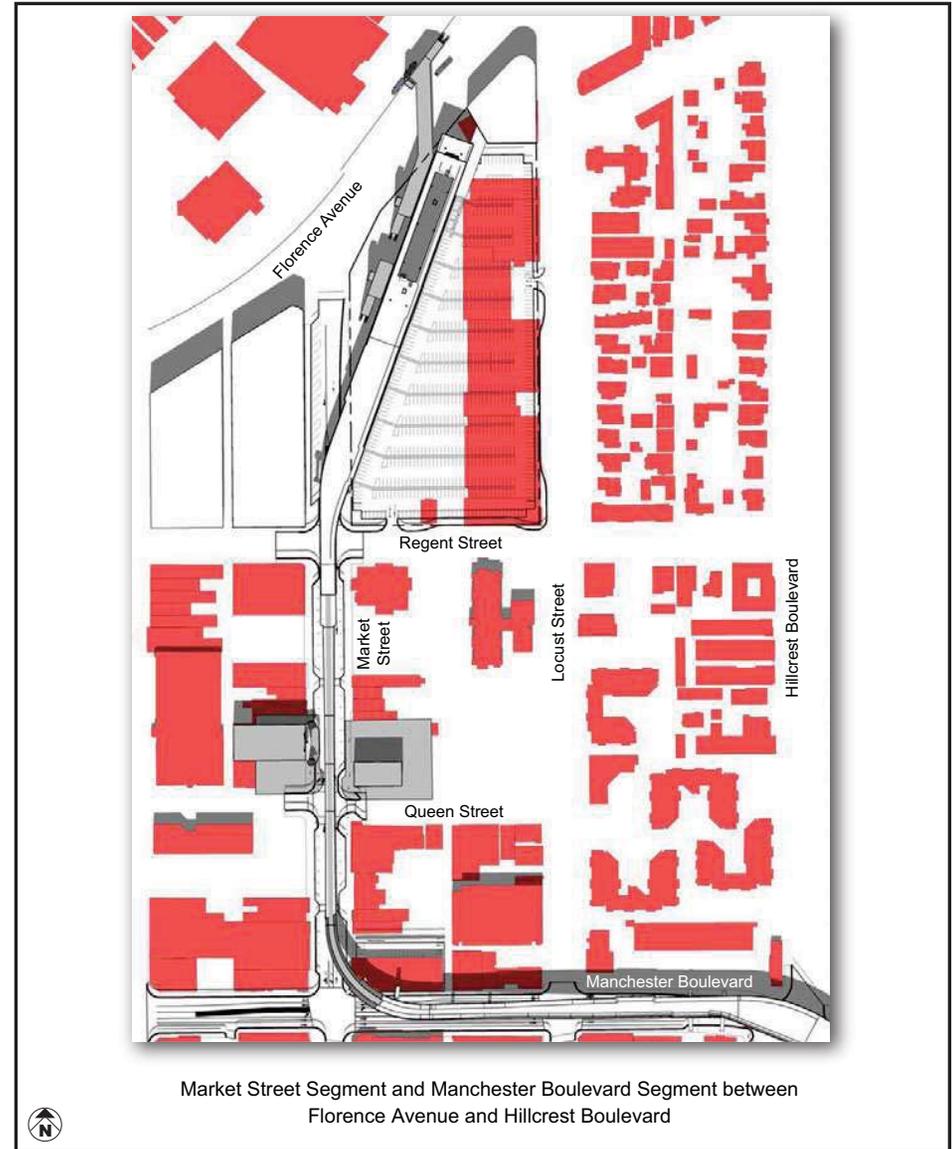
SOURCE: Meridian Consultants LLC - 2021

FIGURE 4.1-13



Market Street and Manchester Boulevard, December 21 at 9:00 AM

251-003-21



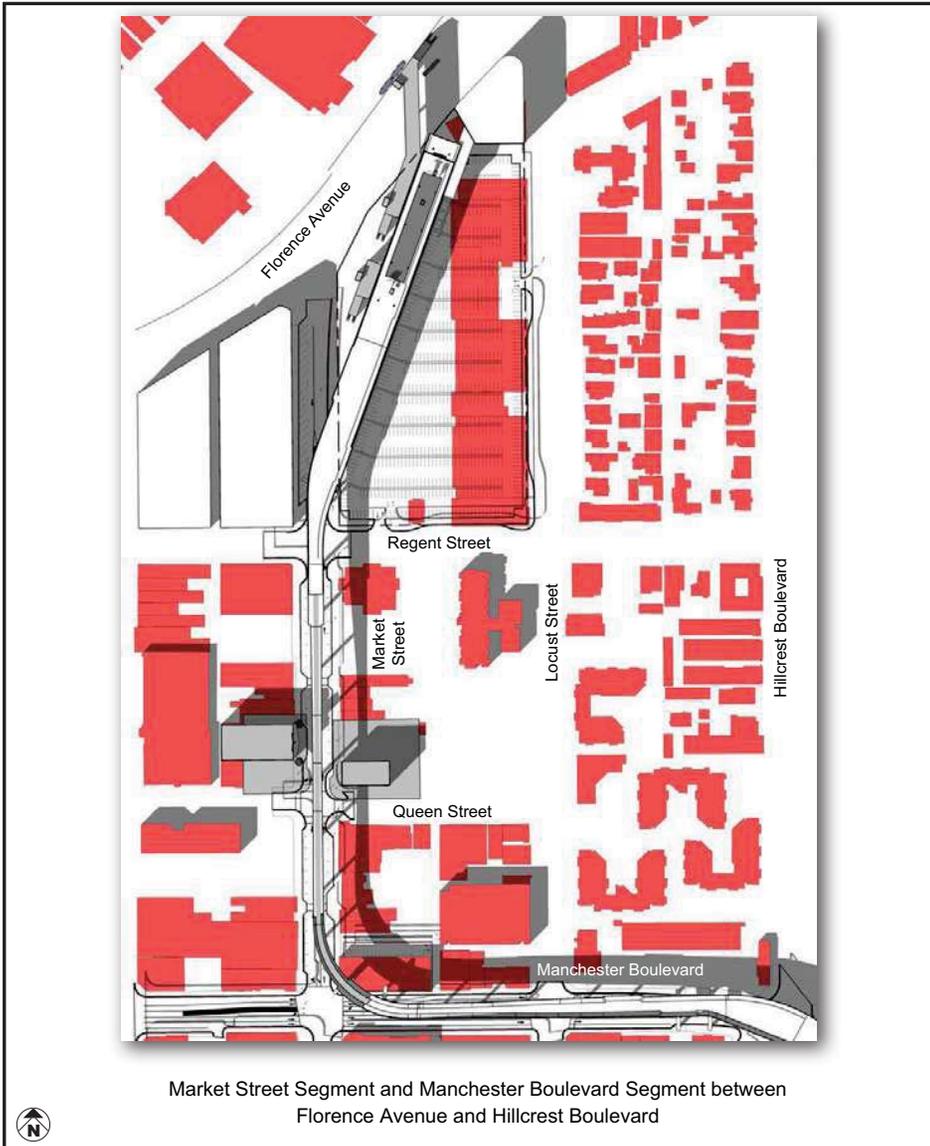
SOURCE: Meridian Consultants LLC - 2021

FIGURE 4.1-14



Market Street and Manchester Boulevard, December 21 at 12:00 PM

251-003-21



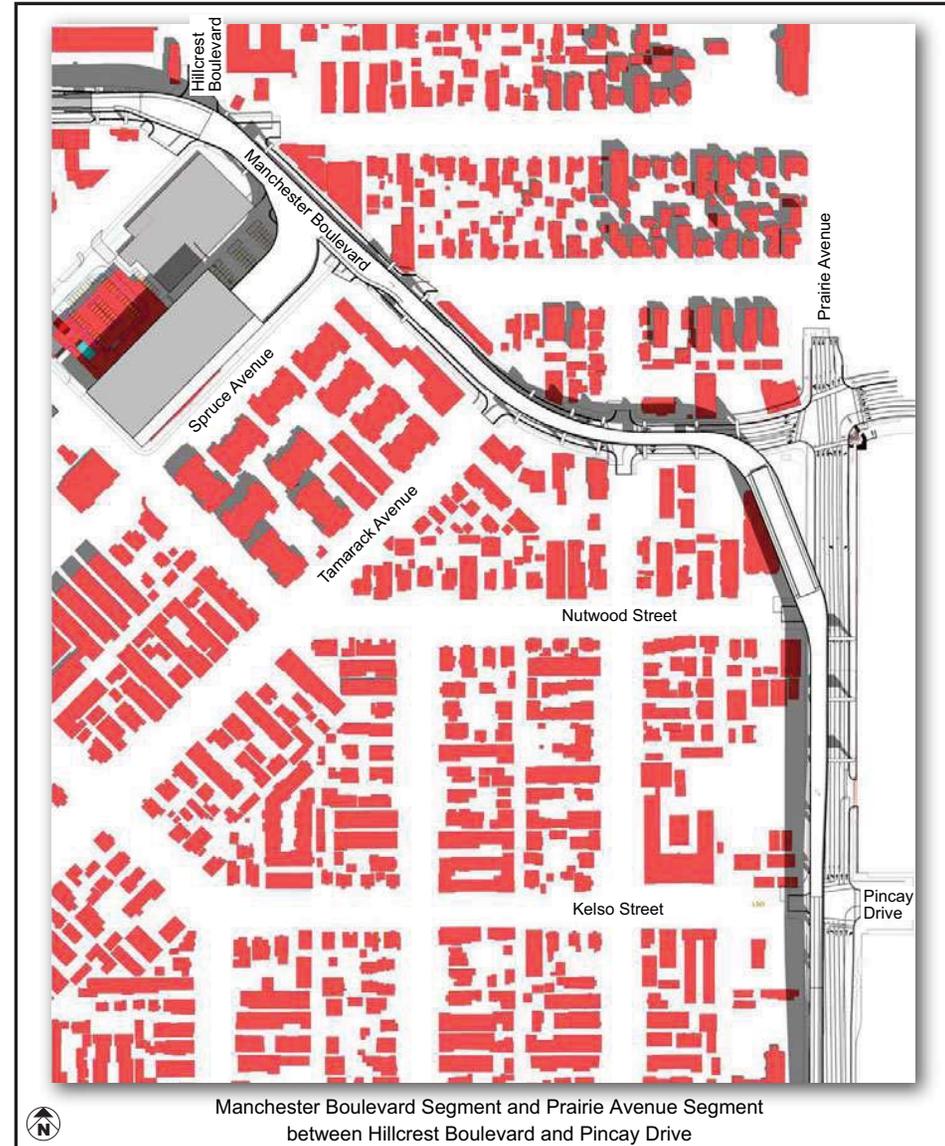
SOURCE: Meridian Consultants LLC - 2021

FIGURE 4.1-15



Market Street and Manchester Boulevard, December 21 at 3:00 PM

251-003-21



SOURCE: Meridian Consultants LLC - 2021

FIGURE 4.1-16



Manchester Boulevard and Prairie Avenue, June 22 at 9:00 AM

251-003-21

## Prairie Avenue Segment

### Prairie Avenue/Manchester Boulevard Station and Prairie Avenue/Hardy Street Station

The design of Prairie Avenue/Manchester Boulevard and Prairie Avenue/Hardy Street stations would be similar to the Market Street/Florence Avenue station, with a sleek, horizontal station design with a distinctive, modern style to enhance the aesthetic appearance of the structures and the identity of the proposed Project. The stations would include ground, mezzanine, and platform levels. The station exteriors would be composed of exposed concrete with a light colored canopy material. The light colored canopies would be the dominant architectural feature providing shade and protection from inclement weather while allowing for natural ventilation and daylight. Vertical circulation elements including escalators, stairs, elevators, and associated enclosures would be constructed using transparent glass to contribute to a modern exterior while allowing unobstructed views from all sides. Wherever possible, transparent screen walls and railings of the appropriate height would be integrated as part of the stations to enhance the appearance of the stations and integrate the structures with their surroundings. Where transparent materials cannot be used, a neutral color palette would be used to add to the modern style of the station. Surface materials used for the station would be resistant to graffiti and vandalism to prevent deterioration and unsightly views of the exteriors. The final design of the station would complement the new surrounding development along Prairie Avenue to visually integrate the proposed Project with the surrounding area.

### Elevated Passenger Walkways

One elevated passenger walkway would be constructed to connect the Prairie Avenue/Manchester Boulevard station with the site of the Forum and another would be constructed to connect the Prairie Avenue/Hardy Street station with the east side of Prairie Avenue adjacent to the Hollywood Park Specific Plan area located on the east side of Prairie Avenue. These passenger connections would be elevated and span over Prairie Avenue and would be designed to visually integrate with their respective ATS stations. These walkways would be simple in design and form to deliver functionality and protect passengers from inclement weather. The exterior of the walkways, elevators and associated enclosures would be constructed with transparent material to the extent feasible to provide a contemporary and appealing aesthetic while providing as much natural daylight and unobstructed views for pedestrians. Neutral tones would be used in areas of the structures where transparent material cannot be used to further integrate the elevated passenger walkways with the surrounding stations and guideway structures. Visually unobstructive barriers would be integrated into walkway design to ensure both pedestrian and roadway safety.

## ATS Guideway

The guideway in this segment would travel the length of Prairie Avenue from Manchester Boulevard to Hardy Street. Upon exiting the Prairie Avenue/Manchester Boulevard station and continuing south, the elevated guideway would continue along the west side of Prairie Avenue until both tracks gradually transition together immediately north of Kelso Street and continue in this configuration south to Victory Street, where the tracks diverge to enter into the Prairie Avenue/Hardy Street station on the northwest corner of the Prairie Avenue and Hardy Street intersection. Three Straddle bent columns would support this segment of the guideway as it proceeds south onto Prairie Avenue just past Nutwood Street. As the guideway converges, the structure would transition to single column supports located on the western side of Prairie Avenue. This portion of the guideway would diverge south of Victory Street to the west of Prairie Avenue as it approaches the Prairie Avenue/Hardy Street station and would be supported by straddle bents in the sidewalk and west of the public right of way.

The design of the guideway would continue to be streamlined and horizontal in expression to support integration into the existing environment and the anticipated new developments on the east side of Prairie Avenue. Columns would be spaced apart with as much distance in between as is feasible to reduce aesthetic impacts to travelers on the ground level and nearby land uses. Where possible, the dual lane guideway would be narrowed and configured to facilitate the use of single columns to support the structure, thus minimizing visual massing. For conceptual guideway alignment plans and column placements, please refer to **Appendix E**. The guideway would be constructed of exposed concrete or similar with tapered edges to reduce perceived massing. The guideway would use neutral colors and lightly colored canopies to minimize urban heat island effect. Transitions at crossovers would be smooth and rounded with all conduits, guideway equipment, walkways, drainage systems, and other utilities concealed from the ground view. Overall, the guideway would be simple, clean, respectful of the surrounding environment.

### Historic Resources and Character

There are two identified historical resources in this segment: the Forum located at 3900 Manchester Boulevard and the Lighthouse McCormick Mortuary located at 619 Prairie Avenue along this segment. The scale, massing, and overall composition of the Forum and the Lighthouse McCormick Mortuary would remain readily discernable to the viewer despite some interruption of views by the stations, guideway and guideway columns and would still convey their historic significance as historic resources. As such, the project would not substantially degrade the existing visual character of these two historic resources and impacts would be less than significant.

### Streetscape

The entire segment not directly adjacent to the HPSP development area would be governed by local ordinances and the Design Standards and Guidelines. The sidewalk zones would be constructed as wide as possible on both sides of the street, with planting zones between the sidewalk and the street where feasible. The sidewalks would be designed to be as wide as possible to allow for comfortable pedestrian travel. Integrated landscaping along the sidewalk would enhance the attractiveness of the public realm and provide a walkable environment along Prairie Avenue. Plazas with street furniture would provide places to gather and encourage social interaction. The design of the street furniture would complement the overall design of the proposed streetscape improvements. Street trees and landscaping would be provided where possible to provide shade and create a walkable pedestrian pathway. Street trees on the east side of Prairie Avenue would continue the existing placement of those from the Inglewood Cemetery, north of Manchester Boulevard. Street trees on the west side of Prairie Avenue would be spaced to match the placement of both the elevated guideway support columns and street trees on the east side of the roadway. The planting of street trees and integrated landscaping along the sidewalk on Prairie Avenue would enhance the attractiveness of the streets. Planting zones would also be incorporated into roadway medians where feasible to enhance the aesthetic quality of the roadway.

To accommodate the proposed ATS while maintaining the existing roadway capacity along Prairie Avenue, the ITC Project includes the proposed relocation of one existing traffic lane on the east side of Prairie Avenue within a variable easement for street purposes, to be acquired by the City over private property that currently comprises the existing 30-foot setback area along the west edge of the HPSP area. While existing sidewalk widths along Prairie would be maintained, some of the existing landscaping, signs and other streetscape improvements would be reduced or eliminated in certain locations.

Adjacent to the HPSP on the east side of Prairie Avenue, between Arbor Vitae Street and Hardy Street, the Design Standards and Guidelines define a streetscape design complementary to the streetscape design guidelines for the HPSP project.<sup>28</sup> The HPSP streetscape plan is designed to create a diverse urban forest that will integrate development in Hollywood Park with the adjoining urban fabric and assist in developing districts of distinctive and appropriate character. Tree selections on Prairie Avenue in the HPSP design guidelines consist of Afghan Pine, Camphor Tree, Southern Magnolia, and Canary Island Pine trees. Prairie Avenue adjacent to HPSP would include residential and retail gateways, with the goal of providing an appealing environment for pedestrians and vehicles traveling along Prairie Avenue. All existing

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<sup>28</sup> Hollywood Park Lan Company, LLC. *Hollywood Park Specific Plan*. <https://www.cityofinglewood.org/DocumentCenter/View/1347/Hollywood-Park-Specific-Plan>. Adopted July 8, 2009, Amended September 23, 2014, Amended February 24, 2015.

landscaping, signs and other streetscape improvements reduced or eliminated as a result of implementation of the Project will be replaced consistent with the Design Standards and Guidelines.

### Shade and Shadow

New shade and shadow patterns in the Prairie Avenue segment would be created by the ATS guideway structures, the Manchester Boulevard/Prairie Avenue, and the Prairie Avenue/Hardy Street stations. Nearby shade and shadow sensitive uses include residential uses west of Prairie Avenue. No existing solar panels in this segment that were identified through review of aerial photographs.<sup>29</sup>

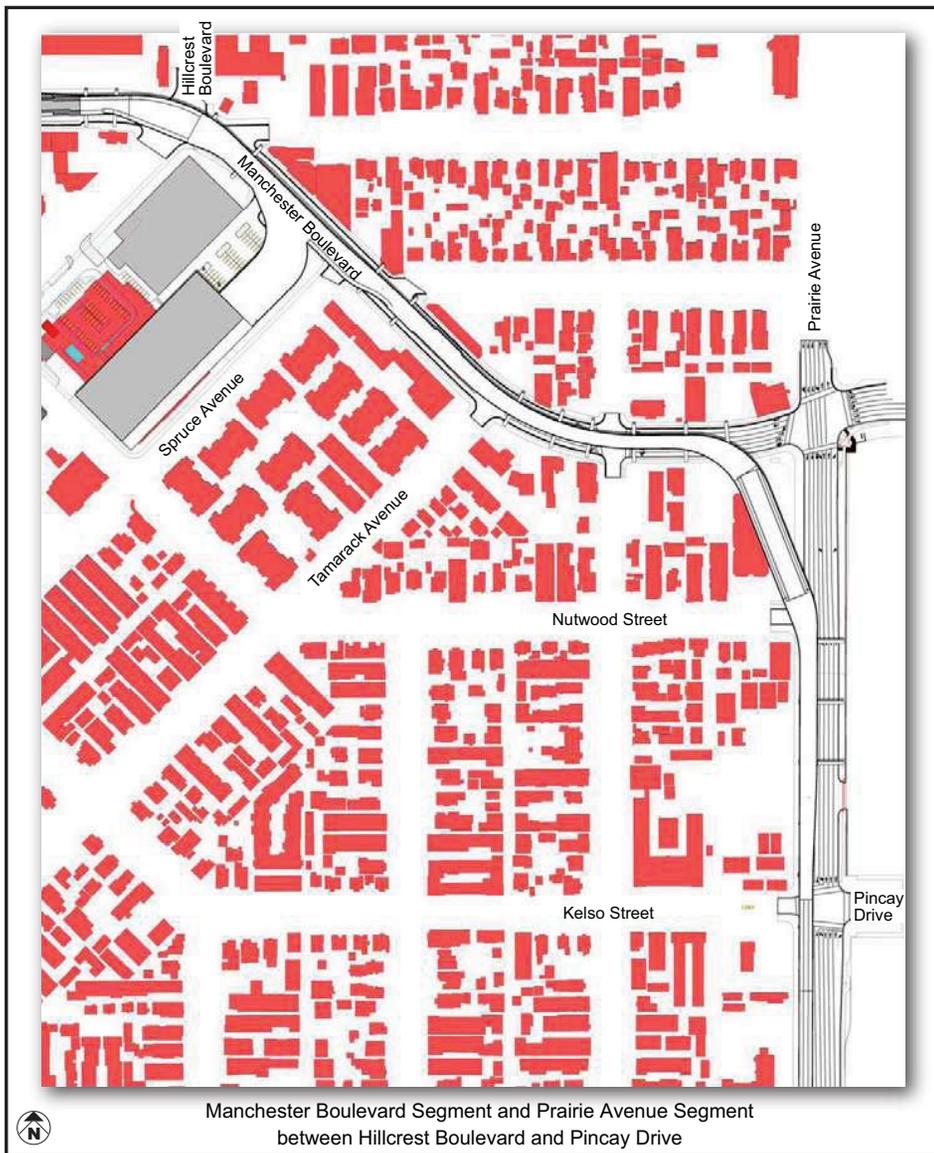
The Manchester Boulevard/Prairie Avenue and the Prairie Avenue/Hardy Street stations would both be located immediately west of Prairie Avenue. The stations would cast shadows furthest on a winter morning as shown in **Figure 4.1-20** and **Figure 4.1-27**, and during a winter evening as shown in **Figure 4.1-22** and **Figure 4.1-29**. The winter morning shadows from the stations would be almost entirely contained on the station sites and no uses sensitive to shading would be affected. Winter mid-day and afternoon shadows would not affect any adjacent uses. The shorter shadows during summer and other times of year would also not affect any adjacent uses sensitive to shading.

The guideway would run the entirety of the segment from Manchester Boulevard to Hardy Street on the west side of Prairie Avenue adjacent to the roadway. With single support columns spaced as far apart as feasible and the bottom of the guideway raised 40 feet adjacent to the west side of the roadway, the shadows created would be narrow and would not affect large areas at any point during the day. This narrow shadow pattern would also move throughout the day from northwest to southeast. No areas would be shaded for long periods as shown in **Figure 4.1-17** through **Figure 4.1-29**. For these reasons, no adjacent properties will be substantially shaded for long periods of time during the day.

Uses adjacent to the planned location of the guideway along the west side of Prairie Avenue include commercial, residential, and institutional uses, including the Kelso Elementary School and the Daycare Center. The recreational areas of these facilities are considered shade sensitive uses. Only the western edge of the Kelso School campus would be shaded during mornings from the guideway and majority of the campus would not be shaded during any portion of the day. No portion of the campus would be shaded in the afternoon. The impact of shading on the Kelso School campus, therefore, would be less than significant.

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<sup>29</sup> Google Earth, 2020.



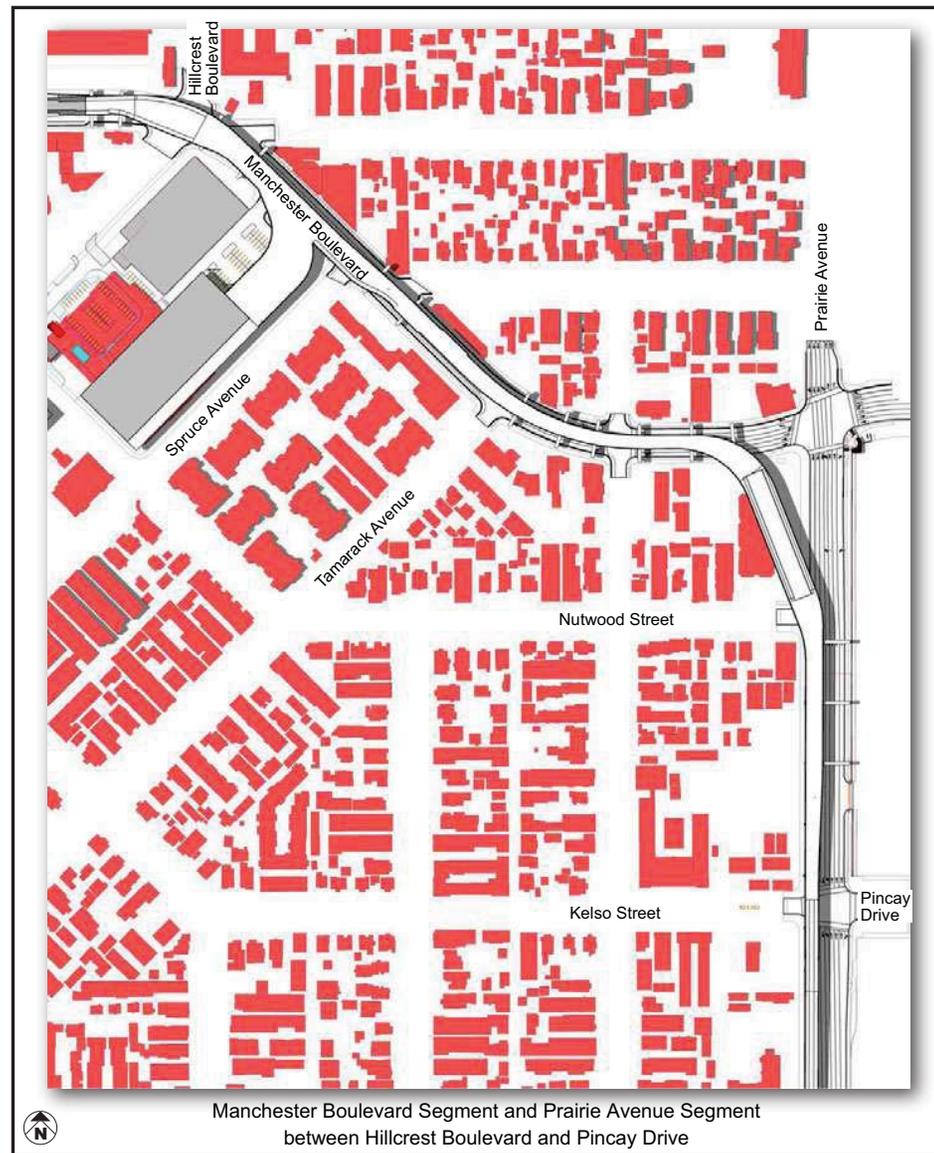
SOURCE: Meridian Consultants LLC - 2021

FIGURE 4.1-17



Manchester Boulevard and Prairie Avenue, June 22 at 12:00 PM

251-003-21



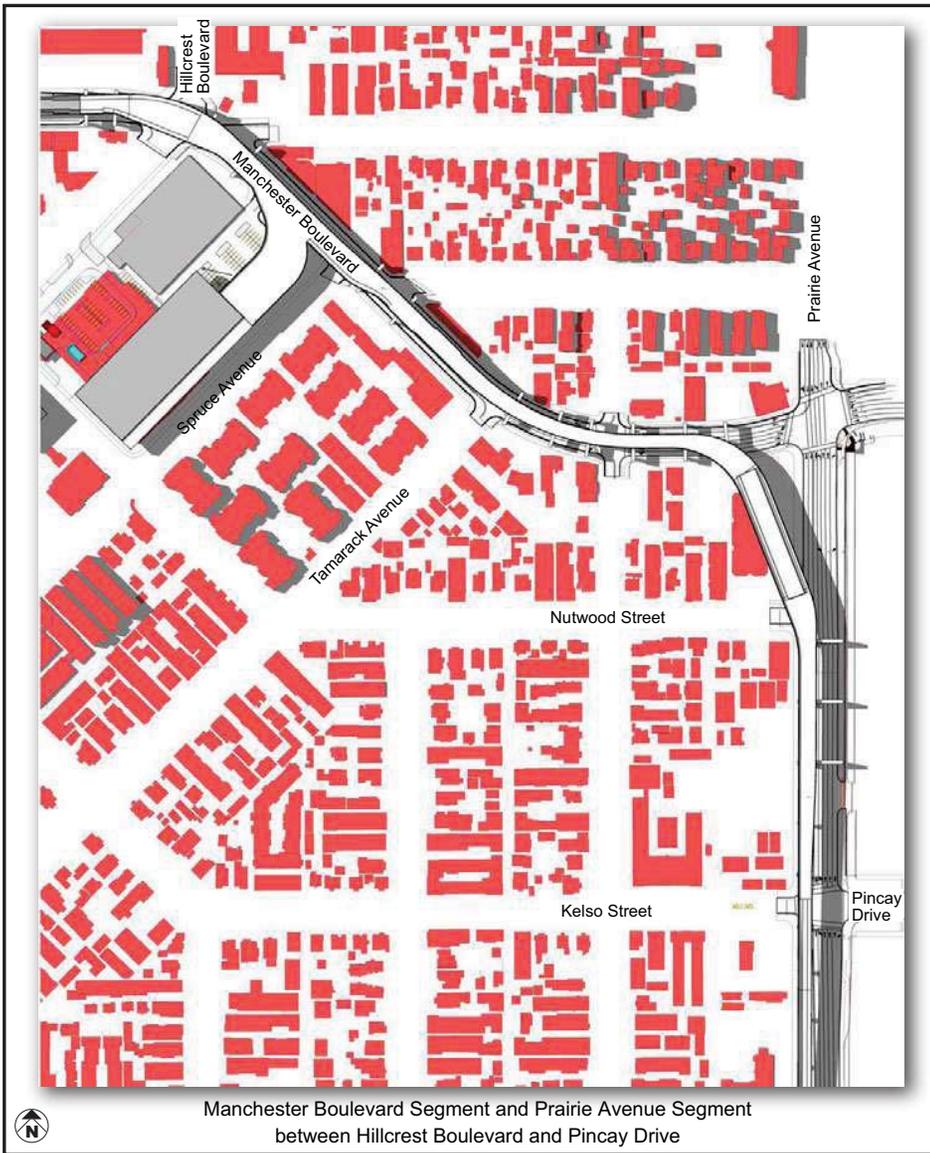
SOURCE: Meridian Consultants LLC - 2021

FIGURE 4.1-18



Manchester Boulevard and Prairie Avenue, June 22 at 3:00 PM

251-003-21



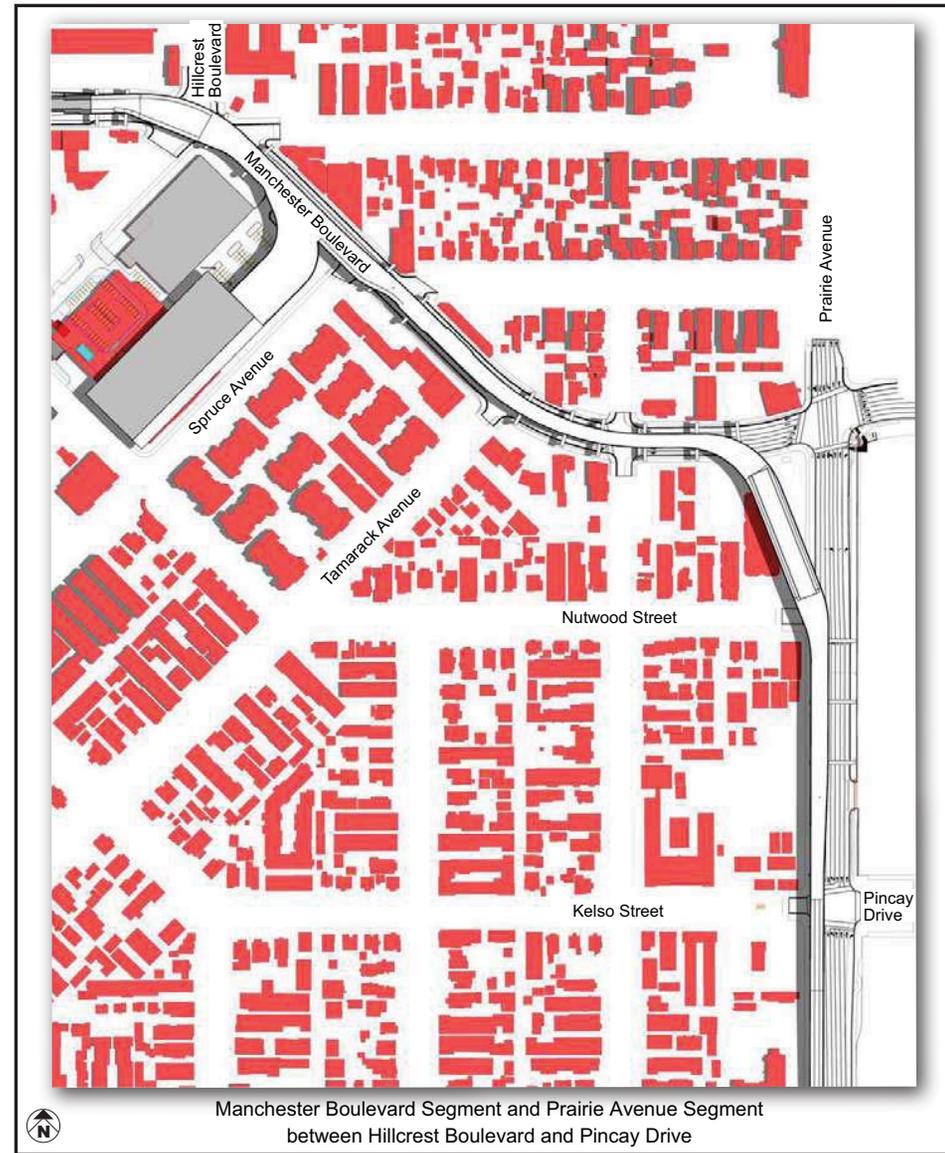
SOURCE: Meridian Consultants LLC - 2021

FIGURE 4.1-19



Manchester Boulevard and Prairie Avenue, June 22 at 5:00 PM

251-003-21



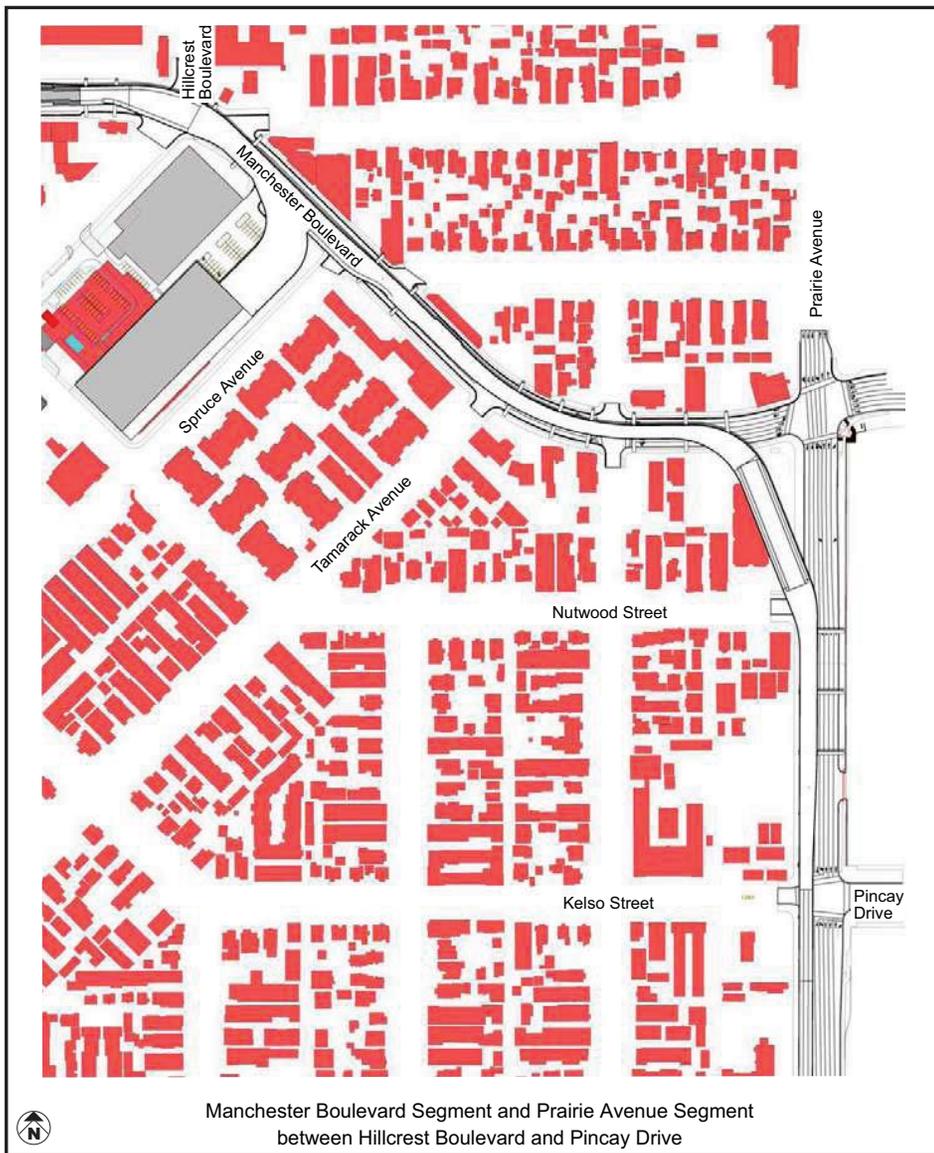
SOURCE: Meridian Consultants LLC - 2021

FIGURE 4.1-20



Manchester Boulevard and Prairie Avenue, December 21 at 9:00 AM

251-003-21



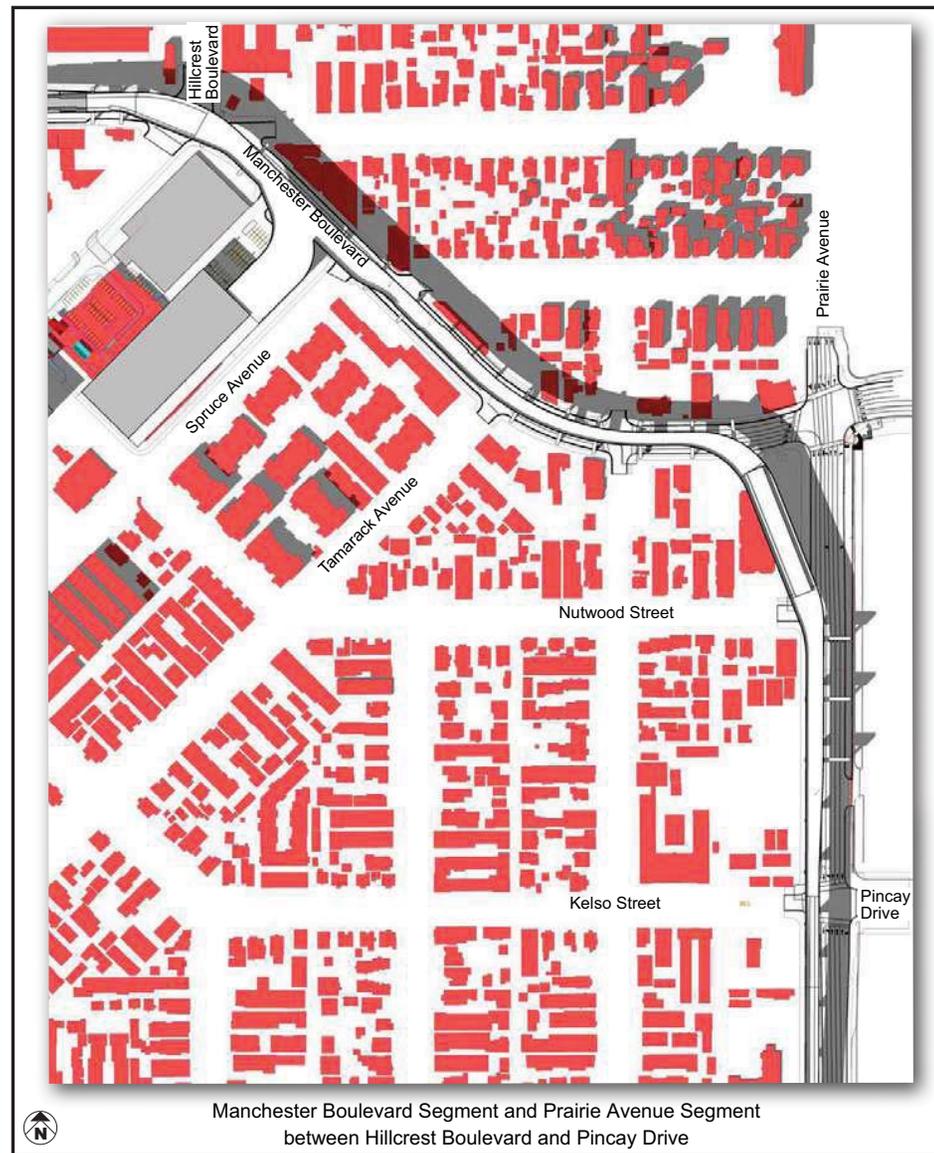
SOURCE: Meridian Consultants LLC - 2021

FIGURE 4.1-21



Manchester Boulevard and Prairie Avenue, December 21 at 12:00 PM

251-003-21



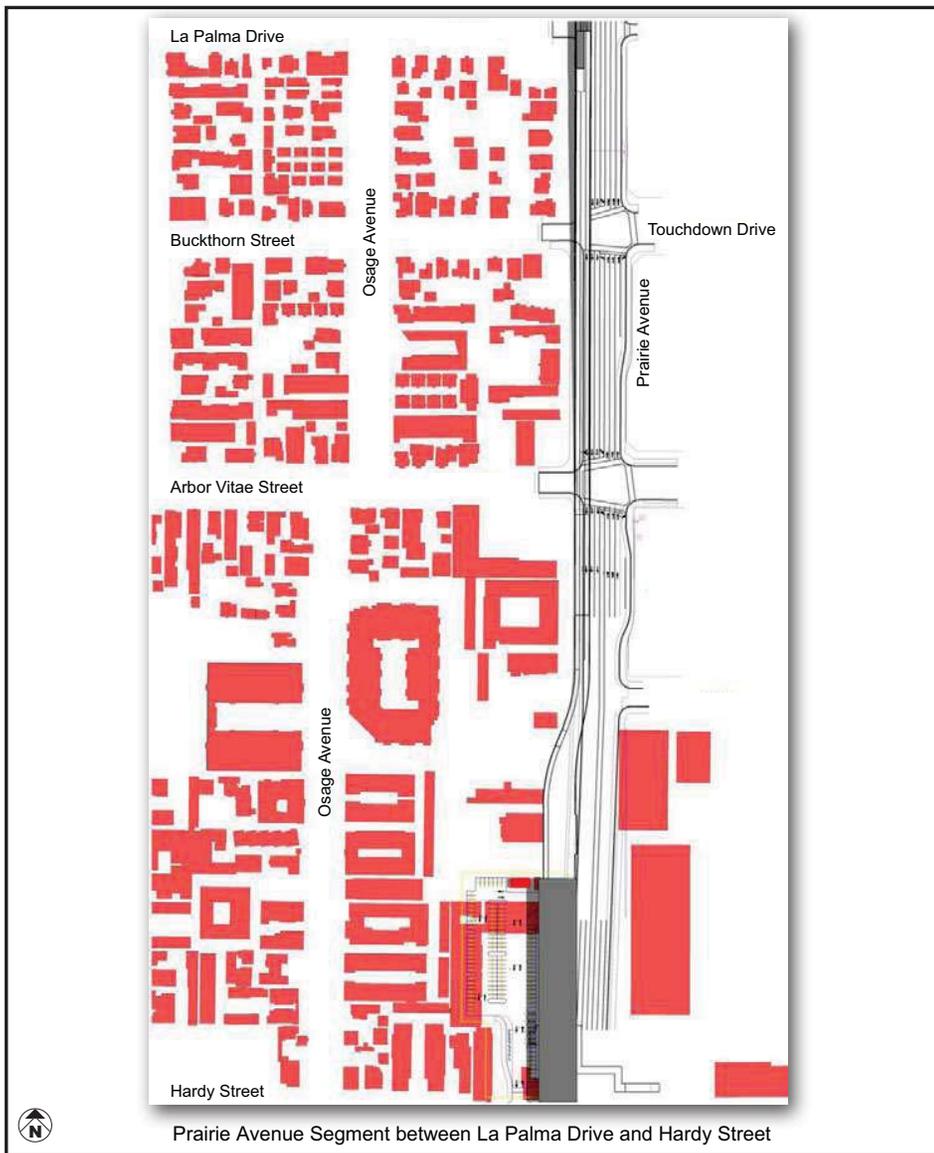
SOURCE: Meridian Consultants LLC - 2021

FIGURE 4.1-22



Manchester Boulevard and Prairie Avenue, December 21 at 3:00 PM

251-003-21



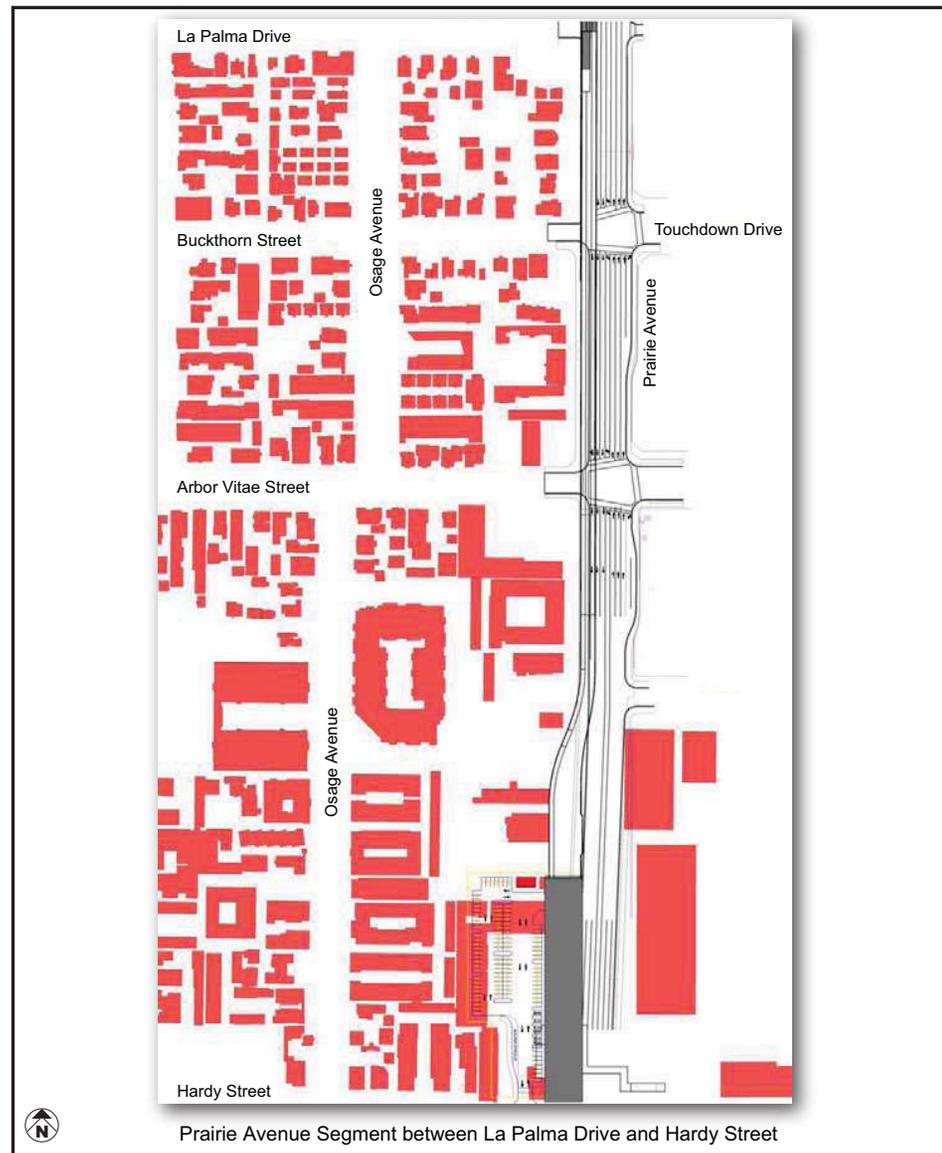
SOURCE: Meridian Consultants LLC - 2021

FIGURE 4.1-23



Prairie Avenue, La Palma Drive to Hardy Street, June 22 at 9:00 AM

251-003-21



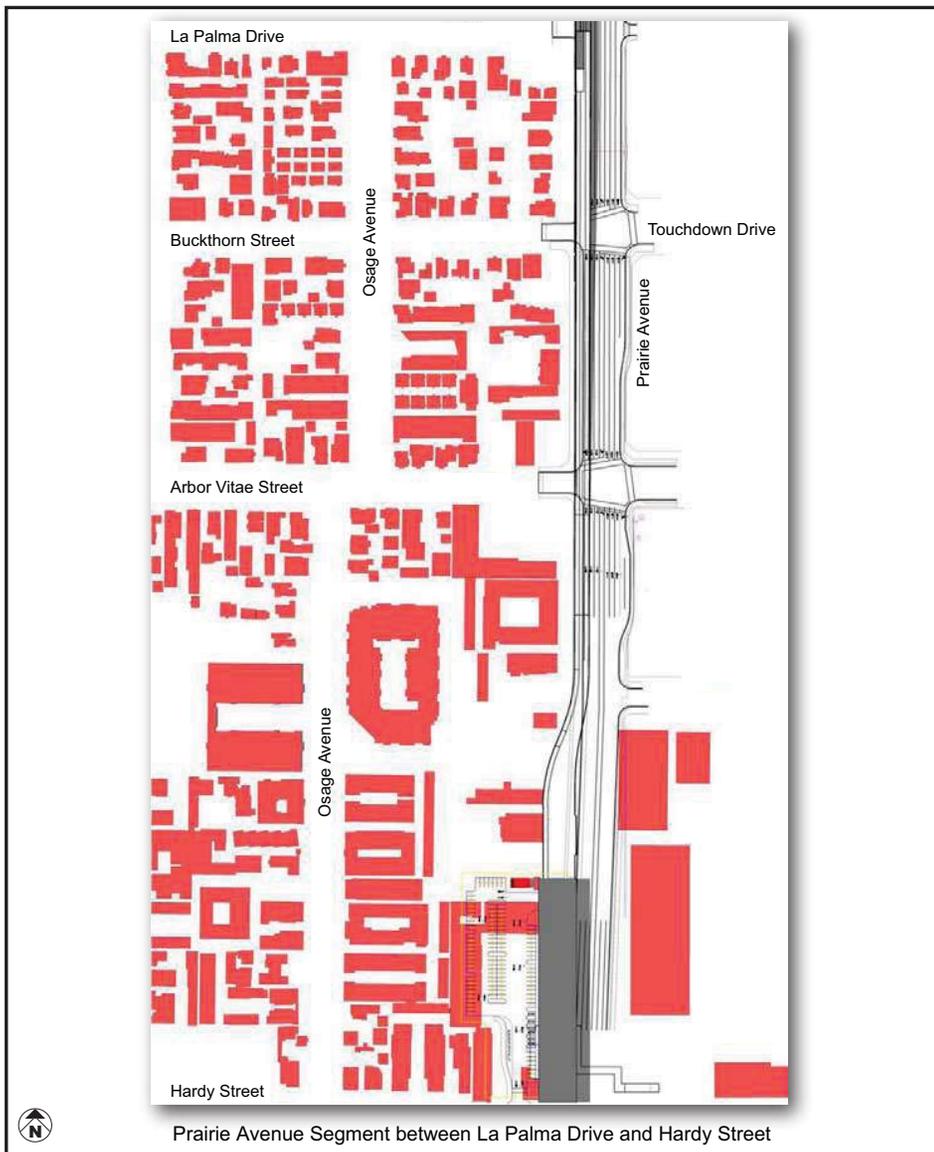
SOURCE: Meridian Consultants LLC - 2021

FIGURE 4.1-24



Prairie Avenue, La Palma Drive to Hardy Street, June 22 at 12:00 PM

251-003-21



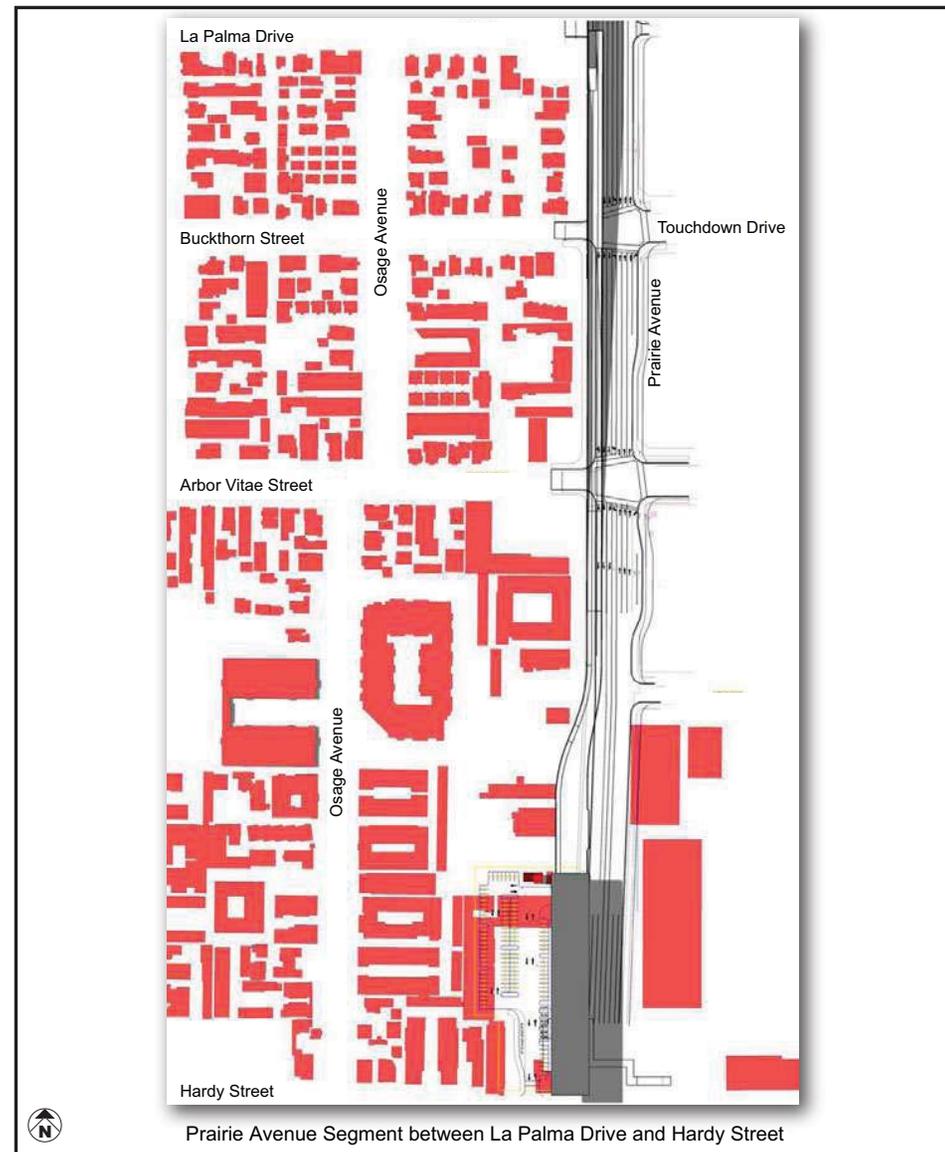
SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021

FIGURE 4.1-25



Prairie Avenue, La Palma Drive to Hardy Street, June 22 at 3:00 PM

251-003-21



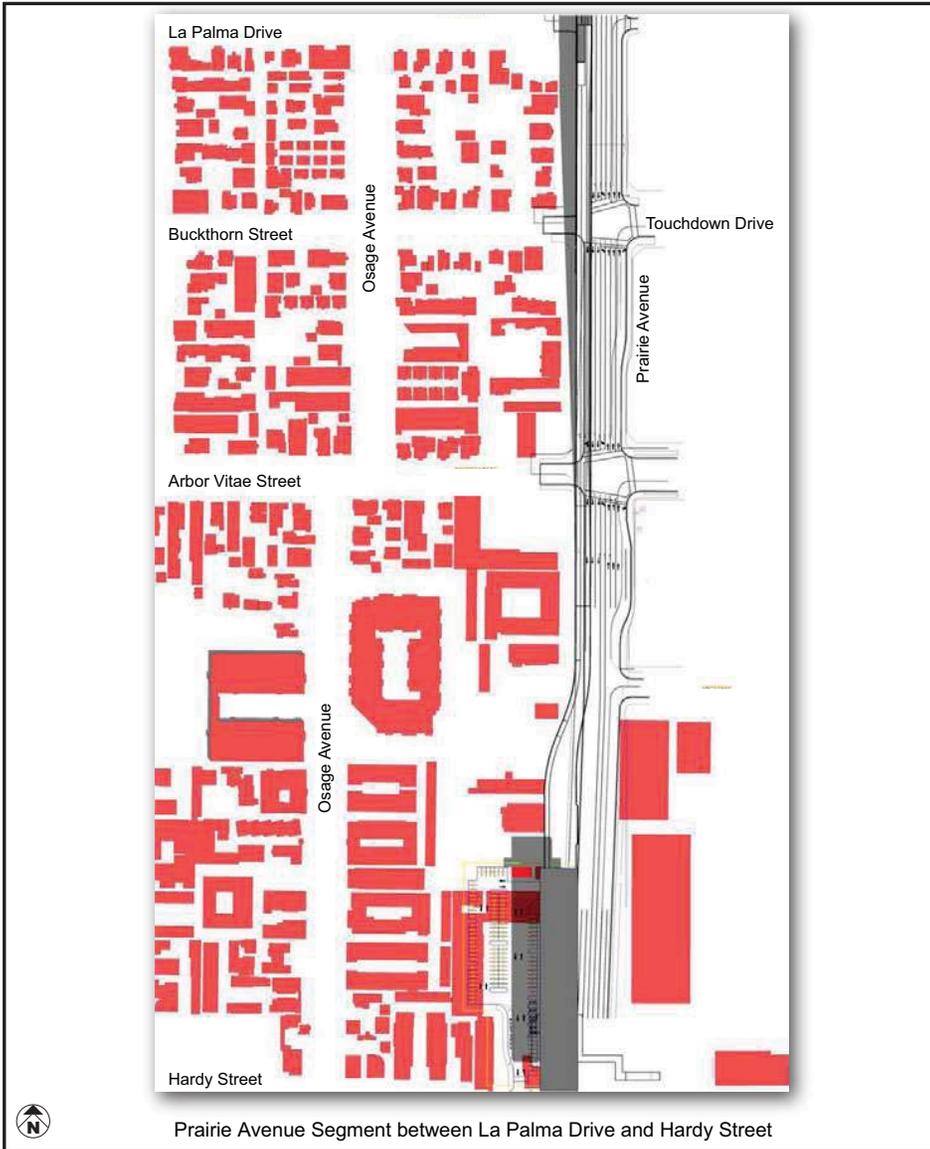
SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021

FIGURE 4.1-26



Prairie Avenue, La Palma Drive to Hardy Street, June 22 at 5:00 PM

251-003-21



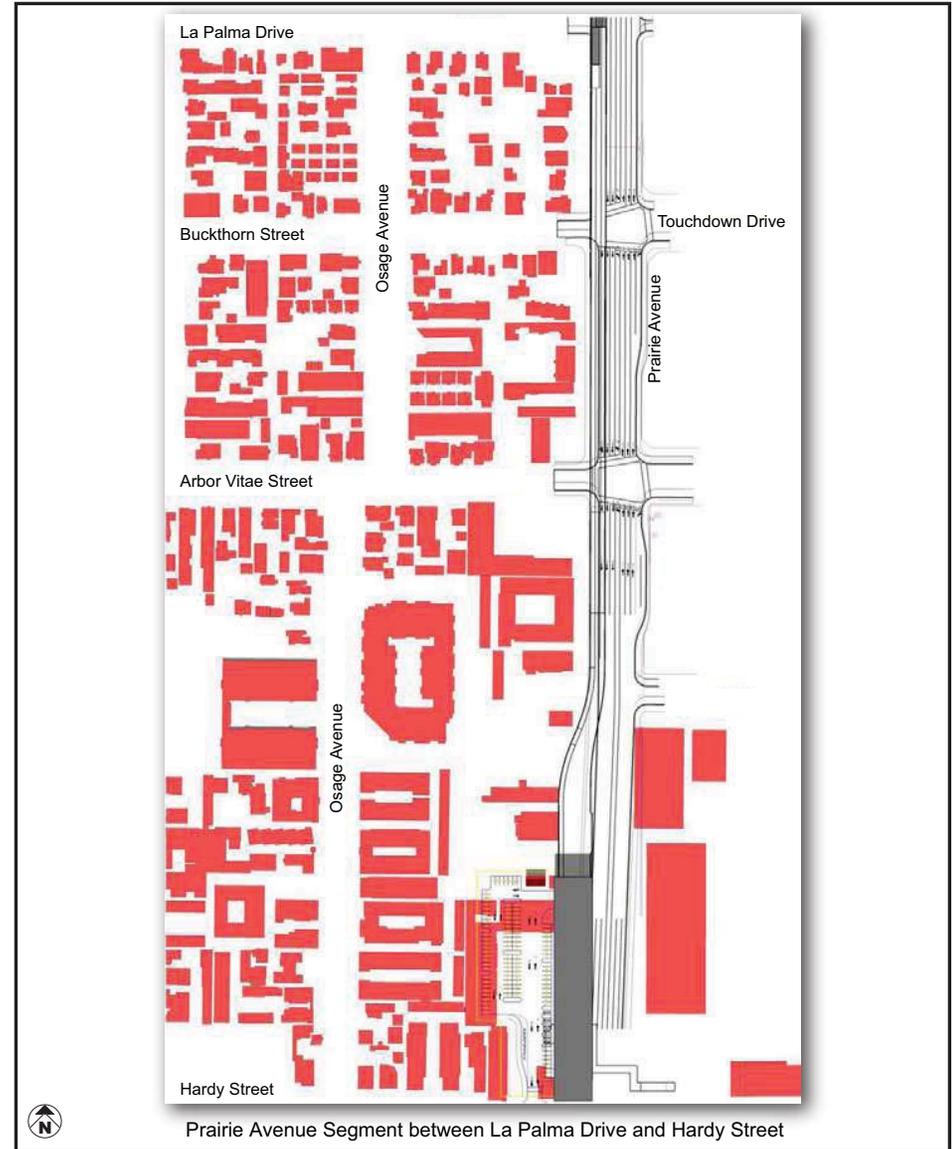
SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021

FIGURE 4.1-27



Prairie Avenue, La Palma Drive to Hardy Street, December 21 at 9:00 AM

251-003-21



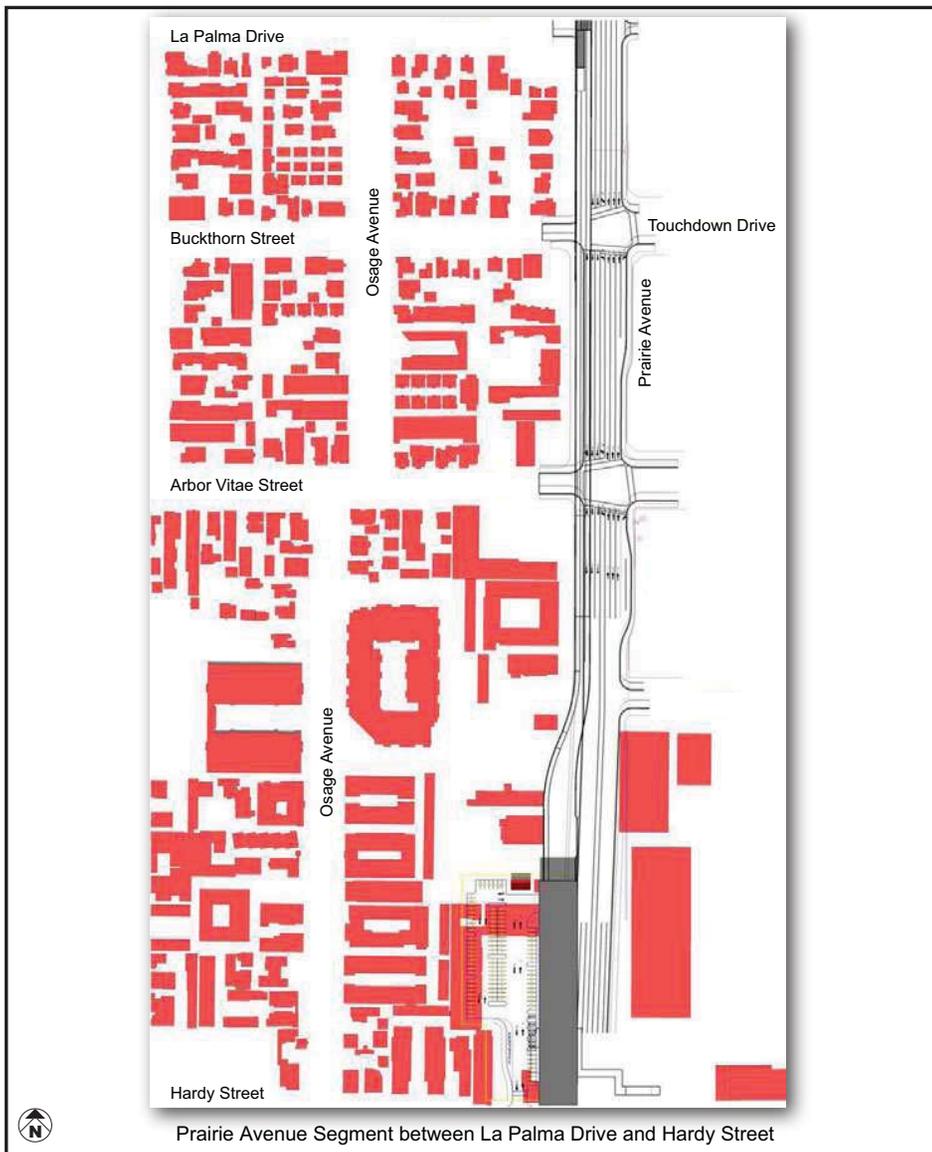
SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021

FIGURE 4.1-28



Prairie Avenue, La Palma Drive to Hardy Street, December 21 at 12:00 PM

251-003-21



SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021

FIGURE 4.1-29



Prairie Avenue, La Palma Drive to Hardy Street, December 21 at 3:00 PM

251-003-21

As the shadow of the guideway would not affect any specific location for an extended time due to its size and location, the proposed Project would have a less than significant shade and shadow impact on the surrounding uses in this segment.

The addition of the components of the ITC Project including stations, elevated passenger walkways, ATS guideway along the proposed alignment along Market Street, Manchester Boulevard and Prairie Avenue and the proposed street improvements, including the shift of one of the existing travel lanes on Prairie Avenue up to thirty (30) feet into the existing setback area, the construction of the new Vons store on the corner of Manchester Boulevard and Hillcrest Boulevard, will not result in substantial adverse change of the existing visual character of the surrounding developed urban area.

**Mitigation Measures**

No mitigation is required.

**Level of Significance**

While the proposed Project, inclusive of the ATS guideway, stations, MSF, PDS substations, street improvements, and the new Vons store would result in changes to the existing visual character of the areas located along the proposed alignment of the ATS system, the Project would not result in substantial adverse changes to the existing visual character of these street corridors due to the design character of the Project as defined in the Design Standards and Guidelines and the project design features, which would result in the integration of the components of the Project into these street corridors.

Visual impacts associated with construction of the proposed Project would be less than significant with the implementation of measures from the CCP. These CCP measures would reduce the visual duration of the obtrusive erosion control devices to as short of a duration as feasible. The stockpile areas would be limited to areas less visibly sensitive as approved by the City. These measures would minimize the visual degradation impacts of the construction activities. The construction activities would also be phased to limit the exposure of one segment from continual exposure to construction activities and unpleasant views. Construction activities at each segment and overall would be temporary in nature and visual impacts would be alleviated once the construction is completed.

Overall, the ATS structure, including the stations, guideway, MSF, and support facilities, would complement the existing surrounding visual environment by using transparent and neutral tones as part of its design character. The design would be in the modernist style to enhance the aesthetically pleasing quality of the structure. To prevent unsightly views and defacing of the structure, the exterior material would be anti-graffiti and anti-vandalism. The final design of the stations would also reflect the visual character of Downtown Inglewood along Market Street and the new development occurring along Prairie Avenue.

The design of the ATS guideway would allow the continued expression of the buildings identified as historic resources. The height of the ATS guideway, the distance of the guideway from the edge of the buildings and the size and spacing of the support columns have been designed in a manner that maintains important aspects of the existing setting for the historic resources located along the proposed alignment and ensures that the overall scale, massing, composition and design of these historic buildings would remain readily visible despite some interruption of views. The ability of the buildings to convey their historic significance would not be substantially impaired by the proposed Project. Therefore, indirect impacts to identified historic resources would be less than significant.

**Impact AES-1 b: If the project is in an urbanized area, would the project be consistent with applicable zoning and planning regulations governing scenic quality?**

As previously noted, the proposed Project is located entirely within a developed urban area containing commercial, residential, and industrial uses near major corridors.

**City General Plan**

The City’s General Plan includes the Land Use Element which identifies various goals and policies that indirectly address the City’s aesthetic objectives. The Land Use Element includes the following applicable goals:

- Goal 1:** Promote Inglewood’s image and identity as an independent community within the Los Angeles metropolitan area.
- Goal 2:** Improve the visual appearance and economic condition of the existing arterial commercial development along Inglewood’s major streets.

The Downtown TOD Plan in the Land Use Element contains the following goals:

- Goal 1:** Downtown is a place to live, work, shop, recreate, and be entertained.
- Goal 2:** Downtown is a revitalized yet forward-looking gathering place for the community.
- Goal 6:** Downtown expresses the unique culture of Inglewood.

The proposed Project would be consistent with the General Plan goals and policies by improving the general visual appearance of Inglewood through the incorporation of aesthetically pleasing architectural designs in the modern style for the guideway and stations. The structures of the ATS system, including the stations, guideway, MSF, and support facilities, would utilize transparent material where feasible and appropriate and neutral tones to better integrate the system into the existing surrounding community.

Unique Inglewood Historic Core elements may be incorporated to the extent provided for in the ITC Design Standards and Guidelines to further Downtown Inglewood’s expression of a unique culture. To ensure the consistency of the ATS system with the historic fabric of downtown and the General Plan Land Use Element the proposed amendment is included as part of the Project:

The new text shown as underlined is proposed to be added to the goal below in the “Circulation” subsection of the “Goals and Objectives” section:

- Policy 2.3: *Preservation of Historic Fabric*. Require the preservation of buildings that have been designated as historic and encourage the reuse of other historic buildings. Maintain the sense of place in areas with historic fabric and/or meaning such as Market Street between Regent Street and Hillcrest Avenue and the Hillcrest neighborhood east of Locust Street, while also accommodating for the development of the Inglewood Transit Connector along Market Street between Regent Street and Manchester Boulevard.

The incorporation of the underlined language would allow for the implementation of the proposed Project to be consistent with the existing General Plan.

For detailed consistency analysis of the Land Use goals and policies please see **Table 4.1-2: Scenic Quality Consistency with General Plan Land Use Element.**

**Table 4.1-2  
Scenic Quality Consistency with General Plan Land Use Element**

Goals and Policies	Project Consistency
<b>Goals and Policies added with 2016 Amendment</b>	
<b>Goal 1:</b> Downtown is a place to live, work, shop, recreate, and be entertained.	<b>Consistent.</b> The proposed Project would strengthen Downtown Inglewood for commercial and residential uses by increasing accessibility to the downtown from local activity centers and the regional light rail network. This increased transit accessibility would promote local economic development opportunities, and enhance Downtown’s retail, recreation, and entertainment offerings and range of housing and employment options. Implementation of the proposed Project would activate and complement development in the City, and enhance social cohesion, equity, and community resilience. The streetscape improvements proposed as part of the Project will improve the pedestrian character of Market Street in Downtown.
<b>Goal 2:</b> Downtown is a revitalized yet forward-looking gathering place for the community.	<b>Consistent.</b> The proposed Project would promote economic development opportunities in Downtown Inglewood and support the development of a revitalized Downtown that serves as a gathering place for residents and visitors by increasing transit accessibility.

Goals and Policies	Project Consistency
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**Policy 2.2:** Pedestrian Network. Enhance sidewalks, repurpose alleys and create mid-block passthroughs and internal courtyards to serve as pedestrian passageways and enjoyable public spaces.

**Consistent.** The proposed Project would maintain and enhance sidewalks around the stations and guideway which would enhance the pedestrian environment. Sidewalks would be enhanced and widened at necessary points adjacent to the support columns to meet Americans with Disabilities Act (ADA) pedestrian circulation requirements, including along Market Street. Street trees would be integrated into sidewalks and planted within the median beneath guideway support columns along Market Street and Manchester Boulevard. New enjoyable public spaces would be created such as plazas with integrated street furniture at each of the proposed stations that would be designed in accordance with the existing planning documents and the Design Standards and Guidelines.

**Policy 2.3:** Preservation of Historic Fabric. Require the preservation of buildings that have been designated as historic and encourage the reuse of other historic buildings. Maintain the sense of place in areas with historic fabric and/or meaning such as Market Street between Regent Street and Hillcrest Avenue and the Hillcrest neighborhood east of Locust Street.

**Consistent.** The proposed Project would result in less than significant impacts to historic buildings. For detailed analysis, please refer to **Section 4.4: Cultural Resources**. To properly incorporate the proposed Project into the existing historic fabric of Downtown Inglewood, the amendment to Policy 2.3 has been proposed to include the ATS system. With the incorporation of the GP amendment the proposed Project would be consistent with the GP Land Use Element.

Additionally, the Design Standards and Guidelines address the integration of the proposed Project into the historic character of the Downtown along Market Street. The guideway would have an integrated, clean design, with round columns. The underside of the guideway would be smooth, and color of the concrete would be neutral with accents achieved through lighting. The design standards and guidelines for the stations call for sleek, modern style with canopies to provide shade and allowing for natural ventilation and daylight.

**Goal 6:** Downtown expresses the unique culture of Inglewood.

**Consistent.** The Design Standards and Guidelines provide for a streetscape environment with complete streets and furnishings that help define street character. The sidewalks would be designed to be as wide as possible to facilitate the incorporation of street furniture.

Goals and Policies	Project Consistency
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**Goals and Policies**

**General**

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

**Consistent.** The proposed Project would incorporate elements unique to Downtown Inglewood to facilitate the promotion of Inglewood's image and identity as an independent and unique community. The proposed Project would provide an integrated gateway to various entertainment activities specific to the City. In addition, the ATS system would encourage and facilitate greater access to the City's activity centers, including SoFi Stadium, Forum, IBEC and Downtown Inglewood. These activity centers contribute to the City's status and identity as an entertainment destination within the Los Angeles metropolitan area.

**Commercial**

Improve the visual appearance and economic condition of the existing arterial commercial development along Inglewood's major streets.

**Consistent.** The proposed Project would be designed in accordance with the Design Standards and Guidelines and will enhance the visual appearance of the major streets containing the ATS system by including streetscape improvements including street trees, landscaping, and street furniture. The appearance of the ATS structure would be modern with transparent materials and a natural color scheme to create an appealing appearance. The color scheme is also chosen to help better integrate the ATS structure with the adjacent environment. The ATS system would facilitate movement of greater numbers of residents and visitors along major streets in the City, thereby having the potential to activate existing commercial corridors, particularly along Market Street.

Source: City of Inglewood General Plan, "Land Use Element" (2016).  
\*Proposed GP Amendment

**Transportation Corridor Overlay Zone**

The Transportation Corridor Overlay Zone (TC Overlay Zone) would apply to the Project area and components of the ATS including stations and support facilities including the MSF and the PDS substations within the Downtown TOD Plan and HPSP areas. The TC Overlay Zone would provide allowances for encroachment into areas that may be used for the ATS system for columns, support structures, and other ATS physical components, and establish height limits to accommodate for ATS structures. The TC Overlay Zone would provide a design review process unique to the TC Overlay Zone for the construction of the ATS system. The TC Overlay zone would take precedence over the requirements of the IMC in the event of a conflict. The TC Overlay Zone is a permissive zone and would not change or restrict the current underlying zoning of any parcel.

With the implementation of the TC Overlay zone, implementation of the ATS system would be consistent with the IMC and other local regulations.

#### ***Downtown TOD Plan and Design Guidelines***

Portions of the proposed Project are located in the Historic Core area designated by the Downtown TOD Plan. While the ITC Design Standards and Guidelines address the Project and will not alter or change the standards in the Downtown TOD Plan, the Design Standards and Guidelines were created to integrate all Project elements with the Historic Core area vision set forth in the Downtown TOD Plan. Additionally, the Design Standards and Guidelines require consideration of the Downtown TOD Plan guidelines during the refinement of the design of the Project.

The Project would be designed in accordance with the Design Standards and Guidelines and would help fulfill the relevant aesthetic goals and policies of the Downtown TOD Plan, as outlined in **Table 4.1-2**. For analysis of goals and policies relevant to land use plans and planning, please refer to **Section 4.9: Land Use and Planning**. As discussed above, the Downtown TOD Plan area includes the entire Market Street segment and a portion of the Manchester Boulevard segment from Market Street to Locust Street. Accordingly, streetscape design and street trees in these areas would complement the guidelines defined within the Downtown TOD Plan. Section 4.10 of the Downtown TOD Plan details the visual design guidelines for Historic Downtown which would be integrated into the design considerations of the proposed Project.

With the incorporation of the General Plan amendment described above, the required consideration of the Downtown TOD Plan guidelines into the ITC Design Standards and Guidelines, and the complementary design and modern style of the ATS system, the proposed Project would be consistent with the Downtown TOD Plan and Guidelines.

#### ***Hollywood Park Specific Plan***

The Design Standards and Guidelines, and resulting design of the proposed Project, would not obstruct the implementation of the HPSP policies related to visual character as shown in **Table 4.1-3: ITC Design Standards and Guidelines Consistency with the Hollywood Park Specific Plan** below. The HPSP includes visual guidelines and standards for the public right-of-way within the plan area, which includes areas north of Hardy Street along Prairie Avenue. The HPSP also provides integrated and coordinated landscape design guidelines for new development in areas subject to HPSP's Plot Plan Review process along the perimeter of the Plan area with the objective of promoting visual compatibility. Similar to the Design Standards and Guidelines' approach to the portions of the Project located in the Downtown TOD Plan area, while the Design Standards and Guidelines will govern construction of the Project and therefore control over any conflicting provisions contained in HPSP, the Design Standards and Guidelines were created to integrate the Project elements with the HPSP streetscape. Additionally, the Design Standards and Guidelines require consideration of the HPSP's design guidelines where applicable during the refinement of Project plans.

The foregoing will apply to the portions of the proposed Project adjacent to the HPSP area that are covered by the HPSP's Plot Plan Review process, including the portions of the ATS guideway, the Prairie Avenue/Hardy Street station, and various support structures and columns.

The Project also includes a proposed amendment to the HPSP to address any potential conflict or inconsistency with the HPSP that may result from the shift of one lane of Prairie Avenue thirty (30) feet into the existing setback area on the east side of Prairie Avenue in the HPSP area and the associated reconfiguration of the existing sidewalk, landscape and other improvements that would be affected. For example, the amendment would eliminate the requirement for a 30-foot setback along the western edge of the HPSP to allow zero-lot line development. Accordingly, future buildings and structures within the HPSP area adjacent to Prairie Avenue would be permitted to be built along the existing property line without requiring any additional setback along Prairie Avenue. The landscape area within the 30-foot setback area on Prairie Avenue along the western edge of the HPSP area will be reduced or eliminated in certain areas, as needed to accommodate the new street easement. With this amendment and the replacement of existing streetscape features and signs that will be affected by street improvements to Prairie Avenue, no significant effects on the visual character of the HPSP area as defined by the HPSP will result from the Project.

#### ***Inglewood Municipal Code***

For the portions of the ATS systems that are not in the Downtown TOD or the Hollywood Park Specific Plan, the ITC Design Standards and Guidelines would prevail over the IMC, though IMC provisions relating to streetscapes, landscapes and signage are incorporated as part of the design process.

#### **Tree Preservation**

The IMC Tree Preservation ordinance<sup>30</sup> recognizes the importance of both native and nonnative trees within the City for the many benefits they provide. Prior to removing or cutting a protected tree in the City, a permit must be obtained with the City's Parks, Recreation, and Library Services Department. All trees removed require replacement with like-size, like-kind trees or an equal value tree or trees as determined by the City's Mater Plan or the Parks, Recreation, and Library Services Department. Compliance with the IMC Section 12-110, Tree Preservation requirements would ensure consistency and compliance of the proposed Project to the existing policies and guidelines.

Additionally, the **PDF AES-2** is consistent with the tree replacement ordinance in the IMC and also requires avoidance of tree removal to the extent feasible along with additional measures pursuant to the CCP. Any and all trees removed would be replace in kind and the same location if at all possible and in a timely manner, if the replacement of the tree would not conflict with future construction activities of the proposed Project.

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<sup>30</sup> Inglewood, California, Municipal Code, Article 32, Section 12-110 (2012), Tree Preservation.

**Table 4.1-3  
ITC Design Standards and Guidelines Consistency with the Hollywood Park Specific Plan**

Principles and Goals	Project Consistency
<b>Design Guideline Checklist</b>	
<p>Pedestrian and vehicular circulation routes shall comply with all requirements of the Americans with Disabilities Act (ADA), and include one or more of the following design elements along all or a portion of all streets or pedestrian pathways: (1) pedestrian pathway includes a pattern, color, or paving material that is differentiated from surrounding landscaping or paved areas; (2) way-finding signage; (3) the streets and pathways are oriented such that they include verifiable lines of sight that would allow both pedestrians and vehicles to see any one or more of the following: (a) Stadium, (b) performance venue, casino, retail or residential gateway, or (c) Champion Plaza, Lake Park, Arroyo Park, or Bluff Park.</p>	<p><b>Consistent.</b> Pedestrian facilities along the guideway, and adjacent to stations adjacent to the HPSP area would be improved to comply with all ADA requirements. The passenger walkway would be made of a different paving material than those of the surrounding paved areas and way finding signage would be installed where appropriate. Passenger walkways to the east of the guideway and stations will provide lines of sight to the HPSP area and, depending on location, could include the Stadium, the performance venue and/or the retail or residential gateway.</p>
<p>The exterior entryways of buildings shall include one or more of the following: (1) a trim or border of a different color or material than other portions of the façade; (2) an integral porch; (3) an awning; (4) an articulated entryway offset from the immediately adjacent façade by not less than one foot; or (5) an arched opening.</p>	<p><b>Consistent.</b> The proposed Stations would incorporate distinguishing features, such as distinctive canopies that do not detract from the surroundings, that are generally consistent with the HPSP Design Guidelines</p>
<p>When using more than one material on a façade (except as a trim or offset portion of the façade or as an entry or window treatment), the variation in materials shall continue to all side and rear elevations that are visible from the front or corner lot line.</p>	<p><b>Consistent.</b> As defined in the ITC Design Standards and Guidelines, materials used on the stations would be neutral in tone and would include color accents only where appropriate. The façade of the stations would not be incompatible with the HPSP.</p>
<p>Each building shall include one or more of the following:</p> <ul style="list-style-type: none"> <li>- Entry or window trim/surrounds</li> <li>- Horizontal banding</li> <li>- Corner quoins</li> <li>- Balconies (supported, cantilevered or Juliet)</li> <li>- False, shuttered windows</li> <li>- Awnings</li> <li>- Change in material or color</li> </ul>	<p><b>Consistent.</b> Stations will be visibly compatible with the standards articulated in the HPSP Design Guidelines. Under the ITC Design Standards and Guidelines, stations will be identifiable, distinctive and streamlined.</p>
<p>Railings shall be constructed of wood, wrought iron, or other material, such as stucco, which is used to construct the façade or entry or window trim on the same building.</p>	<p><b>Consistent.</b> The materials chosen for station railings would be consistent with the other station materials as defined in the ITC Design Standards and Guidelines in a manner that is generally consistent with the HPSP Design Guidelines.</p>
<p>Exposed gutters and downspouts shall be colored or painted, and shall not be constructed of unpainted aluminum, copper, or zinc.</p>	<p><b>Consistent.</b> Exposed gutters along Prairie Avenue would be painted or colored as defined in the ITC Design Standards and Guidelines in a manner that is generally consistent with the HPSP Design Guidelines.</p>
<p>Stairs shall be constructed of the same material as the deck and landing.</p>	<p><b>Consistent.</b> Station stairs would be constructed of the same material as the deck and landing as defined in the ITC Design Standards and Guidelines in a manner that is generally consistent with the HPSP Design Guidelines.</p>
<p>Columns and posts shall be constructed of stone, stucco, or wood (or other material painted or molded to look like one of the allowed materials) and shall be not less than four inches in diameter if round, or four inches on each side if rectangular.</p>	<p><b>Consistent.</b> Columns and posts would be constructed of materials used elsewhere in the station as defined in the ITC Design Standards and Guidelines in a manner that is generally consistent with the HPSP Design Guidelines</p>

**PDF AES-2** also requires the Contractor to maintain any replacement trees for three years after the date of planting and provide a warranty for such trees for at least one additional year post maintenance. The contractor and the City would conduct an inspection of all replaced trees before the one-year warranty expires before the City accepts the tree. These requirements as described in **PDF AES-2** would further the goal of the City to protect and maintain City trees within its jurisdiction.

**Design Review Process**

The Public Works Director or his/her designee would, in consultation with the Planning Division Manager or his/her designee, have the authority to review each ITC system project for compliance with all applicable provisions of (i) the ITC Design Standards and Guidelines, (ii) all additional technical, aesthetic, and other specifications contained in the procurement document(s) for the applicable ITC system component(s), and (iii) all requirements of the Mitigation Monitoring and Reporting Program set forth in the ITC's Final Environmental Impact Report.

The Director of Public Works or her/his designee would in consultation with the Planning Division Manager or her/his designee have the ability to update and/or revise the ITC Design Standards and Guidelines from time to time to include, among other things, alternate technologies, new or updated ITC Design Standards and Guidelines, consistency determinations of ITC procurement document(s) and alternative mitigation measures that achieve a comparable level of mitigation and/or, clarifications of existing provisions. The Director of Public Works or her/his designee would have the final decision-making authority regarding the interpretation of the Design Guidelines should there be an appeal ability to Council. This design process is consistent with the IMC.

**Summary**

As described previously, the proposed Project would take into consideration and be consistent with visual and materials-related guidelines from plans governing adjacent areas in the Downtown TOD Plan and the HPSP areas, to the extent feasible and consistent with the Design Guidelines. An amendment to Policy 2.3 of the General Plan Land Use Element has been introduced to ensure consistency of the proposed Project with the City's General Plan. The amendment describes the incorporation and implementation of the ATS system into the historic fabric of the Inglewood historic core.

The TC Overlay Zone would also be implemented to accommodate for the ATS system and its related elements in the City. The introduction of the TC Overlay Zone would reduce the potential for the proposed Project to conflict with the IMC since the TC Overlay Zone implements the Design Guidelines and applies them to the construction of the ATS system and related components within the TC Overlay Zone. The TC Overlay Zone will not have any impacts on other, non-Project elements that fall within the TC Overlay Zone,

as those uses would continue to be governed by their existing, underlying zone and other provisions of the IMC.

With the implementation of the TC Overlay Zone and the amendment to the City's General Plan, the proposed Project would be generally consistent with existing zoning and planning regulations governing scenic quality. Therefore, impacts would be less than significant.

#### **Mitigation Measures**

No mitigation is required.

#### **Level of Significance**

The impacts associated with applicable zoning and planning regulations governing scenic quality would be less than significant.

**Impact AES-2: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

#### **Construction**

Under existing conditions, the area surrounding the proposed Project has a relatively high level of ambient lighting, particularly along Florence Avenue, Manchester Boulevard, and Prairie Avenue, as those streets are well-lit, active transportation corridors. Nighttime construction activities would add to the existing ambient light levels on and in the area surrounding the proposed Project for the duration of construction.

Over the course of the construction of the proposed Project, the length of workdays would vary with the level of activity fluctuating throughout any given day. This would influence the nighttime work hours in a day which would influence the amount of lighting required at a site for a given day. The daily duration of construction lighting would also vary based on the season, with the longest duration of construction lighting occurring during winter months, when there are fewer hours of daylight, and the shortest duration of construction lighting during the summer months, when there are the most hours of daylight. Nighttime lighting sources during construction would consist mainly of floodlights that would be focused on the work area. Security lighting could also be used on construction sites but would be focused on the Project alignment. Because this lighting is intended to light the Project alignment to allow for nighttime construction and to provide security to the site, it would tend to be directed away from nearby adjacent properties, reducing the potential for spillover lighting effects.

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. Prior to the start of construction, light plans and mitigation measures would be drafted in accordance with the standards for the City issued Construction

Permit. Temporary lighting at construction sites would be limited to the amount necessary to safely perform the required work and would be directed downwards and shielded to avoid light spillage. Placement and orientation of the portable lighting fixtures would be placed in a manner to avoid directing lights toward sensitive receptors, including vehicle drivers on the roadway. The placement, shielding, and direction of the lighting would be purposeful and reduce the illumination outside of the intended area to the extent possible. The limited time duration of lighting would also limit the amount of illumination impact on nearby uses to the extent feasible.

In the event where lighting is required near the edge of the construction area, light trespass shall not exceed one foot-candle above ambient light level as measured at any adjacent residential and transient properties as outlined in the CCP. This measure would ensure lighting does not extend outside of the limits of the construction site in any significant manner. To ensure safety, temporary sidewalks, and any sidewalk adjacent to construction activities would be illuminated to City Standards to protect public safety. The illumination would be equivalent to those of street lighting and would not significantly contribute to visual impacts through significant light spillage or glare.

In addition to minimizing light spill, the CCP would ensure sensitive receptors and motorists on public streets would not have direct views of construction light sources to limit potential effects of glare. Sound barriers and temporary construction barriers that would be built in the initial phase of project construction, and, as construction progresses, newly constructed intervening structures would also incrementally block light and obscure views of construction sites from nearby residences and local streets, further restricting the potential for spillover lighting as construction progresses.

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.

With the incorporation of the CCP measures the potential impact for construction lighting and glare on surrounding land uses and sensitive receptors would be reduced to the extent feasible. Lighting and glare impacts during construction would be less than significant.

#### **Operation**

##### **Market Street Segment**

The Market Street segment contains existing ambient lighting conditions typical for a highly developed urban setting. Sources of existing light in this segment include streetlights, vehicle headlights, traffic lights, and lighting from parking lots, offices, and storefronts. As described under existing conditions, there are no existing light sensitive uses on Market Street such as residential dwelling and hotels/motels. Existing sources of daytime and nighttime glare in the area include mostly headlights of traveling cars in the area.

**PDF AES-3** includes the lighting design standards in the Design Guidelines. These guidelines address lighting for station design, guideway and support structures, the MSF, and elevated passenger walkways as described below.

#### Market Street/Florence Avenue Station

The station would be located on a site at 300 Florence Avenue currently developed with a retail commercial center. Lighting at the station would include accent lighting, lighting for security placed on pedestrian paths, and interior lighting within the station. Canopy lighting at the station would utilize indirect accent lighting to avoid glare and light illumination on adjacent properties. Additional accent lighting at the station would be less prominent than the accent lighting on the canopy and be of lesser visual impact to surrounding uses. Pedestrian friendly lighting would be functional and placed in a manner to minimize negative impacts on adjacent property. Care in the placement of the lighting would further reduce light spillage and glare to nearby uses. Additionally, all lighting facilities at the station would be programmable and sensor controlled to conserve energy and allow control for various settings such as daytime, nighttime, and event lighting. These settings would further ensure lighting at the property would be actively controlled and contained, and the level of lighting would be appropriate for the time of the day or events held at the City as required by **PDF AES-3**. The station would occupy a site already illuminated by nighttime lighting; the impact of the station lighting would be less than significant.

#### ATS Guideway

The ATS Guideway may include lighting fixtures for accent lighting. The light fixtures would be concealed or minimally visible within the guideway structure by design. Care would be taken to place lighting in a manner to limit the illumination impact on adjacent properties and lighting would not be visible from the ground level per the Design Guidelines. The limited visibility of the lighting and lighting fixture would reduce the chance of glare to passersby and adjacent uses. Illumination of the surrounding uses would also be limited by the reduced visibility of the light source. The guideway material used would be non-glare to eliminate potential for introducing glare to the surrounding uses. Because of the manner in which the lighting and the light fixtures would be designed as required by **PDF AES-3**, and the use of non-glare materials, lighting, and glare impacts of the ATS Guideway would be less than significant to surrounding uses and passersby.

#### Surface Parking Lots

Surface parking lots in the Market Street segment would be provided at the Market Street/Florence Avenue Station and at the existing site. Functional security lighting for the sites would be provided to ensure safety of the lots. Street trees surrounding the parking lot would be provided for aesthetic purposes separating the parking stalls from sidewalks which would also limit light spillage to adjacent areas outside

of the parking lots and limit glare. All parking lots are located at sites with existing light sources such as streetlights and interior lighting from buildings. As such, the security lighting at surface parking lots would not have a significant impact on surrounding uses beyond the existing light sources. The light and glare impact of surface parking lot lighting would be less than significant.

#### Streetscape

Roadway lighting would follow the requirements of the City of Inglewood per the Design Guidelines and would, therefore, be comparable to existing lighting on the roadway and not contribute to additional light spillage or glare. Pedestrian lighting in this segment would be provided on sidewalks, in elevated passenger walkways, at public places, and in all pedestrian pathways under ATS guideway to ensure safety and security for pedestrians. Along primary circulation routes, light fixtures and incident light sources would provide an average of 3-foot candles to help pedestrians better distinguish color, size, and shape of their surroundings. The streetscape lighting would not significantly contribute to existing lighting at the Project area where existing lighting as described above is consistent with the level of lighting at a highly developed urban area. Therefore, lighting and glare impacts of roadway and street lighting in this segment would be less than significant.

#### Manchester Boulevard Segment

The Manchester Boulevard segment contains existing ambient lighting characteristic typical for a highly developed urban setting. Sources of existing light in this segment includes streetlights, vehicle headlights, traffic lights, and lighting from parking lots, offices, storefronts, and interior illumination from residences.

#### ATS Guideway

Similar to the Market Street segment, the ATS guideway may include accent lighting along the guideway. Care would be taken to place accent and functional lighting in a manner to limit the illumination impact on adjacent properties and lighting would not be visible from the ground level per the Design Guidelines. The limited visibility of the lighting and lighting fixtures would reduce the chance of glare to passersby and adjacent uses. Illumination of the surrounding uses would also be limited by the reduced visibility of the light source. The guideway material would be non-glare to eliminate potential for introducing glare to the surrounding uses.

Light sensitive receptors along this segment consist of the homes located on the north side of Manchester Boulevard between Manchester Drive and Osage Avenue. In addition to the design measures mentioned previously to avoid light spillage and glare to nearby uses, the guideway along the segment with residential uses would be positioned towards the south side of the guideway. The positioning of the guideway would allow approximately 30 feet between the closest residential buildings and the edge of the guideway. The

elevated guideway would also be substantially above the height of the residential home and the lighting would not be in direct line of sight of the residents at the ground level.

Overall, because of the manner in which the lighting and the light fixture would be designed, the non-glare exterior material of the guideway as required by **PDF AES-3**, and the positioning and height of the guideway, lighting, and glare impacts of the ATS Guideway on surrounding uses and sensitive receptors would be less than significant.

#### Maintenance Storage Facility

The MSF would be built on a site currently developed with a retail commercial center. Lighting would be provided and placed in a manner to limit light spillage and glare on the residential uses across Spruce Avenue from the proposed MSF site. The building entrances to the MSF site would be lit to maintain safety and security of workers and passersby and primary walkways, steps, or ramps along the pedestrian routes would also be illuminated per **PDF AES-3** and ITC Design Standards and Guidelines. Security lighting in the parking lot would also be installed to maintain the safety of staffs and visitors.

The MSF would be separated from adjacent uses by the public right of way where existing sources of ambient light and glare includes vehicles, streetlights, and light sources from the interior of other adjacent buildings, including the new Vons store located on the northwest portion of the site. Lighting used by the MSF is would not result in any substantial increase in the level of the existing lighting by surrounding uses. Additionally, street trees would surround the MSF site for aesthetic appeal on the sidewalks and would further obstruct the lighting associated with the MSF. Therefore, lighting and glare impacts from the MSF site on surrounding uses would be less than significant.

#### Streetscape

Similar to the Market Street segment, roadway lighting would follow the requirements of the City of Inglewood per the Design Guidelines and would, therefore, be comparable to existing lighting on the roadway and not contribute to additional light spillage or glare. Pedestrian lighting in this segment would be provided similarly to the Market Street segment with the same guidelines and design features. Therefore, lighting and glare impacts of roadway and street lighting in this segment would be less than significant.

#### Prairie Avenue Segment

The Prairie Avenue segment contains existing ambient lighting characteristic typical for a highly developed urban setting. Sources of existing light in this segment includes streetlights, vehicle headlights, traffic lights, and lighting from parking lots, offices, billboards, and storefronts, security lighting at construction sites, and interior illumination from residences and hotels.

#### Manchester Boulevard/Prairie Avenue Station and Prairie Avenue/Hardy Street Station

Similar to the Market Street/Florence Avenue station, lighting at the stations would include accent lighting, lighting for security placed on pedestrian paths, and interior lighting within the station. Canopy lighting at the station utilize indirect accent lighting to avoid glare and light illumination on adjacent properties. Additional accent lighting would at the station would be less prominent than the accent lighting on the canopy and be of lesser visual impact to surrounding uses. Pedestrian friendly lighting would be functional and placed in a manner to minimize negative impacts on adjacent property. Care in the placement of the lighting would further reduce light spillage and glare to nearby uses as required by **PDF AES-3**. Additionally, all lighting facilities at the station would be programmable and sensor controlled to conserve energy and allow control for various settings such as daytime, nighttime, and event lighting. These settings would further ensure lighting at the property would be actively controlled and contained, and the level of lighting would be appropriate for the time of the day or events held at the City.

#### ATS Guideway

Similar to the other segments, the ATS guideway may include accent lighting along the guideway. Care would be taken to place lighting in a manner to limit the illumination impact on adjacent properties and lighting would not be visible from the ground level in conformance with **PDF AES-3** from the Design Guidelines. The limited visibility of the lighting and lighting fixture would reduce the chance of glare to passersby and adjacent uses. Illumination of the surrounding uses would also be limited by the reduced visibility of the light source. The guideway material would be non-glare to eliminate potential for introducing glare to the surrounding uses.

Light sensitive receptors along this segment are residential homes located on the west side of Prairie Avenue just north of Buckthorn Street, a motel just north of Arbor Vitae Street, and a motel approximately 400 feet south of Arbor Vitae Street. However, in addition to the design measures mentioned previously to avoid light spillage and glare to nearby uses, the guideway would be substantially above the height of the sensitive receptors and the lighting would not be in direct line of sight of the residents at the ground level. The positioning of the guideway would allow approximately 10 feet between the closest sensitive receptor and the edge of the guideway.

Because of the manner in which the lighting and the light fixture would be designed, the non-glare exterior material to be used, and the height of the guideway, lighting, and glare impacts of the ATS Guideway would be less than significant to surrounding uses and sensitive receptors.

### Streetscape

Roadway lighting would follow the requirements of the City of Inglewood per the Design Guidelines and would, therefore, be comparable to existing lighting on the roadway and not contribute to additional light spillage or glare. Pedestrian lighting in this segment would be provided on sidewalks, in elevated passenger walkways, at public places, and in all pedestrian pathways under ATS guideways to ensure safety and security for pedestrians. Along primary circulation routes, light fixtures and incident light sources would provide an average of 3-foot candles to help pedestrians better distinguish color, size, and shape of their surroundings. The streetscape lighting would not significantly contribute to existing lighting at the Project area where existing lighting as described above is consistent with the level of lighting at a highly developed urban area. Therefore, lighting and glare impacts of roadway and street lighting in this segment would be less than significant.

### Summary

Overall, light and glare impacts would be less than significant with the incorporation of CCP measures during construction, incorporation of **PDF AES-3**, compliance with the Design Guidelines. As discussed, the Project is proposed within a highly developed neighborhood with high levels of existing ambient lighting. Measures outlined in the CCP would limit light spillage and glare onto adjacent uses through the use of downward directed and shielded lighting and positioning the lighting in a manner that limits the illumination of light outside of the construction area. Construction lighting plans, which would comply with the CCP mitigation measures be developed prior to construction. Any light trespass outside of the construction site would be limited to one foot-candle above light level as measured at any adjacent residential and transient properties, thereby limiting the potential exposure to light spillage of any construction site adjacent uses to a less than significant level.

**PDF AES-3** and Design Guidelines would require ATS system lighting to be positioned in a manner to minimize negative impacts to adjacent properties. Lighting at the station would be programmable to allow adjustments for the best use of the lighting at any specific time of the day or event in the City. Accent lighting fixtures on the ATS guideway would be hidden by project design to the extent feasible in order to minimize light spillage and glare from lighting used at the system. As shown from the analysis discussed, surface parking lot lighting and street lighting are anticipated to be comparable to the level of lighting currently provided by the City on its roadways and sidewalks. Therefore, light and glare impact during operation to the surrounding land uses would be less than significant.

### Mitigation Measures

No Mitigation Measures Needed.

### Level of Significance

The impacts associated with light and glare would be less than significant.

#### **4.1.8 CUMULATIVE IMPACTS**

##### **4.1.8.1 Visual Character**

Overall, the components of the proposed ITC Project, including the ATS guideway, stations, and MSF and associated Project Design Features, designed in accordance with the Design Guidelines, would not adversely affect the visual character of the surrounding areas. The ITC facilities will be designed in a modern style with a neutral tone and transparent materials wherever feasible. The color scheme and transparent materials would result in an appealing appearance while integrating the components of the ATS system into its surroundings. The design of these new transportation facilities would also complement existing and future surrounding development as discussed above. The proposed Project would complement its present and future surroundings and would not contribute significant impacts on the visual character of the areas located along the proposed alignment.

The proposed Project would also have a less than significant impact on the visual character of the historical buildings located along the proposed alignment area.

The City is currently planning to build a parking structure, containing up to 2,500 spaces in six-level structure, on the City's Inglewood Transit Facility (ITF) site located on the southeast corner of Prairie Avenue and Arbor Vitae Street. This new structure would replace the existing ITF on this site, which is an improved surface parking lot. The Project includes the proposed relocation of one travel lane on Prairie Avenue east into the existing setback area along Prairie Avenue. This component of the Project would impact existing streetscape improvements on the east side of Prairie Avenue including sidewalk, landscaping, and other improvements in the HPSP area. These improvements would be replaced as part of the Prairie Avenue street improvements. Together, this new parking structure and the proposed street improvements would change the existing visual character of the eastern side of Prairie Avenue. These improvements would be designed in a manner that is compatible with the existing improvements on Prairie Avenue and existing and planned development in the HPSP area and no cumulative impact on the visual character of the HPSP area would result.

For these reasons, implementation of the Project would not contribute to any significant impact on the visual character of the areas located along the proposed alignment.

##### **4.1.8.2 Lighting and Glare**

Temporary lighting associated with construction of the proposed Project would be less than significant. This lighting would be temporary in nature and with the incorporation of requirements in the CCP would

be less than significant. Nearby construction projects such as the HPSP would also introduce construction lighting near the site. However, the increase in ambient nighttime lighting levels in these areas would only rise minimally because a significant amount of ambient lighting currently exists due to the urbanized nature of the Project area as a whole. Additionally, construction activities on Prairie Avenue for the proposed Project is anticipated to take place from the year 2024 to 2027 which would coincide with the end of the construction of the HPSP development which anticipates completion of construction by 2025. Cumulative impacts from nighttime lighting would be reduced as the HPSP development completes its construction as the proposed Project continues construction in the Prairie Avenue segment.

Operationally, cumulative lighting impacts would be less than significant as the HPSP development would reduce lighting and glare impacts from the site's previous use as determined by HPSP's EIR and the proposed Project would have a less than significant impact overall impact on lighting and glare. Both the Project and HPSP projects would utilize non-glare and non-reflective exterior materials for the proposed structures and would not contribute to glare of the surrounding area.

Therefore, no significant cumulative lighting impacts are expected and the Project's contribution would not be cumulatively significant. The Project's incremental impact associated with ambient nighttime lighting and glare effects would not be cumulatively considerable.

#### 4.1.9 CONSISTENCY WITH CITY GENERAL PLAN

As noted under **Impact AES-1b**, the proposed Project does not conflict with the City's General Plan.

## 4.2 AIR QUALITY

### 4.2.1 INTRODUCTION

This section of the Recirculated Draft Environmental Impact Report (Recirculated Draft EIR) examines air quality emissions that would result from construction and operations associated with the proposed Inglewood Transit Connector Project (proposed Project or ITC Project).

The proposed Project would relieve traffic congestion within the Project area and the surrounding street network; improve access options and the travel experience for passengers to the City of Inglewood (City)'s major activity centers and provide a connection to the regional Los Angeles County Metropolitan Transportation Authority (Metro) rail system. The proposed Project includes an Automated Transit System (ATS) train, which would provide access to the City's major activity centers, including The Forum, the Los Angeles Sports and Entertainment District (LASED) including SoFi Stadium, and the Inglewood Basketball and Entertainment Center (IBEC) including the Intuit Dome. The ATS trains would transport passengers between the Metro rail system and the City's activity centers. Air quality emissions were analyzed using a variety of modeling techniques and are detailed within the following appendices to this Recirculated Draft EIR:

- *Air Quality and Heath Risk Assessment Technical Report for the Inglewood Transit Connector Project*, Meridian Consultants LLC, September 2021 (**Appendix G.1**)
- *Vons Replacement CalEEMod Output Sheets*, Meridian Consultants LLC, October 2021 (**Appendix G.2**)

Prior to the preparation of the December 2020 Draft EIR, a recirculated Initial Study (included as **Appendix A.2** of this Recirculated Draft EIR) was prepared to assess potential environmental impacts associated with air quality. For one of these impacts, the Initial Study found that the proposed Project would have a less than significant impact, thus, no further analysis of this topic is required in this EIR. The Initial Study concluded:

- Potential impacts related to objectionable odors affecting a substantial number of people were evaluated and determined to have a less than significant impact. Though the proposed Project may produce discernable odors during construction, these odors would decrease, dilute, and become unnoticeable. Moreover, operation of the proposed Project would not include any odor producing land uses.

After circulation of the December 2020 Draft EIR for public review, the City revised the design of the proposed Project in response to consultation with key stakeholders in the community and comments received on the December 2020 Draft EIR. Specific changes to the proposed Project include raising the height of the ATS guideway along Market Street to preserve existing views of historic buildings, relocating

#### 4.2 Air Quality

the Prairie Avenue/Pincay Drive Station to the southwest corner of Prairie Avenue and Manchester Boulevard, redesign of the proposed MSF to allow this facility to be located on the proposed site with a new Vons store, and realignment of the guideway and stations on Prairie Avenue to the west side of Prairie Avenue.

Additionally, the construction phasing plan has been refined. As it relates to air quality impacts, these changes include updated construction and operational details which resulted in reductions of air quality emissions compared to the December 2020 Draft EIR. Moreover, the previous significant and unavoidable impact related to construction emissions disclosed in the December 2020 Draft EIR has been reduced to a less than significant impact with mitigation incorporated.

These changes to the design of the proposed Project do not create the potential for significant impacts related to objectionable odors affecting a substantial number of people.

Other impacts found to be less than significant are further discussed in **Section 6.4: Effects Found Not to Be Significant**.

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Recirculated Draft EIR.

#### 4.2.2 OVERVIEW OF AIR QUALITY

The proposed Project is located within the South Coast Air Basin (Basin), named so because its geographical formation is that of a basin, with the surrounding mountains trapping the air and pollutants in the valleys below. The Basin includes all of Orange County and the non-desert portions of Los Angeles, San Bernardino, and Riverside Counties. The regional climate within the Basin is considered to be semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality within the Basin is primarily influenced by a wide range of emissions sources—such as dense population centers, heavy vehicular traffic, industry, and weather.

Air pollutant emissions within the Basin are generated by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point sources and area sources. Point sources occur at an identified location and are usually associated with manufacturing and industry. Examples of point sources are boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and produce many small emissions. Examples of area sources include residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and consumer products, such as barbecue lighter fluid and hair spray. Mobile sources are emissions from motor vehicles,

#### 4.2 Air Quality

including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircrafts, ships, trains, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment, such as when fine dust particles are pulled off the ground surface and suspended in the air during high winds.

The United States Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) designate air basins where air pollution levels exceed the State or federal ambient air quality standards (AAQS) as “nonattainment” areas. These pollutants are referred to as “criteria air pollutants” as a result of the specific standards, or criteria, that have been adopted for them. The federal and State standards have been set at levels considered safe to protect public health, including the health of “sensitive” populations, such as asthmatics, children, and the elderly with a margin of safety; and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. If standards are met, the area is designated as an “attainment” area. If there is inadequate or inconclusive data to make a definitive attainment designation, an area is considered “unclassified.” Federal nonattainment areas are further designated as marginal, moderate, serious, severe, or extreme as a function of deviation from standards. Transportation conformity for nonattainment and maintenance areas is required under the federal Clean Air Act (CAA) to ensure federally supported highway and transit projects conform to the State Implementation Plan (SIP). The USEPA approved California’s SIP revisions for attainment of the 1997 8-hour ozone (O<sub>3</sub>) National AAQS for the Basin in October 2019.

Ambient air pollution can cause public health concerns and can contribute to increases in respiratory illness and death rates. Air pollution can affect the health of both adults and children. The adverse health effects associated with air pollution are diverse and include cardiovascular effects, premature mortality, respiratory effects, cancer, reproductive effects, neurological effects, and other health outcomes.<sup>1</sup>

#### 4.2.2.1 Criteria Air Pollutants

The criteria air pollutants that are most relevant to current air quality planning and regulation in the Basin include ozone (O<sub>3</sub>), carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), respirable particulate matter (PM<sub>10</sub>), fine particulate matter (PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), and lead (Pb). In addition, volatile organic compounds (VOC) and toxics air contaminants (TACs) are a concern in the Basin but are not classified under AAQS. The characteristics of each of these pollutants are briefly described below.

<sup>1</sup> South Coast Air Quality Management District (SCAQMD), 2016 Air Quality Management Plan, *Appendix I: Health Effects (March 2017)*, <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-i.pdf?sfvrsn=14>. Accessed September 2021.

**Ozone (O<sub>3</sub>)**

Ozone is a highly reactive and unstable gas that is formed when reactive organic gases (ROGs), sometimes referred to as VOCs, and nitrogen oxides (NOx), byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant.

**Carbon Monoxide (CO)**

CO is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. Carbon monoxide concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because carbon monoxide is emitted directly from internal combustion engines, unlike ozone, motor vehicles operating at slow speeds are the primary source of carbon monoxide in the Basin. The highest ambient carbon monoxide concentrations are generally found near congested transportation corridors and intersections.

**Nitrogen Dioxide (NO<sub>2</sub>)**

NO<sub>2</sub> is a reddish-brown, highly reactive gas that is formed in the ambient air through the oxidation of nitric oxide (NO), similar to O<sub>3</sub>. NO<sub>2</sub> is also a byproduct of fuel combustion. NO and NO<sub>2</sub> are collectively referred to as NOx and are major contributors to O<sub>3</sub> formation. NO<sub>2</sub> also contributes to the formation of PM<sub>10</sub>.

**Particulate Matter (PM<sub>10</sub>) and Fine Particulate Matter (PM<sub>2.5</sub>)**

Particulate Matter (PM) consists of small liquid and solid particles floating in the air, including smoke, soot, dust, salts, acids, and metals and can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Sources of PM<sub>10</sub> emissions include dust from construction sites, landfills and agriculture, wildfires and brush/waste burning, industrial sources, and wind-blown dust from open lands.<sup>2</sup> Sources of PM<sub>2.5</sub> emissions include combustion of gasoline, oil, diesel fuel, or wood. PM<sub>10</sub> and PM<sub>2.5</sub> may be either directly emitted from sources (primary particles) or formed in the atmosphere through chemical reactions of gases (secondary particles) such as SO<sub>2</sub>, NOx, and certain organic compounds.

**Sulfur Dioxide (SO<sub>2</sub>)**

SO<sub>2</sub> is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal, as well as from chemical processes occurring at

<sup>2</sup> California Air Resources Board, *Inhalable Particulate Matter and Health (PM<sub>2.5</sub> and PM<sub>10</sub>)*, <https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm>. Accessed September 2021.

chemical plants and refineries. When SO<sub>2</sub> oxidizes in the atmosphere, it forms sulfates (SO<sub>4</sub>). Collectively, these pollutants are referred to as sulfur oxides (SOx).

**Lead (Pb)**

Lead occurs in the atmosphere as particulate matter and is also considered a TAC. The combustion of leaded gasoline is the primary source of airborne lead in the Basin. The use of leaded gasoline is no longer permitted for on-road motor vehicles, so the majority of such combustion emissions are associated with off-road vehicles. However, because leaded gasoline was emitted in large amounts from vehicles when leaded gasoline was used for on-road motor vehicles, lead is present in many urban soils and can be resuspended in the air. Other sources of lead include the manufacturing and recycling of batteries, paint, ink, ceramics, ammunition, and the use of secondary lead smelters. While the South Coast Air Quality Management District (SCAQMD) CEQA Air Quality Handbook contains numerical indicators of significance for lead, project construction and operation would not include sources of lead emissions and would not exceed the numerical indicators for lead. Unleaded fuel and unleaded paints have virtually eliminated lead emissions from infrastructure projects.

**Volatile Organic Compounds (VOCs)**

VOCs include any compound of carbon, excluding CO, carbon dioxide (CO<sub>2</sub>), carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions and thus, a precursor of ozone formation. VOC emissions often result from the evaporation of solvents in architectural coatings. Reactive organic gases are any reactive compounds of carbon, excluding methane, CO, CO<sub>2</sub> carbonic acid, metallic carbides or carbonates, ammonium carbonate, and other exempt compounds. ROG emissions are generated from the exhaust of mobile sources.<sup>3</sup> Both VOCs and ROGs are precursors to ozone and the terms can be used interchangeably.<sup>4</sup>

**Toxic Air Contaminants (TACs)**

TACs refer to a diverse group of “non-criteria” air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed previously, but because their effects tend to be local rather than regional. TACs are classified as carcinogenic and noncarcinogenic, where carcinogenic TACs can cause

<sup>3</sup> SCAQMD, Appendix A: Calculation Details for CalEEMod (October 2017), [http://www.aqmd.gov/docs/default-source/caleemod/02\\_appendix-a2016-3-2.pdf?sfvrsn=6](http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6). Accessed September 2021.

<sup>4</sup> Both VOC and ROGs are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For the purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.

cancer and noncarcinogenic TACs can cause acute and chronic impacts to different target organ systems (e.g., eyes, respiratory, reproductive, developmental, nervous, and cardiovascular).

CARB and the Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or “listed,” as a TAC in California.<sup>5</sup> Diesel Particulate Matter (DPM), which is emitted in the exhaust from diesel engines, was listed by the State as a TAC in 1998. DPM has historically been used as a surrogate measure of exposure for all diesel exhaust emissions. DPM consists of fine particles (fine particles have a diameter less than 2.5 micrometer [ $\mu\text{m}$ ]), including a subgroup of ultrafine particles (ultrafine particles have a diameter less than 0.1  $\mu\text{m}$ ). Collectively, these particles have a large surface area, which makes them an excellent medium for absorbing organics. The visible emissions in diesel exhaust include carbon particles or “soot.” Diesel exhaust also contains a variety of harmful gases and cancer-causing substances.

#### 4.2.2.2 Health Effects of Pollutants

Elevated concentrations of certain air pollutants in the atmosphere have been recognized to cause health problems and consequential damage to the environment either directly or in reaction with other pollutants. In the United States, such pollutants have been identified and are regulated as part of the overall endeavor to prevent further deterioration and facilitate improvement in air quality. The following pollutants are regulated by the USEPA and are subject to emissions control requirements adopted by federal, State, and local regulatory agencies. These pollutants are referred to as “criteria air pollutants” as a result of the specific standards, or criteria, which have been adopted pertaining to them.

The EPA established the National Ambient Air Quality Standards (NAAQS) to “provide public health protection, including protecting the health of ‘sensitive’ populations such as asthmatics, children, and the elderly,” allowing “an adequate margin of safety.” California Ambient Air Quality Standards (CAAQS) were “established to protect the health of the most sensitive groups in our communities” and “defines the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without any harmful effects on people or the environment.”<sup>6</sup>

#### Ozone

According to the USEPA, ozone can cause the muscles in the airways to constrict potentially leading to wheezing and shortness of breath. Ozone can make it more difficult to breathe deeply and vigorously; cause shortness of breath and pain when taking a deep breath; cause coughing and sore or scratchy throat;

<sup>5</sup> The complete list of such substances is located at <https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants>.

<sup>6</sup> California Air Resources Board, California Ambient Air Quality Standards, <https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards>. Accessed September 2021.

inflammation and damage the airways; aggravate lung diseases such as asthma, emphysema, and chronic bronchitis; increase the frequency of asthma attacks; make the lungs more susceptible to infection; continue to damage the lungs even when the symptoms have disappeared; and cause chronic obstructive pulmonary disease.<sup>7</sup>

Long-term exposure to ozone is linked to aggravation of asthma and is likely to be one of many causes of asthma development. Long-term exposures to higher concentrations of ozone may also be linked to permanent lung damage, such as abnormal lung development in children.<sup>8</sup> According to CARB, inhalation of ozone causes inflammation and irritation of the tissues lining human airways, causing and worsening a variety of symptoms, and exposure to ozone can reduce the volume of air that the lungs breathe in and cause shortness of breath.<sup>9</sup>

The USEPA states that people most at risk from breathing air containing ozone include people with asthma, children, older adults, and people who are active outdoors, especially outdoor workers.<sup>10</sup> Children are at greatest risk from exposure to ozone because their lungs are still developing and they are more likely to be active outdoors when ozone levels are high, which increases their exposure.<sup>11</sup> According to CARB, studies show that children are no more or less likely to suffer harmful effects than adults; however, children and teens may be more susceptible to ozone and other pollutants because they spend nearly twice as much time outdoors and engaged in vigorous activities compared to adults.<sup>12</sup> Children breathe more rapidly than adults and inhale more pollution per pound of their body weight than adults and are less likely than adults to notice their own symptoms and avoid harmful exposures. Further research may be able to better distinguish between health effects in children and adults.

#### Nitrogen Dioxide (NO<sub>2</sub>) and Nitrogen Oxides (NO<sub>x</sub>)

According to the USEPA, short-term exposures to NO<sub>2</sub> can potentially aggravate respiratory diseases, particularly asthma, leading to respiratory symptoms (such as coughing, wheezing or difficulty breathing), hospital admissions and visits to emergency rooms. Longer exposures to elevated concentrations of NO<sub>2</sub> may contribute to the development of asthma and potentially increase susceptibility to respiratory

<sup>7</sup> US Environmental Protection Agency, *Health Effects of Ozone Pollution*, <https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution>. Accessed September 2021.

<sup>8</sup> US Environmental Protection Agency, *Health Effects of Ozone Pollution*, <https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution>. Accessed September 2021.

<sup>9</sup> California Air Resources Board, *Ozone & Health, Health Effects of Ozone*, <https://ww2.arb.ca.gov/resources/ozone-and-health>. Accessed September 2021.

<sup>10</sup> US Environmental Protection Agency, *Health Effects of Ozone Pollution*, <https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution>. Accessed September 2021.

<sup>11</sup> US Environmental Protection Agency, *Health Effects of Ozone Pollution*, <https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution>. Accessed September 2021.

<sup>12</sup> California Air Resources Board, *Ozone & Health, Health Effects of Ozone*, <https://ww2.arb.ca.gov/resources/ozone-and-health>. Accessed September 2021.

infections. According to CARB, controlled human exposure studies that show that NO<sub>2</sub> exposure can intensify responses to allergens in allergic asthmatics.<sup>13</sup>

In addition, a number of epidemiological studies have demonstrated associations between NO<sub>2</sub> exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses.<sup>14</sup> Infants and children are particularly at risk from exposure to NO<sub>2</sub> because they have disproportionately higher exposure to NO<sub>2</sub> than adults due to their greater breathing rate for their body weight and their typically greater outdoor exposure duration while in adults, the greatest risk is to people who have chronic respiratory diseases, such as asthma and chronic obstructive pulmonary disease.

CARB states that much of the information on distribution in air, human exposure and dose, and health effects is specifically for NO<sub>2</sub> and there is only limited information for NO and NO<sub>x</sub>, as well as large uncertainty in relating health effects to NO or NO<sub>x</sub> exposure.<sup>15</sup>

### **Carbon Monoxide (CO)**

According to the USEPA, breathing air with a high concentration of CO reduces the amount of oxygen that can be transported in the blood stream to critical organs like the heart and brain and at very high levels, which are possible indoors or in other enclosed environments, CO can cause dizziness, confusion, unconsciousness and death.<sup>16</sup> Very high levels of CO are not likely to occur outdoors; however, when CO levels are elevated outdoors, they can be of particular concern for people with some types of heart disease since these people already have a reduced ability for getting oxygenated blood to their hearts and are especially vulnerable to the effects of CO when exercising or under increased stress. In these situations, short-term exposure to elevated CO may result in reduced oxygen to the heart accompanied by chest pain also known as angina.

According to CARB, the most common effects of CO exposure are fatigue, headaches, confusion, and dizziness due to inadequate oxygen delivery to the brain.<sup>17</sup> For people with cardiovascular disease, short-term CO exposure can further reduce their body's already compromised ability to respond to the increased oxygen demands of exercise, exertion, or stress; inadequate oxygen delivery to the heart muscle leads to chest pain and decreased exercise tolerance. Unborn babies, infants, elderly people, and people with

13 California Air Resources Board, *Nitrogen Dioxide & Health*, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>. Accessed September 2021.

14 California Air Resources Board, *Nitrogen Dioxide & Health*, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>. Accessed September 2021.

15 California Air Resources Board, *Nitrogen Dioxide & Health*, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>.

16 US Environmental Protection Agency, *Carbon Monoxide (CO) Pollution in Outdoor Air*, <https://www.epa.gov/co-pollution/basic-information-about-carbon-monoxide-co-outdoor-air-pollution>, Accessed September 2021.

17 California Air Resources Board, *Carbon Monoxide & Health*, <https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health>. Accessed September 2021.

anemia or with a history of heart or respiratory disease are most likely to experience health effects with exposure to elevated levels of CO.

### **Sulfur Dioxide (SO<sub>2</sub>)**

According to the USEPA, short-term exposures to SO<sub>2</sub> can harm the human respiratory system and make breathing difficult.<sup>18</sup> According to CARB, health effects at levels near the State one-hour standard are those of asthma exacerbation, including bronchoconstriction accompanied by symptoms of respiratory irritation such as wheezing, shortness of breath and chest tightness, especially during exercise or physical activity and exposure at elevated levels of SO<sub>2</sub> (above 1 parts per million [ppm]) results in increased incidence of pulmonary symptoms and disease, decreased pulmonary function, and increased risk of mortality.<sup>19</sup> Children, the elderly, and those with asthma, cardiovascular disease, or chronic lung disease (such as bronchitis or emphysema) are most likely to experience the adverse effects of SO<sub>2</sub>.<sup>20,21</sup>

### **Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>)**

According to CARB, both PM<sub>10</sub> and PM<sub>2.5</sub> can be inhaled, with some depositing throughout the airways; PM<sub>10</sub> is more likely to deposit on the surfaces of the larger airways of the upper region of the lung, while PM<sub>2.5</sub> is more likely to travel into and deposit on the surface of the deeper parts of the lung, which can induce tissue damage, and lung inflammation.<sup>22</sup> Short-term (up to 24 hours duration) exposure to PM<sub>10</sub> has been associated primarily with worsening of respiratory diseases, including asthma and chronic obstructive pulmonary disease, leading to hospitalization and emergency department visits. The effects of long-term (months or years) exposure to PM<sub>10</sub> are less clear, although studies suggest a link between long-term PM<sub>10</sub> exposure and respiratory mortality. The International Agency for Research on Cancer published a review in 2015 that concluded that particulate matter in outdoor air pollution causes lung cancer.

Short-term exposure to PM<sub>2.5</sub> has been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. Long-term exposure to PM<sub>2.5</sub> has been linked to premature death, particularly in people who have chronic heart or lung diseases, and reduced lung

18 US Environmental Protection Agency, *Sulfur Dioxide (SO<sub>2</sub>) Pollution*, <https://www.epa.gov/so2-pollution/sulfur-dioxide-basics>. Accessed September 2021.

19 California Air Resources Board, *Sulfur Dioxide & Health*, <https://ww2.arb.ca.gov/resources/sulfur-dioxide-and-health>. Accessed September 2021.

20 California Air Resources Board, *Sulfur Dioxide & Health*, <https://ww2.arb.ca.gov/resources/sulfur-dioxide-and-health>. Accessed September 2021.

21 US Environmental Protection Agency, *Sulfur Dioxide (SO<sub>2</sub>) Pollution*.

22 California Air Resources Board, *Inhalable Particulate Matter and Health (PM<sub>2.5</sub> and PM<sub>10</sub>)*, <https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm>. Accessed September 2021.

function growth in children.<sup>23</sup> According to CARB, populations most likely to experience adverse health effects with exposure to PM<sub>10</sub> and PM<sub>2.5</sub> include older adults with chronic heart or lung disease, children, and asthmatics. Children and infants are more susceptible to harm from inhaling pollutants such as PM<sub>10</sub> and PM<sub>2.5</sub> compared to healthy adults because they inhale more air per pound of body weight than do adults, spend more time outdoors, and have developing immune systems.

### Lead (Pb)

Lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and the cardiovascular system, and affects the oxygen carrying capacity of blood. The lead effects most commonly encountered in current populations are neurological effects in children, such as behavioral problems and reduced intelligence, anemia, and liver or kidney damage.<sup>24</sup> Excessive lead exposure in adults can cause reproductive problems in men and women, high blood pressure, kidney disease, digestive problems, nerve disorders, memory and concentration problems, and muscle and joint pain.

### Toxic Air Contaminants

Toxic Air Contaminants (TACs) are defined as those contaminants that are known or suspected to cause serious health problems, but do not have a corresponding ambient air quality standard. TACs are also defined as an air pollutant that may increase a person's risk of developing cancer and/or other serious health effects. TACs are emitted by a variety of industrial processes such as petroleum refining, electric utility and chrome plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust. TACs may exist as PM<sub>10</sub> and PM<sub>2.5</sub> or as vapors (gases). TACs include metals, other particles, gases absorbed by particles, and certain vapors from fuels and other sources. The emission of a TAC does not automatically create a health hazard. Other factors, such as the amount of the TAC, its toxicity, how it is released into the air, the weather, and the terrain, all influence whether the emission could be hazardous to human health. Emissions of TACs into the air can be damaging to human health and to the environment. Human exposure to TACs at sufficient concentrations and durations can result in cancer, poisoning, and rapid onset of sickness, such as nausea or difficulty in breathing. Other less measurable effects include immunological, neurological, reproductive, developmental, and respiratory problems. TACs deposited onto soil or into lakes and streams affect ecological systems and eventually human health through consumption of contaminated food. The carcinogenic potential of TACs is a

23 California Air Resources Board, *Inhalable Particulate Matter and Health (PM<sub>2.5</sub> and PM<sub>10</sub>)*, <https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm>. Accessed September 2021.

24 California Air Resources Board, *Lead & Health*, <https://www2.arb.ca.gov/resources/lead-and-health>. Accessed September 2021.

particular public health concern because many scientists currently believe that there is no "safe" level of exposure to carcinogens. Any exposure to a carcinogen poses some risk of contracting cancer.<sup>25</sup>

The public's exposure to TACs is a significant public health issue in California. In the wake of publicity surrounding planned and unplanned releases of toxic chemicals into the atmosphere, the Air Toxics "Hotspots" Information and Assessment Act was enacted in September 1987 and is a State law requiring facilities to report emissions of TACs to air districts.<sup>26</sup> The program is designed to quantify the amounts of potential TACs released, the location of the release, the concentrations to which the public is exposed, and the resulting health risks. The State Air Toxics Program (AB 2588) identified over 200 TACs, including the 188 TACs identified in the CAA.<sup>27</sup>

The USEPA has assessed this expansive list and identified 21 TACs as Mobile Source Air Toxics (MSATs).<sup>28</sup> MSATs are compounds emitted from highway vehicles and nonroad equipment. Some toxic compounds are present in fuel and are emitted to the air when the fuel evaporates or passes through the engine unburned. Other toxics are emitted from the incomplete combustion of fuels or as secondary combustion products. Metal air toxics also result from engine wear or from impurities in oil or gasoline. USEPA also extracted a subset of these 21 MSAT compounds that it now labels as the nine priority MSATs: 1,3-butadiene, acetaldehyde, acrolein, benzene, diesel particulate matter (DPM)/diesel exhaust organic gases, ethylbenzene, naphthalene, and polycyclic organic matter (POM). While these nine MSATs are considered the priority transportation toxics, USEPA stresses that the lists are subject to change and may be adjusted in future rules.<sup>29</sup>

### Diesel Exhaust

According to the California Almanac of Emissions and Air Quality, the majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being particulate matter from the exhaust of diesel-fueled engines (i.e., DPM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances).

Diesel exhaust is composed of two phases, gas and particle, and both phases contribute to the health risk. The gas phase is composed of many of the urban TACs, such as acetaldehyde, acrolein, benzene, 1,3-

25 US Environmental Protection Agency, *Hazardous Air Pollutants*, <https://www.epa.gov/haps>. Accessed September 2021.

26 California Air Resources Board, General Information About "Hot Spots." <https://www.arb.ca.gov/ab2588/general.htm>. Accessed September 2021.

27 California Air Resources Board. AB 25188 Air Toxics "Hot Spots" Program. <https://www.arb.ca.gov/ab2588/ab2588.htm>. Accessed September 2021.

28 US Environmental Protection Agency, *Air Toxics Risk Assessment Reference Library, Volume 1 Technical Resource Manual*. April 2004.

29 US Department of Transportation Federal Highway Administration, 2016. Updated Interim Guidance on Mobile Source Air Toxic Analysis in NEPA Documents. October 18, 2016.

butadiene, formaldehyde, and polycyclic aromatic hydrocarbons. The particle phase is also composed of many different types of particles by size or composition. Fine and ultra-fine diesel particulates are of the greatest health concern and may be composed of elemental carbon with adsorbed compounds such as organic compounds, sulfate, nitrate, metals, and other trace elements. Diesel exhaust is emitted from a broad range of diesel engines; the on-road diesel engines of trucks, buses and cars and the off-road diesel engines that include locomotives, marine vessels, and heavy-duty equipment. Although DPM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emission control system is present.

The most common exposure to DPM is breathing air that contains diesel exhaust. The fine and ultra-fine particles are respirable (similar to PM<sub>2.5</sub>), which means that they can avoid many of the human respiratory system defense mechanisms and enter deeply into the lungs. Exposure to DPM comes from both on-road and off-road engine exhaust that is either directly emitted from the engines or lingering in the atmosphere.

Diesel exhaust causes health effects from long-term chronic exposures. The type and severity of health effects depends upon several factors including the amount of chemical exposure and the duration of exposure. Individuals also react differently to different levels of exposure. There is limited information on exposure to only DPM, but there is enough evidence to indicate that inhalation exposure to diesel exhaust causes chronic health effects as well as having cancer-causing potential.

Because it is part of PM<sub>2.5</sub>, DPM also contributes to the same noncancer health effects as PM<sub>2.5</sub> exposure. These effects include premature death, hospitalizations, and emergency department visits for exacerbated chronic heart and lung disease, including asthma, increased respiratory symptoms, and decreased lung function in children. Several studies suggest that exposure to DPM may also facilitate development of new allergies. Those most vulnerable to noncancer health effects are children whose lungs are still developing and the elderly who often have chronic health problems.<sup>30</sup>

### Gasoline Exhaust

Similar to diesel exhaust, gasoline is composed of two phases, gas and particle, and both phases contribute to the health risk. The gas phase is composed of the same TACs, such as acetaldehyde, acrolein, benzene, 1,3-butadiene, formaldehyde, and polycyclic aromatic hydrocarbons. The particle phase is also composed of many different types of particles by size or composition. Fine and ultra-fine diesel particulates are of the greatest health concern and may be composed of elemental carbon with adsorbed compounds such as organic compounds, sulfate, nitrate, metals, and other trace elements. Gasoline exhaust is primarily

<sup>30</sup> California Air Resources Board, *Overview: Diesel Exhaust & Health*, <https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health>. Accessed September 2021.

emitted from light-duty passenger vehicles. The compounds in the gas and particles phases can cause health effects from short- and long-term exposures similar to those described under the TAC and particulate matter discussions above.

### Visibility Reducing Particles

Visibility-reducing particles are any particles in the atmosphere that obstruct the range of visibility by creating haze.<sup>31</sup> These particles vary in shape, size, and chemical composition, and come from a variety of natural and manmade sources including windblown metals, soil, dust, salt, and soot. Other haze-causing particles are formed in the air from gaseous pollutant (e.g., sulfates, nitrates, organic carbon particles) which are the major constituents of fine PM, such as PM<sub>2.5</sub> and PM<sub>10</sub>, and are caused from the combustion of fuel. CARB's standard for visibility reducing particles is not based on health effects, but rather on welfare effects, such as reduced visibility and damage to materials, plants, forests, and ecosystems. The health impacts associated with PM<sub>2.5</sub> and PM<sub>10</sub> are discussed above under Particulate Matter.

## 4.2.3 METHODOLOGY

### 4.2.3.1 Emissions Inventory Modeling

Development of the proposed Project would generate air pollutants from a number of individual sources during both construction and post-construction (operational) use. Intermittent, short-term construction emissions that occur from activities such as demolition, site-grading, concrete construction, and other activities are evaluated. Emissions from operation of the Project, including any reductions in emissions are also evaluated. Regulatory models used to estimate air quality and health impacts include:

- CARB's EMFAC2017<sup>32</sup> emissions inventory model. EMFAC2017 is the latest emission inventory model that calculates emission inventories and emission rates for motor vehicles operating on roads in California. This model reflects CARB's current understanding of how vehicles travel and how much they emit. EMFAC2017 can be used to show how California motor vehicle emissions have changed over time and are projected to change in the future.
- CARB OFFROAD2017 emissions inventory model. OFFROAD<sup>33</sup> is the latest emission inventory model that calculates emission inventories and emission rates for off-road equipment such as loaders, excavators, and off-road haul trucks operating in California. This model reflects CARB's current understanding of how equipment operates and how much they emit. OFFROAD can be used to show

<sup>31</sup> California Air Resources Board, *Visibility Reducing Particles and Health*, <https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health>. Accessed September 2021.

<sup>32</sup> California Air Resources Board, *EMFAC2017 User's Guide*, March 1, 2018, <https://ww3.arb.ca.gov/msei/downloads/emfac2017-volume-i-users-guide.pdf> and <https://www.arb.ca.gov/emfac/2017/>. Accessed September 2021.

<sup>33</sup> California Air Resources Board, *OFFROAD Instructions*, <https://ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/road-documentation/msei-documentation-road>. Accessed September 2021.

how California off-road equipment emissions have changed over time and are projected to change in the future.

- American Meteorological Society/USEPA Regulatory Model (AERMOD). AERMOD (Version 19191) is an atmospheric dispersion model which can simulate point, area, volume, and line emissions sources and has the capability to include simple, intermediate, and complex terrain along with meteorological conditions and multiple receptor locations.<sup>34,35</sup> AERMOD is commonly executed to yield 1-hour maximum and annual average concentrations (in parts per million or ppm and micrograms per cubic meter or  $\mu\text{g}/\text{m}^3$ ) at each receptor. AERMOD is used to estimate air concentrations at nearby receptors resulting from the activities associated with an air emission source (such as construction equipment).
- The California Emissions Estimator Model (CalEEMod),<sup>36</sup> is the CARB-approved computer program model recommended by SCAQMD for use in the quantification of air quality emissions. CalEEMod was developed under the auspices of SCAQMD, with input from other California air districts. CalEEMod utilizes widely accepted models for emissions estimates combined with appropriate data that can be used if site-specific information is not available. For example, CalEEMod incorporates USEPA-developed emission factors; CARB's on-road and off-road equipment emission models, such as EMFAC and OFFROAD; and studies commissioned by other California agencies, such as the California Energy Commission and CalRecycle.

#### 4.2.3.2 Construction

The proposed Project Construction Phasing Narrative provided in **Appendix F.1: Construction Phasing Narrative** was used to estimate construction air quality emissions associated with the proposed Project.

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. Construction emissions can vary substantially from day to day, depending on the intensity and specific type of construction activity. The maximum daily regional emissions are predicted values for the worst-case day and do not represent the emissions that would actually occur during every day of construction. The maximum daily emissions of pollutants were compared to the respective SCAQMD thresholds.

<sup>34</sup> United States Environmental Protection Agency Preferred/Recommended Models, *AERMOD Modeling System*, <https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models#aermod>. Accessed September 2021.

<sup>35</sup> Title 40 CFR Part 51, *Revision to the Guideline on Air Quality Models: Adoption of a Preferred General Purpose (Flat and Complex Terrain) Dispersion Model and Other Revisions*; Final Rule, [http://www.epa.gov/ttn/scram/guidance/guide/appw\\_05.pdf](http://www.epa.gov/ttn/scram/guidance/guide/appw_05.pdf). Accessed September 2021.

<sup>36</sup> CalEEMod, <http://www.caleemod.com/>. Accessed September 2021.

### Construction Schedule

The construction phasing as described below represents a conservative set of assumptions for analysis of the maximum potential impacts from construction of the proposed Project. It is likely that these construction phases will overlap to provide the most efficient construction schedule and be refined as design and implementation of the Project progresses once a contractor is selected for the delivery of the proposed Project. Prior to construction of the proposed Project, reconstruction of the existing Vons store proposed to be demolished to allow construction of the MSF is proposed on the corner of Manchester Boulevard and Hillcrest Boulevard.

- **Phase 1** would include demolition of buildings and site improvements on properties acquired for construction of the project, the beginning of construction of the maintenance and storage facility (MSF), trenching and installation of primary power duct bank, and preparatory work on east side of Prairie Avenue to allow for the roadway shift. Additional work in the area will occur in Phase 4 for the installation of drilled shafts and columns along Prairie Avenue for the guideway. The properties where existing buildings and site improvements will be demolished include at the existing retail commercial center at Market Street and Regent Street, the commercial buildings located at 500 Manchester Boulevard, the commercial building at 150 S. Market Street on the northeast corner of Manchester and Market Street, the retail commercial center at northwest corner of Prairie Avenue and Hardy Street, the commercial building at 401 S. Prairie Avenue, the commercial building at 945 S. Prairie Avenue, and the commercial building at 1003 S. Prairie Avenue. After demolition, the remaining asphalt flatwork areas at the commercial plaza at Market Street and Regent Street, and the commercial building at 150 S. Market Street, and the retail commercial center at northwest corner of Prairie Avenue and Hardy Street will provide suitable 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 1 construction would start in January 2024.
- **Phase 2** would include activities to enable the construction sequence of the guideway along Prairie Avenue from Hardy Street to Manchester Avenue, and work at the MSF site. Phase 2 construction would occur in 2024 through 2025.
- **Phase 3** would include foundation work for the Automated Transit System (ATS) guideway, foundation work for the Market Street/Florence Avenue Station, and construction for the support structure of the MSF building. Phase 3 work will include utility relocation (if necessary), foundations, cast-in-place (CIP) columns, and setting of prefabricated buildings at the two (Power Distribution System Substations [PDS]) substations. Phase 3 construction would occur in 2024 through 2025.
- **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 will include utility relocation (if necessary), foundations, CIP columns, guideway column caps, and installation of equipment at the PDS substations. Phase 4 construction would occur in 2025 through 2026.

#### 4.2 Air Quality

- **Phase 5** construction would include aerial work for the ATS guideway along Prairie Avenue from Hardy Street to Manchester Avenue and Manchester Avenue from Prairie Avenue to Market Street, guideway girder along Market Street, and MSF building interior construction. Phase 5 activities will include guideway girders, guideway straddle caps, and installation of equipment at the PDS substations. Phase 5 construction would occur in 2025 through 2026.
- **Phase 6** 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, completion of Prairie Avenue/Manchester Boulevard Station, completion of Prairie Avenue/Hardy Street Station, and completion of the MSF building, and the elevated passenger walkway to the Los Angeles County Metropolitan Transportation Authority (Metro) K Line Downtown Inglewood Station. Phase 6 construction would occur in 2025 through 2026.
- **Phase 7** would include final site work and completion of the stations. Phase 7 would occur in 2026.
- **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. Phase 8 construction would occur in 2025 through 2027, with the primary construction activities occurring in 2026 and some installation of equipment starting towards the end of Phase 3 construction when sufficient aerial structure is available for the installation of the equipment.

Construction activity would occur 24 hours a day, seven days a week with activities occurring over a 16-hour/day schedule with two shifts, either a morning shift from approximately 7:00 AM to 3:00 PM and an evening shift from approximately 3:00 PM to 11:00 PM, or a morning shift from approximately 7:00 AM to 3:00 PM and a night shift from approximately 11:00 PM to 7:00 AM. The night shift would be used for material deliveries, export of soil and debris and other light construction activities. Certain heavy construction activities that necessitate temporary road closures could occur at night-time to minimize traffic impacts.

Combinations of these shifts would be referred to “Morning/Evening” or “Morning/Night.” Other minimal construction work could occur during other hours at a reduced intensity. The analysis of pollutant concentrations and Health Risk Assessment (HRA) results are presented for both the Morning/Evening and Morning/Night construction scenarios.

#### **Air Emission Calculation Methodology**

Air emission sources include combustion exhaust from on-road vehicles such as construction worker vehicles, pickup/delivery trucks, and haul trucks, as well as off-road construction equipment such as backhoes, loaders, and graders. Fugitive dust emissions from vehicles from handling of soils and entrainment of dust in vehicle tires are also sources of PM<sub>10</sub> and PM<sub>2.5</sub>.

#### 4.2 Air Quality

#### **On-Road Vehicles**

Vehicular on-road emissions were computed using the CARB’s emission factor model, EMFAC2017.<sup>37</sup> Construction worker trips were modeled using the light-duty auto/truck classification. Construction worker trips are a composite of gasoline and diesel vehicles. Foreman trucks used on-site were modeled as gasoline and diesel light heavy-duty trucks. Haul trucks were modeled using the diesel combination long-haul truck classification, which is a heavy-duty truck emission factor for public vehicles. Construction worker commutes were assumed to be 12 miles per one-way trip per day. Distance traveled is conservatively assumed to be 20 miles per one-way trip per day for delivery trucks and concrete trucks.<sup>38</sup> Distance traveled is assumed to be 29 miles per one-way trip per day for asphalt removal trucks, asphalt pavement trucks, and soil spoils dump trucks.<sup>39</sup>

The total annual truck trips within each phase were assumed to be evenly distributed on any given day. The usage factor<sup>40</sup> for haul trucks is approximately 25 percent. Paved road dust, brake wear, and tire wear particulate emissions were also accounted for and included in the analysis using EMFAC2017 emission factors and methodologies. For haul trucks, exhaust particulate emissions are approximately 14 percent of the total particulate emissions.

Criteria pollutant emissions associated with on-road vehicles were calculated for each construction year (2024 to 2027) by combining the activity information with emissions factors, in grams per mile, derived using the EMFAC2017 emissions model. The EMFAC2017 emissions factors are summarized in **Appendix G.1: Air Quality and Human Health Risk Assessment** for employee vehicles, pickup trucks, delivery trucks, and haul trucks for construction years 2024 through 2027.

#### **Off-Road Equipment**

Construction of the proposed Project would require the use of heavy-duty equipment, such as excavators, loaders, forklifts, backhoes, cranes, and off-road haul trucks.

Emissions from construction activities were estimated based on the projected construction activity schedule, the number of vehicles/pieces of equipment, the types of equipment/type of fuel used, vehicle/equipment utilization rates, equipment horsepower, and the construction year. This data was based on the Inglewood Transit Connector Project: Baseline Construction Phasing Narrative by Gannett Fleming (dated October 4, 2021).

<sup>37</sup> California Emissions Estimator Model (CalEEMod), Version 2016.3.2

<sup>38</sup> The maximum distance from four supporting facilities to the proposed Project is 20 miles: CalPortland, Catalina Pacifica Concrete, Cemex-Inglewood, and Robertson’s Read Mix.

<sup>39</sup> The distance to Whittier Landfill from the proposed Project is 29 miles.

<sup>40</sup> Activity level (or usage factor) are defined as the percent of operation for a piece of equipment over a given time.

Emissions from construction activities were also estimated based on load factor (throttle setting)<sup>41</sup> and usage factor.<sup>42</sup>

For the daily emission estimates and short-term ambient concentration analysis (1-hour to 24-hour averaging periods), a usage factor of 100 percent was applied (i.e., full-time operation) to produce a conservative analysis. For the long-term ambient concentration analyses and the health risk assessment, the usage factor of less than 100 percent was applied by equipment type, as not all of the equipment can be used every hour of the day and every day of the year due to safety issues and manpower constraints.

This information was applied to criteria pollutant emissions factors, in grams per horsepower-hour, primarily derived using the OFFROAD emissions model. Off-road construction equipment emissions were computed, and the emissions factors used in this assessment are summarized, by equipment type within **Appendix G.1** for 2024 through 2027, respectively.

#### 4.2.3.3 Operation

Analysis of the proposed Project's operational emissions considers three types of sources: 1) area; 2) energy; and 3) mobile. A description of the proposed Project's various operational components is detailed in **Section 3.0: Project Description, 3.5: Project Characteristics**.

#### Area

Operation of the proposed Project would generate criteria air pollutant emissions from area sources such as operation of landscaping equipment and use of consumer products, including solvents used in nonindustrial applications which emit VOCs during their product use, such as cleaning supplies. The operational area emissions from the proposed Project were estimated using the CalEEMod<sup>43</sup> software. Area source emissions are based on architectural coatings, landscaping equipment, and consumer product usage rates provided in CalEEMod.

#### Natural Gas

Operation of the proposed Project would generate criteria air pollutant emissions from natural gas combustion. Energy source emissions are generated as a result of activities in buildings which utilize natural gas utility infrastructure. The operational energy emissions from the proposed Project were estimated using the CalEEMod<sup>44</sup> software. Energy source emissions were based on natural gas (building

41 Load factor (or throttle setting) are the engine performance demands, as a percent of maximum power; based on values within OFFROAD and typically ranging from 30 to 80 percent depending on equipment type.

42 Activity level (or usage factor) are defined as the percent of operation for a piece of equipment over a given time.

43 CalEEMod, <http://www.caleemod.com/>. Accessed September 2021.

44 CalEEMod, <http://www.caleemod.com/>. Accessed September 2021.

heating and water heaters) usage rates provided in CalEEMod. Natural gas usage factors in CalEEMod were based on the California Energy Commission California Commercial End Use Survey<sup>45</sup> (CEUS) data set, which provides energy demand by building type and climate zone. Default parameters were used when project-specific data was not available.

#### Mobile

Operation of the proposed Project would generate criteria air pollutant emissions from mobile sources from Project-generated vehicle trips traveling to and from the MSF and associated facilities, including the parking lots at the Market Street/Florence Avenue Station, at 150 S. Market Street, and at the MSF Facility site. Mobile emissions were calculated based on the data provided in the proposed Project's Transportation Study (see **Appendix O: Transportation Assessment Study**) which is further discussed in **Section 4.12: Transportation**. Under the Transportation Study, vehicle miles traveled (VMT) is the primary performance metric used to identify impacts. VMT associated with trips to and from all areas within the City were included in the Transportation Study and were utilized to calculate operational air quality emissions from mobile sources. Emissions from motor vehicles are dependent on vehicle type. Thus, the emissions were calculated using a representative motor vehicle fleet mix for the proposed Project and EMFAC2017 default fuel type.

The Adjusted Baseline Environmental Setting is described in **Section 4.0: Environmental Analysis**. Project operations are expected to commence in 2027. Regulatory models used to estimate air quality from proposed Project operations include the CARB EMFAC2017<sup>46</sup> emissions inventory model. Consistent with the Transportation Study, six operational scenarios were analyzed to evaluate the proposed Project's indirect operational emissions, as follows:

1. Adjusted Baseline,
2. Adjusted Baseline with the proposed Project,
3. Year 2027 with Event Weekday without the proposed Project,
4. Year 2027 with Event Weekday with the proposed Project,
5. Year 2045 with Event Weekday without the proposed Project, and
6. Year 2045 with Event Weekday with the proposed Project.

45 California Energy Commission, *California Commercial End Use Survey*, <https://www.energy.ca.gov/data-reports/surveys/california-commercial-end-use-survey#:~:text=The%20California%20Commercial%20End%2DUse,Commission%27s%20commercial%20sector%20forecast%20model>. Accessed September 2021.

46 California Air Resources Board, *EMFAC2017 User's Guide*, March 1, 2018, <https://www.arb.ca.gov/msei/downloads/emfac2017-volume-i-users-guide.pdf>. Accessed September 2021.

#### 4.2 Air Quality

Details of each of the above scenarios are provided in **Section 4.12** and in **Appendix O**.

The proposed Project would also produce criteria air pollutant emissions from on-site diesel-fueled emergency generators and delivery trucks. Daily maximum criteria air pollutant emissions were compared with SCAQMD thresholds for operation to determine the operational impacts of the proposed Project. Regional operational air quality impacts were assessed based on the incremental increase/decrease in emissions compared to the Adjusted Baseline. Air pollutant emissions from the existing uses to be demolished were removed from the estimated emissions for the proposed Project's operational emissions.

#### **Backup Generators**

To assure the ability to allow ATS trains to reach the nearest stations to offload riders in the event of loss of electrical supply, each PDS substation will be equipped with backup power generators. The proposed Project would include up to two stationary standby generators, one at each of the two PDS substations, with an estimated total capacity rated at approximately 4,000 kilowatts (kW) to provide emergency power primarily for ATS train operation, lighting, and other emergency systems. Emergency generator emissions were calculated based on compliance with applicable federal emissions standards and compliance with SCAQMD Rule 1470<sup>47</sup> (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines) mandated emission limits and operating hour constraints. This analysis also assumed that the standby generators would operate up to two hours per day and a total of 50 hours per year for testing and maintenance (per SCAQMD Rule 1470 limit). SCAQMD requires that all internal combustion engines (ICE) greater than 50 brake horsepower (bhp) and gas turbines greater than 2,975,000 Btu per hour obtain a permit to construct prior to installation of the engines at a site.

A standby ICEs greater than 50 bhp or turbine for nonutility power generation that does not operate more than 200 hours a year and is only operated in the event of an emergency power failure or for routine testing and maintenance is considered an emergency backup generator for power generation. The SCAQMD allows for the use of backup generators thru specific permits prior to installation.<sup>48</sup>

The proposed Project would implement the following operational equipment requirements and operation protocols for operating backup generators. These would include the following:

47 SCAQMD, *Rule 1470 - Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines*.

48 SCAQMD, *Permits, Emergency Generators*. <http://www.aqmd.gov/home/permits/emergency-generators>. Accessed September 2021.

#### 4.2 Air Quality

- All backup generators would be selected from the SCAQMD certified generators list and meet applicable federal standards for diesel emissions. For after-treatment of engine exhaust air, a diesel particulate filter would be provided to meet the emission level requirements of SCAQMD;
- The proposed Project would have two standby generators, each could operate up to two hours per day and a total of 50 hours per year for testing and maintenance (per SCAQMD Rule 1470 limit) to ensure reliability in the case of a power outage; and
- The proposed Project would conduct maintenance and/or testing on the two standby generators on separate days.

As such, each standby generator would operate for 2 hours per day during 24 days per year (twice a month) for a total of not more than 50 hours per year. Each standby generator would be tested during different days; if needed for emergency operation, both generators would operate up to 2 hours each and could occur simultaneously.

#### **4.2.3.4 Health Risk Assessment**

A health risk assessment (HRA) estimates the health impacts to be expected from a project's TAC emissions. The greatest potential for TAC emissions during Project construction would be related to diesel particulate matter emissions associated with heavy-duty equipment. Although construction would be temporary, construction health impacts associated with TACs were addressed quantitatively in an HRA. Potential impacts to human health associated with TAC emissions may include increased cancer risks and increased chronic (long-term) and acute (short-term) non-cancer health hazards from inhalation of TACs. An HRA also assesses cancer burden which is the estimated increase in the occurrence of cancer cases in a population as a result of exposure to TAC emissions. The proposed Project's HRA was conducted following the methodologies in OEHHA's Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments<sup>49</sup> and SCAQMD's Risk Assessment Procedures for Rule 1401, 1401.1 and 212.<sup>50</sup> In accordance with SCAQMD guidance, modeled receptors for the HRA were placed at locations in which people are typically located for a period of time. The receptors for the HRA within one quarter of a mile of the proposed Project are as follows:

- Single and multifamily residences along the proposed Project length.
- Off-site workers within industrial and commercial areas surrounding the proposed Project area.
- Recreational facilities such as Queen Park.
- Medical facilities such as Hillcrest Medical Center and Centinela Hospital Medical Center.

49 Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, February 2015, [http://oehha.ca.gov/air/hot\\_spots/hotspots2015.html](http://oehha.ca.gov/air/hot_spots/hotspots2015.html). Accessed September 2021.

50 *South Coast Air Quality Management District, Risk Assessment Procedures for Rule 1401, 1401.1 and 212*, September 1, 2017, <http://www.aqmd.gov/docs/default-source/permitting/rule-1401-risk-assessment/riskassessproc-v8-1.pdf?sfvrsn=12>. Accessed September 2021.

- Educational facilities such as Inglewood High School, Inglewood Junior Academy, George W Crozier Middle School, and Kelso Elementary School.
- Off-site daycare/childcare such as South Bay Child Development Center, Tender Care Child Development Center, A Bright Beginning Child Development Center, and Debbie's Child Development Center.

Sensitive receptors located within a quarter-mile of the proposed Project are shown in **Figure 4.0-3a-c: Map of Sensitive Receptors**. All receptors were set so that only ground-level concentrations were analyzed as that is where the sensitive receptors are located.

OEHHA's Guidance Manual<sup>51</sup> ensures that the greater sensitivity of children to cancer and other health risks is reflected in an HRA. For example, OEHHA recommends that risks be analyzed separately for multiple age groups, focusing especially on young children and teenagers, rather than the past practice of analyzing risks to the general population, without distinction by age. OEHHA also recommends that statistical "age sensitivity factors" be incorporated into an HRA, and that children's relatively high breathing rates be accounted for. On the other hand, the Guidance Manual revisions also include some changes that would reduce calculated health risks. For example, under the former guidance, OEHHA recommended that residential cancer risks be assessed by assuming 70 years of exposure at a residential receptor; under the Guidance Manual, this assumption is lessened to 30 years.

Terrain elevations for emission source locations were based on AERMAP (Version 11103). Hourly meteorological data from Los Angeles International Airport, located approximately four miles to the west-southwest of the proposed Project was used in the dispersion modeling analysis and HRA. Once the dispersion modeling estimated TAC concentrations at the receptors, the risk assessment applied established cancer risk estimates and acceptable reference concentrations for noncancer health effects to determine carcinogenic and non-carcinogenic human health impacts, respectively.

**Appendix G.1** provides additional methodologies and assumptions used within the HRA.

51 Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, February 2015, [http://oehha.ca.gov/air/hot\\_spots/hotspots2015.html](http://oehha.ca.gov/air/hot_spots/hotspots2015.html). Accessed September 2021.

## 4.2.4 REGULATORY FRAMEWORK

### 4.2.4.1 Federal Regulations

#### *Clean Air Act*

The USEPA is responsible for the implementation of portions of the CAA of 1970, which regulates certain stationary and mobile sources of air emissions and other requirements. The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA that are most applicable to the proposed Project include Title I, Nonattainment Provisions, and Title II, Mobile Source Provisions.

Charged with handling global, international, national, and interstate air pollution issues and policies, the USEPA sets national vehicle and stationary source emission standards, oversees the approval of all State Implementation Plans,<sup>52</sup> provides research and guidance for air pollution programs, and sets national AAQS (NAAQS).<sup>53</sup> NAAQS for the six common air pollutants (ozone, PM<sub>10</sub> and PM<sub>2.5</sub>, NO<sub>2</sub>, CO, Pb, and SO<sub>2</sub>) are identified in the CAA.

The NAAQS were amended in July 1997 to include an 8-hour standard for O<sub>3</sub> and to adopt a NAAQS for PM<sub>2.5</sub>. The NAAQS were amended in September 2006 to include an established methodology for calculating PM<sub>2.5</sub> and to revoke the annual PM<sub>10</sub> threshold. More stringent area requirements now apply including implementation of Best Available Control Measures/Best Available Control Technology (BACM/BACT), a lower major source threshold (from 100 tons per year to 70 tons per year), and an update to the reasonable further progress (RFP) analysis.<sup>54</sup> Title I (Nonattainment Provisions)<sup>55</sup> requirements are implemented for the purpose of attaining NAAQS for the following criteria air pollutants: O<sub>3</sub>; NO<sub>2</sub>; CO; SO<sub>2</sub>; PM<sub>10</sub>; and lead. **Table 4.2-1: Federal and State Ambient Air Standards** shows the NAAQS currently in effect for each criteria air pollutant.

52 A State Implementation Plan is a document prepared by each state describing existing air quality conditions and measures that will be followed to attain and maintain National Ambient Air Quality Standards (NAAQS).

53 The NAAQS were established to protect public health, including that of sensitive individuals; for this reason, the standards continue to change as more medical research becomes available regarding the health effects of the criteria pollutants. The primary NAAQS defines the air quality considered necessary, with an adequate margin of safety, to protect the public health.

54 SCAQMD, "Final 2016 Air Quality Management Plan" (2017), <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>. Accessed September 2021.

55 USEPA, *Clean Air Act Title I - Air Pollution Prevention and Control, Parts A through D*. [https://19january2017snapshot.epa.gov/clean-air-act-overview/clean-air-act-title-i-air-pollution-prevention-and-control-parts-through-d\\_.html](https://19january2017snapshot.epa.gov/clean-air-act-overview/clean-air-act-title-i-air-pollution-prevention-and-control-parts-through-d_.html). Accessed September 2021.

Table 4.2-1  
Federal and State Ambient Air Standards

Pollutant	Average Time	California Standards <sup>a</sup>		National Standards <sup>b</sup>		
		Concentration <sup>c</sup>	Method <sup>d</sup>	Primary <sup>e,g</sup>	Secondary <sup>e,f</sup>	Method <sup>h</sup>
O <sub>3</sub> <sup>h</sup>	1 hour	0.09 ppm (180 µg/m <sup>3</sup> )	Ultraviolet Photometry	-	Same as Primary Standard	Ultraviolet Photometry
	8 hour	0.170 ppm (137 µg/m <sup>3</sup> )		0.070 ppm (137 µg/m <sup>3</sup> )		
	1 hour (98 <sup>th</sup> Percentile) <sup>i</sup>	0.18 ppm (339 µg/m <sup>3</sup> )		100 ppb (188 µg/m <sup>3</sup> )	None	
NO <sub>2</sub> <sup>j</sup>	Annual Arithmetic Mean	0.030 ppm (57 µg/m <sup>3</sup> )	Gas Phase Chemiluminescence	53 ppb (100 µg/m <sup>3</sup> )	Same as Primary Standard	Gas Phase Chemiluminescence
	1 hour	20 ppm (23 mg/m <sup>3</sup> )		35 ppb (40 mg/m <sup>3</sup> )	None	
CO	8 hour	9.0 ppm (10mg/m <sup>3</sup> )	Non-Dispersive Infrared Photometry (NDIR)	-	None	Non-Dispersive Infrared Photometry (NDIR)
	1 hour	6 ppm (7 mg/m <sup>3</sup> )		75 ppb (196 µg/m <sup>3</sup> )	-	
SO <sub>2</sub> <sup>j</sup>	3 hour	-	Ultraviolet Fluorescence	-	5 ppm (1300 µg/m <sup>3</sup> )	Ultraviolet Fluorescence; Spectrophotometry (Parosoline Method)
	24 hour	0.04 ppm (105 µg/m <sup>3</sup> )		0.14 ppm (for certain areas) <sup>j</sup>	-	
	Annual Arithmetic Mean	-		0.030 ppm (for certain areas) <sup>j</sup>	-	
PM <sub>10</sub> <sup>k</sup>	24 Hour	50 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	150 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m <sup>3</sup>		-	Same as Primary Standard	
PM <sub>2.5</sub> <sup>k</sup>	24 Hour	No Separate State Standard	Gravimetric or Beta Attenuation	Gravimetric or Beta Attenuation	Same as Primary Standard	High Volume Sampler and Atomic Absorption
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>		Gravimetric or Beta Attenuation	12.0 µg/m <sup>3</sup> k	
	30 Day Average	1.5 µg/m <sup>3</sup>		-	15 µg/m <sup>3</sup>	
Lead <sup>lm</sup>	Calendar Quarter	-	Atomic Absorption	1.5 µg/m <sup>3</sup> (for certain areas) <sup>m</sup>	Same as Primary Standard	High Volume Sampler and Atomic Absorption
	Rolling 3-Month Average	-		0.15 µg/m <sup>3</sup>	Same as Primary Standard	

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Pollutant	Average Time	California Standards <sup>a</sup>		National Standards <sup>b</sup>		
		Concentration <sup>c</sup>	Method <sup>d</sup>	Primary <sup>e,g</sup>	Secondary <sup>e,f</sup>	Method <sup>h</sup>
Visibility Reducing Particles <sup>o</sup>	8 Hour	Extinction coefficient of 0.23 per kilometer 10 miles or more (0.07 – 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70%. Method: Beta Attenuation and Transmittance through Filter Tape.	Ion Chromatography	-	-	No Federal Standards
	24 Hour	25 µg/m <sup>3</sup>		-	-	
Hydrogen Sulfide	1 Hour	0.03 ppb (42 µg/m <sup>3</sup> )	Ultraviolet Fluorescence	-	-	No Federal Standards
	24 hour	0.01 ppb (26 µg/m <sup>3</sup> )		-	-	

Notes:

- a California standards for ozone, carbon monoxide (except 8-hour, Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM<sub>10</sub>, PM<sub>2.5</sub>, and visibility reducing particles), are values that are not to be exceeded. All others are not to be exceeded. CAAQS are listed in the table of Standards in section 70200 of Title 17 of the California Code of Regulations.
- b National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM<sub>10</sub>, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 micrograms per cubic meter (µg/m<sup>3</sup>) is equal to or less than one. For PM<sub>2.5</sub>, the 24-hour standard is attained when 96 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.
- c Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 millibars per mole of air. Air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- d Any equivalent procedure which can be shown to the satisfaction of the CARB to give equivalent results at or near the level of the air quality standard may be used.
- e National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- f National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- g Reference method as described by the USEPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the USEPA.
- h On October 1, 2015, the national 8-hour ozone, primary and secondary standards were lowered from 0.075 to 0.070 ppm.
- i To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb.
- j On June 2, 2010, a new 1-hour SO<sub>2</sub> standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO<sub>2</sub> national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.
- k On December 14, 2012, the national annual PM<sub>2.5</sub> primary standard was lowered from 15 µg/m<sup>3</sup> to 12.0 µg/m<sup>3</sup>.
- l CARB has identified lead and vinyl chloride as "toxic air contaminants" with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
- m The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 µg/m<sup>3</sup> as a quarterly average) remains in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2010 standard are approved.
- n In 1989, CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the Statewide and Lake Tahoe Air Basin standards, respectively.

Source: CARB, Ambient Air Quality Standards, <https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards>. Accessed September 2021.

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#### 4.2.4.2 State Regulations

##### **California Clean Air Act**

The California CAA,<sup>56</sup> signed into law in 1988, requires all areas of the State to achieve and maintain the CAAQS by the earliest practicable date.<sup>57</sup> CARB, a part of the California EPA (CalEPA), is responsible for the coordination and administration of both State and federal air pollution control programs within California. In this capacity, CARB conducts research, sets State ambient air quality standards, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products, and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions and the CAAQS currently in effect for each of the criteria pollutants, as well as for other pollutants recognized by the State. The CAAQS are more stringent than the NAAQS.

##### **Air Quality and Land Use Handbook**

CARB published the *Air Quality and Land Use Handbook*<sup>58</sup> on April 28, 2005, to serve as a general guide for considering health effects associated with siting sensitive receptors proximate to sources of TAC emissions. The recommendations provided therein are voluntary and do not constitute a requirement or mandate for either land use agencies or local air districts. The goal of the guidance document is to protect sensitive receptors, such as children, the elderly, acutely ill, and chronically ill persons, from exposure to TAC emissions.

Some examples of CARB's siting recommendations include the following: (1) avoid siting sensitive receptors within 500 feet of a freeway, urban road with 100,000 vehicles per day, or rural road with 50,000 vehicles per day; (2) avoid siting sensitive receptors within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 50 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week); and (3) avoid siting sensitive receptors within 300 feet of any dry cleaning operation using perchloroethylene and within 500 feet of operations with two or more machines.

##### **California Air Resources Board (CARB)**

Mobile sources are a significant contributor to the air pollution in California. CARB has established exhaust emission standards for automobiles, which are more stringent than the federal emissions standards.

<sup>56</sup> California Air Resources Board (CARB), California Clean Air Act (1988), [https://arb.ca.gov/bluebook/bb05/HEA\[14\]16/HEA\\_\[14\]\\_16.htm](https://arb.ca.gov/bluebook/bb05/HEA[14]16/HEA_[14]_16.htm). Accessed September 2021.  
<sup>57</sup> CARB, "CAAQS" (August 10, 2017), <https://www.arb.ca.gov/research/aaqs/caaqs/caaqs.htm>. Accessed September 2021.  
<sup>58</sup> CARB, *Air Quality and Land Use Handbook: A Community Health Perspective* (April 2005), <https://www.arb.ca.gov/ch/handbook.pdf>. Accessed September 2021.

Through its Mobile Sources Program, CARB has developed programs and policies to reduce emissions from on-road heavy-duty diesel vehicles. Specifically, the On-Road Heavy-Duty Diesel Vehicle Regulation requires diesel trucks and buses that operate in the State to be upgraded to reduce emissions. By January 1, 2023, nearly all vehicles must have engines certified to 2010 model year engines or equivalent. The Innovative Clean Transit Program (ICT) sets emissions reduction standards for new public transit vehicles and requires major transit agencies to only purchase zero emission (ZE) buses after 2029. The Solid Waste Collection Vehicle Regulation requires solid waste collection vehicles and heavy diesel-fueled on-road single engine cranes to be upgraded. The Rule for On-Road Heavy-Duty Diesel-Fueled Public and Utility Fleets requires fleets to install emission control devices on vehicles or purchase vehicles that run on alternative fuels or use advanced technologies to achieve emissions requirements by specified implementation dates. CARB also establish an In-Use Off-Road Diesel-Fueled Fleets Regulation to impose limits on idling and require fleets to retrofit or replace older engines. Stationary sources can be divided into two major subcategories: point and area sources. Point sources are permitted facilities with one or more emission sources at an identified location (e.g., power plants, refineries). These facilities generally have annual emissions of 4 tons or more of either VOC, NOx, SOx, or total Particulate Matter (PM), or annual emissions of over 100 tons of CO. Facilities are required to report their criteria pollutant emissions pursuant to Rule 301 and selected air toxics to the SCAQMD on an annual basis, subject to audit, if any of these thresholds are exceeded.

Area sources consist of many small emission sources (e.g., residential water heaters, architectural coatings, consumer products and permitted sources that are smaller than the above thresholds) which are distributed across the region and are not required to individually report their emissions. There are about 400 area source categories for which emission estimates are jointly developed by CARB and the SCAQMD.

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

The purpose of this regulation is to reduce emissions of diesel particulate matter (PM), NOx and other criteria pollutants from in-use diesel-fueled vehicles.<sup>59</sup> This regulation applies to any person, business, federal government agency, school district or school transportation provider that owns or operates, leases, or rents, affected vehicles that operate in California. Affected vehicles are those that operate on diesel-fuel, dual-fuel, or alternative diesel-fuel that are registered to be driven on public highways, were originally designed to be driven on public highways whether or not they are registered, yard trucks with on-road engines or yard trucks with off-road engines used for agricultural operations, both engines of two-engine

<sup>59</sup> Title 13, California Code of Regulations Division 3: Air Resources Board Chapter 1: Motor Vehicle Pollution Control Devices. § 2025. Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use Heavy-Duty Diesel-Fueled Vehicles. <https://ww3.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf>. Accessed September 2021.

sweepers, school buses, and have a manufacturer's gross vehicle weight rating (GVWR) greater than 14,000 pounds (lbs.).

#### California Air Resources Board Truck and Bus Regulation

In 2008, CARB approved the Truck and Bus Regulation to reduce NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from existing diesel vehicles operating in California. The requirements were amended in December 2010 and apply to nearly all diesel fueled trucks and busses with a gross vehicle weight rating greater than 14,000 pounds. For the largest trucks in the fleet (i.e., those with a gross vehicle weight rating greater than 26,000 pounds), there are two methods to comply with the requirements. The first method is for the fleet owner to retrofit or replace engines, starting with the oldest engine model year, to meet 2010 engine standards, or better. This is phased over eight years, starting in 2015 and would be fully implemented by 2023, meaning that all trucks operating in the State subject to this option would need to meet or exceed the 2010 engine emission standards for NO<sub>x</sub> and PM by 2023. The second option, if chosen, requires fleet owners, starting in 2012, to retrofit a portion of their fleet with diesel particulate filters achieving at least 85 percent removal efficiency, so that by January 1, 2016, their entire fleet is equipped with diesel particulate filters. However, diesel particulate filters do not typically lower NO<sub>x</sub> emissions. Thus, fleet owners choosing the second method must still comply with the 2010 engine emission standards for their trucks and busses by 2020. Beginning January 1, 2020, this requirement will be enforced by the California Department of Motor Vehicles (DMV). Senate Bill 1 (SB1), the Road Repair and Accountability Act of 2017, was signed into law on April 28, 2017. SB1 authorizes the DMV to check that vehicles are compliant with or exempt from CARB's Truck and Bus Regulation. If a vehicle is not compliant with the rule, DMV will no longer register that vehicle starting January 1, 2020.

In addition to limiting exhaust from idling trucks, CARB promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower such as bulldozers, loaders, backhoes, and forklifts, as well as many other self-propelled off-road diesel vehicles. The regulation adopted by CARB on July 26, 2007, aims to reduce emissions by installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation is staggered based on fleet size (which is the total of all off-road horsepower under common ownership or control), with the largest fleets to begin compliance by January 1, 2014. Each fleet must demonstrate compliance through one of two methods. The first option is to calculate and maintain fleet average emissions targets, which encourages the retirement or repowering of older equipment and rewards the introduction of newer cleaner units into the fleet. The second option is to meet the Best Available Control Technology (BACT) requirements by turning over or installing Verified Diesel Emission Control Strategies (e.g., engine retrofits) on a certain percentage of its total fleet horsepower. The

compliance schedule requires that BACT turn overs or retrofits be fully implemented by 2023 in all equipment in large and medium fleets and across 100 percent of small fleets by 2028.

#### CARB Rule 2449, General Requirements for In-Use Off-Road Diesel-Fueled Fleets

Requires off-road diesel vehicles to limit nonessential idling to no more than 5 consecutive minutes.<sup>60</sup>

#### CARB Rule 2480 Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools

CARB Rule 2480 requires school busses, transit busses, and commercial vehicles (gross vehicle weight greater than 10,001 pounds except for pickup trucks and zero emission vehicles) to limit nonessential idling to no more than 5 consecutive minutes when within 100 feet of a school.<sup>61</sup>

#### CARB Rule 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

The Airborne Toxic Control Measure (ATCM) to Limit Diesel-Fueled Commercial Motor Vehicle Idling<sup>62</sup> measure includes regulations that pertain to air quality emissions. Specifically, Section 2485 states that during construction, the idling of all diesel-fueled commercial vehicles weighing more than 10,000 pounds shall be limited to 5 minutes at any location. In addition, Section 93115 in Title 17 of the California Code of Regulations (CCR)<sup>63</sup> states that operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

### California Building Standards Code

#### California Energy Code

California's Energy Efficiency Standards for Residential and Nonresidential Buildings<sup>64</sup> were established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 requires the

60 CARB, General Requirements for In-Use Off-Road Diesel-Fueled Fleets, [https://ww3.arb.ca.gov/regs/t13-regulations/s2449-2449\\_3.pdf](https://ww3.arb.ca.gov/regs/t13-regulations/s2449-2449_3.pdf). Accessed September 2021.

61 CARB, *Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools*, <https://www.arb.ca.gov/regs/t13-regulations/s2480-2485.pdf>. Accessed September 2021.

62 CARB, CARB Rule 2485, [https://www.arb.ca.gov/msprog/truck-idling/13ccr2485\\_09022016.pdf](https://www.arb.ca.gov/msprog/truck-idling/13ccr2485_09022016.pdf). Accessed September 2021.

63 CARB, Final Regulation Order: Amendments to the Airborne Toxic Control Measure For Stationary Compression Ignition Engines (May 19, 2011), Accessed June 2020, <https://ww2.arb.ca.gov/sites/default/files/classic/diesel/documents/finalreg2011.pdf>. Accessed September 2021.

64 California Energy Commission, 2019 Building Energy Efficiency Standards, <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency>. Accessed September 2021.

64 California Energy Commission, 2019 Building Energy Efficiency Standards, <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency>. Accessed September 2021.

design of building shells and components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

The California Energy Commission (CEC) adopted 2019 Title 24 standards, which became effective on January 1, 2020, and are applicable to the proposed Project.<sup>65</sup> The 2019 standards will continue to improve upon prior Title 24 standards for new construction of, and additions and alterations to, residential and nonresidential buildings.<sup>66</sup>

#### California Green Building Code

The California Green Building Standards Code, which is Part 11 of the CCR, is commonly referred to as the CALGreen Code.<sup>67</sup> The most current version of the CALGreen building code went into effect in January 2020. The purpose is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress facilities, and general stability by regulating and controlling the design, construction, quality of materials, outdoor lighting standards, use and occupancy, location, and maintenance of all building and structures within its jurisdiction.

#### 4.2.4.3 Regional Regulations

##### *South Coast Air Quality Management District*

SCAQMD shares responsibility with CARB for ensuring that all State and federal ambient air quality standards are achieved and maintained over an area of approximately 10,743 square miles. This area includes the South Coast Air Basin (Basin) and portions of the Salton Sea and Mojave Desert Air Basins (MDAB), all of Orange County, and the nondesert portions of Los Angeles, Riverside, and San Bernardino counties. It does not include the Antelope Valley or the nondesert portion of western San Bernardino County.

SCAQMD is responsible for controlling emissions primarily from stationary sources. SCAQMD maintains air quality monitoring stations throughout the Basin. SCAQMD, in coordination with the Southern California Association of Governments (SCAG), is also responsible for developing, updating, and implementing the AQMP for the Basin. An AQMP is a plan prepared and implemented by an air pollution district for a county or region designated as nonattainment of the national and/or California ambient air quality standards.

<sup>65</sup> See California Energy Commission, 2019 Building Energy Efficiency Standards for additional information.

<sup>66</sup> See California Energy Commission, 2019 Building Energy Efficiency Standards for additional information.

<sup>67</sup> California Buildings Standards Commission, California Green Building Standards Code (Cal. Code Regs., Title 24, Part 11), <http://www.bsc.ca.gov/Home/CALGreen.aspx>. Accessed September 2021.

#### South Coast Air Quality Management District Air Quality Management Plan (AQMP)

The proposed Project lies within the jurisdiction of the SCAQMD, and compliance with SCAQMD rules and guidelines is required. SCAQMD is responsible for controlling emissions primarily from stationary sources.

The SCAQMD approved a Final 2016 AQMP on March 3, 2017.<sup>68</sup> The 2016 AQMP includes transportation control measures developed by SCAG from the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), as well as the integrated strategies and measures needed to meet the NAAQS. The 2016 AQMP demonstrates attainment of the 1-hour and 8-hour ozone NAAQS as well as the latest 24-hour and annual PM<sub>2.5</sub> standards.

Under the Federal CAA, SCAQMD has adopted federal attainment plans for O<sub>3</sub> and PM<sub>10</sub>. The SCAQMD reviews projects to ensure that they would not (1) cause or contribute to any new violation of any air quality standard; (2) increase the frequency or severity of any existing violation of any air quality standard; or (3) delay the timely attainment of any air quality standard or any required interim emission reductions or other milestones of any federal attainment plan.

The SCAQMD is responsible for limiting the number of emissions that can be generated throughout the Basin by various stationary, area, and mobile sources. Specific rules and regulations have been adopted by the SCAQMD Governing Board. These rules and regulations limit the emissions that can be generated by various uses or activities and identify specific pollution reduction measures, which must be implemented in association with various uses and activities. These rules not only regulate the emissions of the federal and State criteria pollutants, but also toxic air contaminants and acutely hazardous materials. The rules are also subject to ongoing refinement by SCAQMD.

#### South Coast Air Quality Management District Rules and Regulations

Among the SCAQMD rules applicable to the proposed Project are Rule 403 (Fugitive Dust), and Rule 1113 (Architectural Coatings). Rule 403 requires the use of stringent best available control measures to minimize PM<sub>10</sub> emissions during grading and construction activities. Rule 1113 will require reductions in the VOC content of coatings, with a substantial reduction in the VOC content limit for flat coatings to 50 grams per liter (g/L) in July 2008.<sup>69</sup> Additional details regarding these rules and other potentially applicable rules are presented as follows.

<sup>68</sup> SCAQMD, *Final 2016 Air Quality Management Plan* (2016), <https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>. Accessed September 2021.

<sup>69</sup> SCAQMD, Rule 1113 Architectural Coating (amended September 6, 2013), <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-1113.pdf>. Accessed September 2021.

**Rule 201 Permit to Construct**

Rule 201 requires a permit for installation of any equipment which releases air pollutants.<sup>70</sup>

**Rule 401–Visible Emissions**

This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view.<sup>71</sup>

**Rule 402 Nuisance Odors**

Rule 402 prohibits the discharge of odors that cause injury, detriment, nuisance, or annoyance to a considerable number of people.<sup>72</sup>

**Rule 403 Fugitive Dust**

Rule 403<sup>73</sup> requires fugitive dust sources to implement Best Available Control Measures for all sources and prohibits all forms of visible particulate matter from crossing any property line. This may include application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour (mph), sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites. SCAQMD Rule 403 is intended to reduce PM<sub>10</sub> emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust (see also Rule 1186).

**Rule 1113 Architectural Coatings**

Rule 1113<sup>74</sup> requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

70 SCAQMD, "Rule 201: Permit to Construct" (amended December 3, 2004), <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>. Accessed September 2021.

71 SCAQMD, "Rule 401: Visible Emissions", <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book>. Accessed September 2021.

72 SCAQMD, "Rule 402: Nuisance", <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>. Accessed September 2021.

73 SCAQMD, "Rule 403: Fugitive Dust", <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>. Accessed September 2021.

74 SCAQMD, "Rule 1113: Architectural Coatings", <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-1113.pdf>. Accessed September 2021.

**Rule 1146.2 Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters**

Rule 1146.2<sup>75</sup> requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing units to reduce NOx emissions from natural gas-fired water heaters, boilers, and process heaters as defined in this rule.

**Rule 1186, PM<sub>10</sub> Emissions from Paved and Unpaved Roads, and Livestock Operations**

Rule 1186 requires control measures to reduce fugitive dust from paved and unpaved roads in addition to livestock operations.<sup>76</sup>

**Regulation XIII – New Source Review (NSR)**

The South Coast Air Quality Management District (South Coast AQMD) adopted its New Source Review (NSR) program in October 1976.<sup>77</sup> The current NSR regulation is codified by South Coast AQMD Regulation XIII–New Source Review.

NSR is a preconstruction review required under both federal and State statutes for new and modified sources located in areas that do not meet the Clean Air Act standards for healthy air (nonattainment areas). NSR applies to both individual permits and entire facilities. Any permit that has a net increase in emissions is required to apply BACT (equivalent to federal Lowest Achievable Emission Rate). Facilities with a net increase in emissions are required to offset the emission increase by use of Emission Reduction Credits (ERCs). The regulation provides for the application, eligibility, registration, use and transfer of ERCs. For low emitting facilities, the South Coast AQMD maintains an internal bank that can be used to provide the required offsets. In addition, certain facilities are subject to provisions that require public notice and modeling analysis to determine the downwind impact prior to permit issuance.

**Regulation XIV – Toxics and Other Noncriteria Air Pollutants**

Regulation XIV<sup>78</sup> sets requirements for new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants or other noncriteria air pollutants. The following is a list of rules which may apply to the proposed Project:

75 SCAQMD, "Rule 1146.2: Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters," <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-1146.2.pdf>. Accessed September 2021.

76 SCAQMD, "Rule 1186: PM10 Emissions From Paved and Unpaved Roads, and Livestock Operations" (amended July 11, 2008), <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1186.pdf>. Accessed September 2021.

77 SCAQMD, Regulation XIII – New Source Review. October 2016. <http://www.aqmd.gov/home/permits/new-source-review>. Accessed September 2021.

78 SCAQMD, Regulation XIV – Toxics and Other Noncompliance Air Pollution. <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiv>. Accessed September 2021.

**Rule 1401 – New Source Review of Toxic Air Contaminants**

This rule regulates new or modified facilities to limit cancer and noncancer health risks from facilities located within SCAQMD jurisdiction.

**Rule 1402 – Control of Toxic Air Contaminants from Existing Sources**

This rule regulates facilities that are already operating in order to limit cancer and noncancer health risks. Rule 1402 incorporates the requirements and methodology of the AB 2588 Air Toxics "Hot Spots" program.

**Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities**

This rule requires owners and operators of any demolition or renovation activity and the associated disturbance of asbestos-containing materials, any asbestos storage facility, or any active waste disposal site to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (see **Section 4.8: Hazards and Hazardous Materials**).

**Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines**

SCAQMD Rule 1470<sup>79</sup> applies to stationary compression ignition (CI) engine greater than 50 brake horsepower and sets limits on emissions and operating hours. In general, new stationary emergency standby diesel-fueled engines greater than 50 brake horsepower are not permitted to operate more than 50 hours per year for maintenance and testing.

**South Coast Air Quality Management District CEQA Air Quality Handbook**

In 1993, the SCAQMD prepared its *CEQA Air Quality Handbook* (CEQA Handbook) to assist local government agencies and consultants in preparing environmental documents for projects subject to CEQA,<sup>80</sup> the SCAQMD is in the process of developing its *Air Quality Analysis Guidance Handbook (Guidance Handbook)* to replace the CEQA Handbook. The *Guidance Handbook* describes the criteria that SCAQMD uses when reviewing and commenting on the adequacy of environmental documents. Although the *Guidance Handbook* is still being prepared, the *Guidance Handbook* provides the most up-to-date recommended thresholds of significance in order to determine if a project will have a significant adverse environmental impact. SCAQMD provides additional supplementation information including methodologies for estimating project emissions and mitigation measures that can be implemented to

79 SCAQMD, Rule 1470 - Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines

80 SCAQMD, Air Quality Analysis Guidance Handbook, <http://www.aqmd.gov/CEQA/hdbk.html>. 2010. Accessed September 2021.

avoid or reduce air quality impacts on the Guidance Handbook website. Although the Governing Board of the SCAQMD has not adopted the *Guidance Handbook* and is in the process of developing the *Guidance Handbook*, the SCAQMD does not, nor does it intend to, supersede a local jurisdiction's CEQA procedures.<sup>81</sup>

**Multiple Air Toxics Exposure Study**

To date, the most comprehensive study on air toxics in the Basin is the Multiple Air Toxics Exposure Study (MATES IV),<sup>82</sup> conducted between July 2012 and June 2013. The monitoring program measured more than 30 air pollutants including both gases and particulates. The study concluded that the average of the modeled air toxics concentrations measured at each of the monitoring stations in the Basin equates to a background cancer risk of approximately 418 in one million primarily due to diesel exhaust. Subsequent to SCAQMD's risk calculation estimates, the OEHHA updated the methods for estimating cancer risks.<sup>83</sup> The updated method utilizes higher estimates of cancer potency during early life exposures and uses different assumptions for breathing rates and length of residential exposures. However, DPM remains the largest component of air toxics estimated risk.

SCAQMD is in the process of conducting the MATES V study.<sup>84</sup> This would involve the addition of an advanced monitoring network which would include account flight-based measurements, a mobile laboratory, an optical tent, sensor networks, and community engagement.

***Southern California Association of Governments (SCAG)*****SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS)**

SCAG is the metropolitan planning organization (MPO) for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for the discussion of regional issues related to transportation, the economy, community development, and the environment. As the federally-designated MPO for the Southern California region, SCAG is mandated by the federal government to research and develop plans for transportation, hazardous waste management, and air quality. Pursuant to California

81 SCAQMD, "Frequently Asked CEQA Questions," <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/frequently-asked-questions>. Accessed September 2021.

82 SCAQMD, *Multiple Air Toxics Exposure Study (MATES-IV) in the South Coast Air Basin*, May 1, 2015, <http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-iv>. Accessed September 2021.

83 *California Office of Environmental Health Hazard Assessment (OEHHA), Air Toxics Hot Spots Program (February 2015)*, <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf>. Accessed September 2021.

84 SCAQMD, *MATES V Multiple Air Toxics Exposure Study*, <http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v>. Accessed September 2021.

#### 4.2 Air Quality

Health and Safety Code Section 40460(b),<sup>85</sup> SCAG has the responsibility for preparing and approving the portions of the AQMP relating to regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is also responsible under the CAA for determining conformity of transportation projects, plans, and programs with applicable air quality plans.

With regard to air quality planning, SCAG has prepared and adopted the 2020–2045 RTP/SCS,<sup>86</sup> which includes a SCS that addresses regional development and growth forecasts, including the development of the ITC project. The SCAG 2020–2045 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals, with a specific goal of achieving an 8 percent reduction in passenger vehicle GHG emissions on a per capita basis by 2020, 19 percent reduction by 2035, and 21 percent reduction by 2040 compared to the 2005 level. Although the RTP/SCS is not technically an air quality plan, consistency with the RTP/SCS has air quality implications, including the reduction of VMT which reduces air quality emissions.

#### 4.2.4.4 Local Regulations

##### City

##### General Plan

California State law requires every city and county to adopt a comprehensive General Plan to guide its future development. The proposed Project is located entirely within the City. The City General Plan<sup>87</sup> includes the following elements: Land Use, Circulation, Safety, Noise, Housing, Open Space, and Conservation.

##### Land Use Element

The following goals from the Land Use Element<sup>88</sup> of the City General Plan are relevant to air pollutant emissions.

<sup>85</sup> California Health and Safety Code, Division 26. Air Resources, PART 3. Air Pollution Control Districts, Chapter 5.5. South Coast Air Quality Management District, ARTICLE 5. Plan, Section 40460(b). Accessed September 2021. [https://leginfo.ca.gov/faces/codes\\_displaySection.xhtml?sectionNum=40460.&lawCode=HSC](https://leginfo.ca.gov/faces/codes_displaySection.xhtml?sectionNum=40460.&lawCode=HSC)

<sup>86</sup> Southern California Association of Governments (SCAG), Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Draft, "Chapter 1," <https://www.connectsocial.org/Pages/Connect-SoCal-Draft-Plan.aspx>. Accessed September 2021.

<sup>87</sup> City of Inglewood, Department of Community Development and Housing, General Plan. January 1980

<sup>88</sup> City of Inglewood, Department of Community Development and Housing, 1980. Land Use Element of the Inglewood General Plan. January 1980. Amended September 14, 2016.

#### 4.2 Air Quality

**Circulation Goal:** Promote and support adequate public transportation within the City and the region.

**Circulation Goal:** Develop a safe and adequate pedestrian circulation system which is barrier free for the handicapped.

##### Conservation Element

The City's General Plan Conservation Element addresses the conservation, development, and use of natural resources.<sup>89</sup> Five specific areas of conservation and/or protection that are identified in the Conservation Element include (1) oil and gas production, (2) water production and provision for domestic use, (3) storm water runoff and wastewater, (4) hazardous waste and solid waste disposal, and (5) air pollution. The Conservation Element notes the following pollution-reducing measures:

- reducing volatile emissions from factories and refineries;
- reducing airborne particulate matter from factories and construction sites;
- reducing numbers of vehicles being driven while increasing the utilization of high occupancy vehicles and alternative transportation;
- requiring improvements to engine efficiency to decrease emissions; and
- increasing the use of clean fuel vehicles.

##### Environmental Justice Element

The following goals from the Environmental Justice Element<sup>90</sup> of the City General Plan are relevant to air pollutant emissions.

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

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

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

<sup>89</sup> City of Inglewood General Plan, "Conservation Element" (1997), General Plan. January 1980.

<sup>90</sup> City of Inglewood, Department of Community Development and Housing, 1980. Environmental Justice Element of the Inglewood General Plan. April 2020.

## Energy and Climate Action Plan

The City adopted an Energy and Climate Action Plan<sup>91</sup> (ECAP) in 2013 to guide Citywide GHG emissions reduction efforts. The ECAP established four primary compliance paths which projects may choose to adhere to, including: ministerial and exempt project status, implementation of a combination of sustainable development standards, performance-based compliance, or payment of an in-lieu fee. These measures were developed on a points-based system, which were chosen because they have been demonstrated by various studies to directly reduce GHG emissions or support changes in activities that lead to GHG emissions reductions. Each Climate-Ready Development Standard has a point value associated with it that reflects its general effectiveness at reducing GHG emissions. The standards apply to various types of projects, and a qualifier is included denoting which types of projects may implement the standard. Applicants have discretion regarding which measures that they would want their project to comply with; however, for a project to be fully compliant with the goals of the ECAP it must incorporate features meeting the standards sufficient to accrue a total of 20 points. The following two of the five strategies and their related actions included in the ECAP also have the potential for co-benefits of reducing criteria air pollutants and TACs:

- **Strategy 1: Lead by Example with Municipal Government Actions**
  - Accelerate city vehicle fleet replacement
  - Continue commute trip reduction program
  - Planning for electric vehicle infrastructure
- **Strategy 4: Improve Transportation Options and Manage Transportation Demand**
  - Make roadways more efficient
  - Improve transit
  - Improve bicycle facilities
  - Make parking more efficient
  - Reduce commute trips
  - Encourage land use intensification and diversity

<sup>91</sup> City of Inglewood, Inglewood Energy and Climate Action Plan, March 2013, <https://www.cityofinglewood.org/DocumentCenter/View/148/Inglewood-Energy-and-Climate-Action-Plan-ECAP-Adopted-2013-PDF>. Accessed September 2021.

## 4.2.5 EXISTING CONDITIONS

### 4.2.5.1 Regional Meteorology

Air quality is affected by the rate, amount, and location of pollutant emissions and the associated meteorological conditions that influence pollutant movement and dispersal. Atmospheric conditions, including wind speed, wind direction, stability, and air temperature, in combination with local surface topography (i.e., geographic features such as mountains, valleys, and Pacific Ocean), determine the effect of air pollutant emissions on local air quality.

In general, Southern California has a warm, dry Mediterranean climate; hot in the summer and mild in the winter. Temperatures are cooler near the coast and hotter near inland areas. Most of the precipitation occurs as rain during the winter months, although rain showers are common during the summer in higher-elevation desert areas. Average annual precipitation is approximately 19 inches and temperatures reach 90 degrees Fahrenheit 100 days of the year on average. August daily highs average 95 degrees while daily lows average 64 degrees Fahrenheit. January typically exhibits average daily highs of 68 degrees and average daily lows of 43 degrees Fahrenheit. The predominant wind directions are either out of the northwest or southeast. Gusts greater than 15 miles per hour occur infrequently, less than two percent of the time.

Basin climate increases the potential to create air pollution problems. Air quality within the Basin generally rates from fair to poor. Sinking or subsiding air from the Pacific High-Pressure System creates a temperature inversion (known as a subsidence inversion), which acts as a lid to vertical movement of air masses and dispersion of pollutants. The lower bound of this inversion at any given time is known as the “mixing height.” Restricted maximum mixing heights are 3,500 feet above sea level or less. Weak summertime pressure gradients suppress winds and further limit horizontal dispersion of pollutants in the mixed layer below the subsidence inversion. Poorly dispersed anthropogenic (human-made) emissions, combined with strong sunshine, lead to photochemical reactions that create ozone (O<sub>3</sub>) in this surface layer. Daytime onshore air flow (i.e., sea breeze) and nighttime offshore flow (i.e., land breeze) are quite common in Southern California. The sea breeze helps to moderate daytime temperatures and leads to air pollutants being blown out to sea at night and returning to land the following day.

### 4.2.5.2 Existing Ambient Air Quality

The proposed Project is located within the South Coast Air Basin (Basin) which covers approximately 6,745 square miles and is bounded by the Pacific Ocean to the west and south and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes all of Orange County; the nondesert portions of Los Angeles, Riverside, and San Bernardino counties; and the San Gorgonio Pass area in Riverside County.

The Basin has some of the worst air pollution in the country. The air pollution problems are a consequence of the combination of emissions from the nation's second largest urban area, meteorological conditions unfavorable to the dispersion of those emissions, and mountainous terrain surrounding the Basin that traps pollutants as they are pushed inland with the sea breeze. Southern California also has abundant sunshine, which drives the photochemical reactions that form pollutants such as ozone (O<sub>3</sub>) and a significant portion of particulate matter with an aerodynamic diameter less than or equal to 2.5 (PM<sub>2.5</sub>).<sup>92</sup>

The City has been ranked in the 8th percentile of cities for the best overall mild weather.<sup>93</sup> Average temperatures in the vicinity range from the mid-60s to mid-70s Fahrenheit to the upper 40s to low 60s Fahrenheit. The warmest periods tend to be from June to October. Winter precipitation usually consists of low-pressure systems dependent up the size and location of the upper-level jet stream. Summer rainfall usually consists of periodic and short-term scattered thunderstorms that are formed by an extension of the North American monsoon pattern that dominates over the southwestern United States.

The SCAQMD maintains a network of monitoring stations within the Basin that monitor air quality and compliance with applicable ambient standards. The nearest air monitoring station which measures CO, NO<sub>2</sub>, SO<sub>2</sub>, and PM<sub>10</sub> is located near Los Angeles International Airport (7201 West Westchester Parkway, Southwest Coastal LA County, Station 820), four miles to the west of the proposed Project. The nearest air monitoring station which measures PM<sub>2.5</sub> is located in central Los Angeles (1630 North Main Street, Central LA, Station 087), ten miles to the northeast of the proposed Project.

### Regional Air Quality

The Basin's meteorological conditions, in combination with regional topography, are conducive to the formation and retention of ozone. Pollutant concentrations in the Basin vary with location, season, and time of day. Concentrations of ozone, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Basin and adjacent desert.<sup>94</sup> The worst air pollution conditions throughout the Basin typically occur from June through September.

### Attainment Status

California Health and Safety Code section 39607(e) requires CARB to establish and periodically review area designation criteria. **Table 4.2-2: South Coast Air Basin Attainment Status (Los Angeles County)** provides a summary of the attainment status of the Los Angeles County portion of the Basin with respect to the federal and State standards. As shown, the Basin is designated under federal or State ambient air quality standards as nonattainment for ozone, PM<sub>10</sub>, and fine particulate matter PM<sub>2.5</sub>. It is noteworthy to mention that air quality in the Basin has improved substantially over the years, primarily due to the impacts of air quality control programs at the federal, State, and local levels. The ozone and PM levels have fallen

92 SCAQMD, *Final 2016 Air Quality Management Plan* (2016), <https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>. Accessed September 2021.

93 City of Inglewood, "About the City," <https://www.cityofinglewood.org/493/About-the-City>. Accessed September 2021.

94 South Coast Air Quality Management District, 2017. *Final 2016 Air Quality Management Plan*. March 2017.

significantly compared to the worst years and are expected to continue to trend downward in the future despite increases in the economy and population in the Basin.<sup>95</sup>

**Table 4.2-2**  
**South Coast Air Basin Attainment Status (Los Angeles County)**

Pollutant	Federal Standards	California Standards
O <sub>3</sub> (1-hour standard)	N/A <sup>a</sup>	Nonattainment
O <sub>3</sub> (8-hour standard)	Nonattainment – Extreme	Nonattainment
CO	Attainment	Attainment
NO <sub>2</sub>	Attainment	Attainment
SO <sub>2</sub>	Attainment	Attainment
PM <sub>10</sub>	Attainment	Nonattainment
PM <sub>2.5</sub>	Nonattainment	Nonattainment
Lead	Nonattainment (Partial, Los Angeles County) <sup>b</sup>	Attainment
Visibility Reducing Particles	N/A	Unclassified
Sulfates	N/A	Attainment
Hydrogen Sulfide	N/A	Unclassified
Hydrogen Sulfide	N/A	N/A <sup>c</sup>

*Notes:*

N/A = not applicable

<sup>a</sup> The NAAQS for 1-hour ozone was revoked on June 15, 2005, for all areas except Early Action Compact areas.

<sup>b</sup> Partial Nonattainment designation – Los Angeles County portion of the Air Basin only for near-source monitors.

<sup>c</sup> In 1990, CARB identified vinyl chloride as a TAC and determined that it does not have an identifiable threshold. Therefore, CARB does not monitor or make status designations for this pollutant.

Source: USEPA, *The Green Book Nonattainment Areas for Criteria Air Pollutants*, <https://www.epa.gov/green-book>; CARB, *Area Designations Maps/State and National*, <http://www.arb.ca.gov/desig/adm/adm.htm>.

With respect to the State-identified criteria air pollutants (sulfates, hydrogen sulfide, visibility reducing particles, and vinyl chloride) present in **Table 4.2-2**, the proposed Project would either not use these pollutants in the day to day operations or during construction and therefore would not have emissions of those pollutants (hydrogen sulfide, vinyl chloride, and lead), or such emissions would be accounted for as part of the pollutants estimated in this analysis (visibility reducing particles are associated with particulate matter emissions, and sulfates are associated with SO<sub>2</sub>). Vinyl chloride is used in the process of making polyvinyl chloride (PVC) plastic and vinyl products and is primarily emitted from industrial processes.<sup>96</sup> Vinyl chloride would not be emitted directly during operations or during construction; therefore, there would be no project emissions of vinyl chloride. In addition, CARB determined there is not sufficient scientific evidence available to support the identification of a threshold exposure level for vinyl chloride, therefore, CARB does not monitor or make status designations for this pollutant.<sup>97</sup>

95 South Coast Air Quality Management District, 2017. *Final 2016 Air Quality Management Plan*. March 2017, p. 1-6.

96 California Air Resources Board, Vinyl Chloride & Health, <https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health>. Accessed September 2021.

97 California Air Toxics Board, Toxic Air Contaminant Board, Toxic Air Contaminant Identification List, <https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants>. Accessed September 2021.

**Table 4.2-3: Air Quality Data Summary** summarizes the most recent three years of data (2017 through 2019) from the nearby air monitoring stations (SCAQMD Station Nos. 091 and 820). The ozone standard was not exceeded. The State annual PM<sub>10</sub> standard was exceeded in 2018 and the State 24-hour PM<sub>10</sub> standard was exceeded in 2019. The State annual PM<sub>2.5</sub> standard was exceeded in 2018 and the State 24-hour PM<sub>2.5</sub> standard was exceeded in 2019. No other exceedances were observed at the nearby air monitoring stations in 2017 through 2019.

**Table 4.2-3**  
**Air Quality Data Summary (2017–2019)**

Pollutant	Monitoring Data by Year			
	Standard	2017	2018	2019
<b>Ozone</b>				
Highest 1 Hour Average (ppm)	0.09	0.086	0.074	0.082
Days over State Standard	—	0	0	0
Highest 8 Hour Average (ppm)	0.070	0.070	0.065	0.067
Days over National Standard	—	0	0	0
Days over State Standard	—	0	0	0
<b>Nitrogen Dioxide</b>				
Highest 1 Hour Average (ppm)	0.180/0.100	0.072	0.060	0.057
Days over State Standard	—	0	0	0
Annual Average (ppm)	0.030/0.053	0.009	0.009	0.010
<b>Carbon Monoxide</b>				
Highest 1 Hour Average (ppm)	20.0	2.1	1.8	1.8
Days over State Standard	—	0	0	0
Highest 8 Hour Average (ppm)	9.0	1.6	1.5	1.3
Days over State Standard	—	0	0	0
<b>Particulate Matter (PM<sub>10</sub>)</b>				
Highest 24 Hour Average (µg/m <sup>3</sup> )	50	46	45	<b>62</b>
Days over State Standard	—	0	0	2
State Annual Average (µg/m <sup>3</sup> )	20	19.8	<b>20.5</b>	19.2
<b>Particulate Matter (PM<sub>2.5</sub>)</b>				
Highest 24 Hour Average (µg/m <sup>3</sup> )	35	27.8	30.5	<b>43.5</b>
Days over National Standard	—	0	0	1
State Annual Average (µg/m <sup>3</sup> )	12	11.9	<b>12.6</b>	10.9

Notes: Values in **bold** are in excess of at least one applicable standard.

Generally, State, and national standards are not to be exceeded more than once per year.

ppm = parts per million; µg/m<sup>3</sup> = micrograms per cubic meter.

PM<sub>10</sub> is not measured every day of the year. Number of estimated days over the standard is based on 365 days per year.

Source: South Coast Air Quality Management District, Annual Air Quality Summaries, <http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year>. Accessed September 2021.

#### 4.2.5.3 Adjusted Baseline

The Air Quality analysis assumes the Adjusted Baseline Environmental Setting as described in **Section 4.0**; see **Table 4.0-1** for the details of the Adjusted Baseline. Related to air quality, the changes associated with

the Hollywood Park Specific Plan (HPSP) Adjusted Baseline projects, currently under development and anticipated to be operational prior to construction of the proposed Project, include operational air emissions associated with new uses in the HPSP area.

The HPSP projects in the Adjusted Baseline would emit air pollutants associated with vehicle trips, maintenance operations, energy consumption, etc., from all of its operational land uses. Specifically, vehicle trips associated with activities at the HPSP would take place during 2020 and would have an impact on local and regional air quality. Accordingly, the air pollutant emissions associated with this development within the HPSP area are considered as part of the Adjusted Baseline. No other changes to the existing environmental setting related to air quality would occur under the Adjusted Baseline.

#### 4.2.5.4 Existing Emissions

Implementation of the proposed Project would require the acquisition of a number of full and partial property and air rights acquisitions and easements or leases for construction and operation of the guideway, stations, MSF, and other support facilities included in the proposed Project (See **Section 3.0** for a detailed discussion of the existing land uses that would be demolished as part of the proposed Project). Presently, a variety of commercial, restaurant, and retail uses that exist where the components of the proposed Project would be constructed. These existing uses currently generate air quality emissions from building operation.

**Table 4.2-4: Existing Emissions for Existing Uses** identifies the existing emissions from the existing uses that would be removed as part of the proposed Project.

**Table 4.2-4**  
**Existing Emissions for Existing Uses (lb./day)**

Source	VOC	CO	NOx	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>
Area (Consumer Products, Landscaping)	6.77	0.03	<0.01	<0.01	<0.01	<0.01
Energy (Natural Gas)	0.20	1.56	1.85	0.14	0.14	0.01
Motor Vehicles	38.9	1,327	141	55.8	23.6	3.78
<b>Total</b>	<b>45.9</b>	<b>1,329</b>	<b>143</b>	<b>55.9</b>	<b>23.7</b>	<b>3.79</b>

Source: See **Appendix G.1**.

In addition to mobile emissions for the Adjusted Baseline projects, emissions for existing uses that will be removed have been estimated. This includes mobile, area and energy emissions for existing uses that will be removed.

#### 4.2.5.5 Sensitive Receptors

Within one quarter mile of the proposed Project guideway, stations, and the MSF site, 61 sensitive receptors have been identified as shown in **Figure 4.0-2**.

Land uses such as schools, children’s daycare centers, hospitals, and convalescent homes are considered to be more sensitive than the general public to poor air quality because the population groups associated with these uses have increased susceptibility to respiratory distress. Persons engaged in strenuous work or exercise also have increased sensitivity to poor air quality. The CARB and SCAQMD have identified the following people as most likely to be affected by air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes, and those with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive population groups.

Residential areas are considered more sensitive to air quality conditions than commercial and industrial areas because people generally spend longer periods of time at their residences, resulting in greater exposure to ambient air quality conditions. Recreational uses are also considered sensitive, due to the greater exposure to ambient air quality conditions and because the presence of pollution detracts from the recreational experience. Off-site workers within industrial and commercial areas surrounding the proposed Project area are also considered sensitive receptors by the SCAQMD.

#### 4.2.6 THRESHOLDS OF SIGNIFICANCE

The proposed Project would have a significant impact in relation to air quality if it were to:

- Threshold AQ-1: Conflict with or obstruct implementation of the applicable air quality plan.**
- Threshold AQ-2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.**
- Threshold AQ-3: Expose sensitive receptors to substantial pollutant concentrations.**

The following criteria was used to evaluate air quality impacts:

##### 4.2.6.1 SCAQMD CEQA Air Quality Handbook

Because of the SCAQMD’s regulatory role in the Basin, the significance thresholds and analysis methodologies in the SCAQMD’s *CEQA Air Quality Handbook*<sup>98</sup> are used in evaluating project impacts for construction, operations, and air toxics.<sup>99</sup>

<sup>98</sup> SCAQMD, Air Quality Analysis Guidance Handbook, <http://www.aqmd.gov/CEQA/hdbk.html>. Accessed September 2021.

<sup>99</sup> South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, March 2015, <http://www.aqmd.gov/ceqa/hdbk.html>. Accessed September 2021.

#### Daily Emissions Thresholds

SCAQMD has identified thresholds to determine the significance of regional air quality emissions for construction activities and project operation, as shown in **Table 4.2-5: Mass Daily Emissions Thresholds**.

#### Construction Emissions

In addition to the mass daily thresholds, a project would result in a significant construction air quality impact if the Project exceeds the concentration significance thresholds set forth in **Table 4.2-6: Ambient Air Quality Significance Thresholds for Criteria Pollutants**. Per SCAQMD guidance, the evaluated concentrations of CO, NO<sub>2</sub>, and SO<sub>2</sub> includes both the project contribution plus background concentrations. The total concentration is then compared to the significance thresholds. For CO, NO<sub>2</sub>, and SO<sub>2</sub>, these significance thresholds are reflective of the CAAQS and NAAQS. Background concentrations were based on existing air monitoring stations near the proposed Project and represent existing air emissions sources within the Basin. Per SCAQMD guidance, the Project contribution of PM<sub>10</sub> and PM<sub>2.5</sub> is compared to the significance thresholds without adding background concentrations.

**Table 4.2-5**  
**Mass Daily Emissions Thresholds**

Pollutant	Construction	Operation
	Significant Threshold (pounds/day)	
Volatile organic compounds (VOCs)	55	55
Nitrogen dioxide (NO <sub>x</sub> )	100	55
Carbon monoxide (CO)	550	550
Sulfur dioxide (SO <sub>x</sub> )	150	150
Respirable particulate matter (PM <sub>10</sub> )	150	150
Fine particulate matter (PM <sub>2.5</sub> )	55	55

Source: South Coast Air Quality Management District, “SCAQMD Air Quality Significance Thresholds” (last revised March 2015).

#### Operational Emissions

In addition to the mass daily thresholds above, a project would normally have a significant impact on air quality from project operations if any of the following would occur:

- Operational emissions were to exceed 10 tons per year of VOCs or any of the daily thresholds presented above in **Table 4.2-5** (as reprinted from the CEQA Air Quality Handbook);<sup>100</sup>
- Either of the following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:
  - The project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 parts per million (ppm), respectively; or
  - The incremental increase due to the project is equal to or greater than 1.0 ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard.

**Table 4.2-6**  
**Ambient Air Quality Significance Thresholds for Criteria Pollutants**

Pollutant	Averaging Period	Pollutant Concentration Threshold
CO	1-hour /8-hour	SCAQMD is in attainment (federal and State); project is significant if it causes or contributes to an exceedance of the attainment standards of 20 ppm (1-hour) and 9 ppm (8-hour)
NO <sub>2</sub>	1-hour	SCAQMD is in attainment (federal and state); project is significant if it causes or contributes to an exceedance of the following attainment standard 0.18 ppm (state)
	Annual	0.03 ppm (state) and 0.0534 ppm (federal)
PM <sub>10</sub>	24-hour	10.4 µg/m <sup>3</sup> (construction) and 2.5 µg/m <sup>3</sup> (operation)
	Annual	1.0 µg/m <sup>3</sup> (construction and operation)
PM <sub>2.5</sub>	24-hour	10.4 µg/m <sup>3</sup> (construction) and 2.5 µg/m <sup>3</sup> (operation)
SO <sub>2</sub>	1-hour	0.25 ppm (state) and 0.075 ppm (federal)
	24-hour	0.04 ppm (state)
Lead	30-day Average	1.5 µg/m <sup>3</sup> (state)
	Rolling 3-month Average	0.15 µg/m <sup>3</sup> (federal)

Source: South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, March 2015, <http://www.aqmd.gov/ceqa/hdbk.html>. Accessed September 2021.

### Health Risk Assessment (Toxic Air Contaminants)

Per SCAQMD, a project would result in a significant health impact if the carcinogenic or toxic air contaminants individually or cumulatively are equal to or exceed the maximum individual cancer risk of ten in one million persons or a chronic and acute hazard index of 1.0, or the cancer burden of 0.5 excess cancer cases (in areas greater than or equal to one in one million).

101 SCAQMD, Air Quality Analysis Guidance Handbook, <http://www.aqmd.gov/CEQA/hdbk.html>. Accessed September 2021.  
102 SCAQMD, Final Air Quality Management Plan (AQMP). Approved March 3, 2017. <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>. Accessed September 2021.

### 4.2.6.2 Consistency with Applicable Plans and Policies

The consistency analysis addresses consistency with the SCAQMD's AQMP,<sup>101</sup> the 2020-2045 SCAG RTP/SCS,<sup>102</sup> and policies included within the City's General Plan<sup>103</sup> and ECAP.<sup>104</sup>

### 4.2.7 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

**Impact AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?**

The proposed Project includes ITC Design Standards and Guidelines (Design Guidelines) and a Construction Commitment Program (CCP) as described in **Section 3.0: Project Description**. The CCP addresses temporary effects during construction of the proposed Project. The Guidelines describe the design features of the proposed Project.

#### 4.2.7.1 Project Design Features

The proposed Project includes the following features that address air quality emissions during construction of the ATS:

##### PDF AQ-1 Construction Air Quality Program

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

101 SCAQMD, Final Air Quality Management Plan (AQMP). Approved March 3, 2017. <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>. Accessed September 2021.

102 Southern California Association of Governments (SCAG), Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Final Plan, <https://www.connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>. Accessed September 2021.

103 City of Inglewood, *Department of Community Development and Housing, General Plan*. January 1980

104 City of Inglewood, Inglewood Energy and Climate Action Plan, March 2013, <https://www.cityofinglewood.org/DocumentCenter/View/148/Inglewood-Energy-and-Climate-Action-Plan-ECAP-Adopted-2013-PDF>. Accessed September 2021.

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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

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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.

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- Contractors shall maintain and operate construction equipment to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications and documentation demonstrating proper maintenance, in accordance with the manufacturer's specifications, shall be maintained on site. Tampering with construction equipment to increase horsepower or to defeat emission control devices must be prohibited.
- Require in all applicable bid documents, purchase orders, and contracts of the requirement to notify all construction vendors, contractors, and/or haul truck operators that vehicle and construction equipment idling time will be limited to no longer than five minutes, consistent with the CARB's policy. For any idling that is expected to take longer than five minutes, the engine should be shut off. Notify construction vendors, contractors, and/or haul truck operators of these idling requirements at the time that the purchase order is issued and again when vehicles enter the Project area. To further ensure that drivers understand the vehicle idling requirement, post signs at the proposed Project entry gates and throughout the Project alignment, where appropriate, stating that idling longer than five minutes is not permitted.

The following analysis addresses consistency of the proposed Project with applicable plans and policies that regulate air quality. In particular, the analysis addresses consistency with SCAQMD's AQMP, which as discussed above, is an air quality plan that includes strategies for achieving attainment of applicable ozone, PM<sub>10</sub>, and PM<sub>2.5</sub> standards. The analysis also includes consistency with SCAG's 2020-2045 RTP/SCS which establishes strategies for achieving improvements in air quality. In addition, consistency with the air quality related policies in the City General Plan Land Use Element, Conservation, and Environmental Justices are also addressed. Finally, this analysis addresses consistency with the City's ECAP, which includes strategies to mitigate the City's impacts on air quality and climate change.

#### 2016 Air Quality Management Plan

As discussed above, SCAQMD has adopted a series of AQMPs to lead the Basin into compliance with several criteria air pollutant standards and other federal requirements, while taking into account construction and operational emissions associated with population and economic growth projections provided by SCAG's RTP/SCS.<sup>105</sup>

The current AQMP is the Final 2016 Air Quality Management Plan (2016 AQMP)<sup>106</sup> and is the regional blueprint for achieving air quality standards in the South Coast Air Basin, an area that includes Orange County and the nondesert portions of Los Angeles, Riverside and San Bernardino counties.

105 Southern California Association of Governments (SCAG), Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Draft, "Chapter 1," <https://www.connectsocial.org/Pages/Connect-SoCal-Draft-Plan.aspx>, Accessed September 2021.  
106 South Coast Air Quality Management District, Final 2016 Air Quality Management Plan, March 2017.

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The 2016 AQMP represents a thorough analysis of existing and potential regulatory control options, includes available, proven, and cost-effective strategies, and seeks to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The 2016 AQMP recognizes the critical importance of working with other agencies to develop funding and incentives that encourage the accelerated transition to cleaner vehicles, and the modernization of buildings and industrial facilities to cleaner technologies in a manner that benefits not only air quality, but also local businesses and the regional economy.

SCAQMD recommends that, when determining whether a project is consistent with the relevant AQMPs, the lead agency should assess whether the project would directly obstruct implementation of the plans by impeding SCAQMD's efforts to achieve attainment with respect to any criteria air pollutant for which it is currently not in attainment of the NAAQS and CAAQS (e.g., ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>) and whether it is consistent with the demographic and economic assumptions (typically land use related, such as employment and population/residential units) upon which the plan is based.<sup>107</sup> SCAQMD guidance indicates that projects whose growth is included in the projections used in the formulation of the 2016 AQMP are considered to be consistent with the plan and would not interfere with its attainment.<sup>108</sup>

#### Construction

##### Control Strategies

During construction, the proposed Project would comply with CARB's requirements to minimize short-term emissions from on-road and off-road diesel equipment, including the ATCM to limit heavy duty diesel motor vehicle idling to no more than 5 minutes at any given time, and with SCAQMD's regulations such as Rule 403<sup>109</sup> for controlling fugitive dust and Rule 1113<sup>110</sup> for controlling VOC emissions from architectural coatings. Furthermore, the proposed Project would use vehicles from vendors that comply with fleet rules to reduce on-road truck emissions under CARB's Truck and Bus regulation.<sup>111</sup> Compliance with these measures and requirements would be consistent with and meet or exceed the 2016 AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

Even though the proposed Project would be consistent with local and State construction regulations, and other voluntary measures designed to reduce nonattainment pollutants, regional emissions during

107 South Coast Air Quality Management District, Air Quality Analysis Handbook, pp. 12-2, 12-3, <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>. Accessed September 2021.

108 South Coast Air Quality Management District, 1993. CEQA Air Quality Handbook, p. 12-1. November 1993

109 SCAQMD, "Rule 403: Fugitive Dust", <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>. Accessed September 2021.

110 SCAQMD, "Rule 1113: Architectural Coatings", <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-1113.pdf>. Accessed September 2021.

111 California Air Resources Board, Truck and Bus Regulation. <https://ww2.arb.ca.gov/our-work/programs/truck-and-bus-regulation/about>. Accessed September 2021.

construction would exceed the significance threshold for NOx prior to application of mitigation. Specifically, as shown in **Table 4.2-8**, emissions during construction for 2024 (146 lbs./day), 2025 (128 lbs./day), and 2026 (118 lbs./day) would exceed the SCAQMD's mass threshold of 100 lbs./day. Other criteria pollutants are not predicted to exceed regional mass emission thresholds during construction.

#### **Growth Strategies**

The proposed Project would result in an increase in short-term employment compared to existing conditions (see **Section 4.11: Population, Employment, and Housing**). Although the proposed Project would generate construction jobs during the construction process, construction-related jobs generated would likely be filled by employees within the construction industry within the City and the greater Los Angeles County region. Construction industry jobs generally have no regular place of business, as construction workers commute to job sites throughout a given region, which may change several times a year. Moreover, these jobs would be temporary in nature. Therefore, the construction jobs generated by the proposed Project would not conflict with the long-term employment or population projections upon which the 2016 AQMP is based.

However, as the proposed Project would exceed the NOx SCAQMD threshold, construction impacts would be potentially significant.

#### **Operation**

##### **Transportation Strategies**

The 2016 AQMP includes land use and transportation strategies from the SCAG RTP/SCS that are intended to reduce VMT and resulting regional mobile source emissions. The majority of the transportation strategies are to be implemented by cities, counties, and other regional agencies such as SCAG and SCAQMD, although some can be furthered by individual development projects.

The 2016 AQMP forecasts emissions inventories up to the year 2031 "with growth" through a detailed consultation process with SCAG.<sup>112</sup> The region is projected to see a 12 percent growth in population, 16 percent growth in housing units, 23 percent growth in employment, and 8 percent growth in vehicle miles traveled between 2012 and 2031.

The proposed Project is a transit system that spans the length of approximately 1.6 miles and would be located near existing residential, office, retail, and commercial land uses which generate vehicle trips on local roadways within the City. The proposed Project would provide direct connections between the Metro K Line, and other transit providers as well as the City's major activity centers, such as The Forum, the LASED

<sup>112</sup> South Coast Air Quality Management District, *Final 2016 Air Quality Management Plan*, March 2017. P. 3-10.

and HPSP including SoFi stadium, and IBEC. Implementation of the proposed Project would provide an alternate mode of transportation within the City and reduce VMT.

As further discussed in **Section 4.12**, in 2027 the proposed Project would have a daily weekday ridership of 3,574 passengers on a non-event day, and a daily weekday ridership of 29,280 passengers on an NFL event day. Moreover in 2045 the proposed Project would have a daily weekday ridership of 4,462 passengers on a non-event day, and a daily weekday ridership of 34,650 passengers on an NFL event day.

As these increases in public transit ridership reduce potential vehicle trips and air quality emissions, VMT estimates for the six operational scenarios are derived from travel demand modeling in the Transportation Study (see **Appendix O**) and are further discussed in **Section 4.12**. The proposed Project would reduce daily and annual VMT compared to a no-Project scenario. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce VMT accordingly when compared to the baseline scenarios without the proposed Project.

The proposed Project will help manage and support the City's projected growth by providing transit within a safe and accessible walking distance to thousands of new residents, housing units and jobs. The proposed Project's connection from the City's new housing and employment centers, and sports and entertainment venues, to the Metro K Line and larger regional and State rail system will result in significant benefits for both the City and southern California region.

#### **Growth Strategies**

As noted, the 2016 AQMP indicates that the region is projected to see a 12 percent growth in population, 16 percent growth in housing units, and 23 percent growth in employment.<sup>113</sup> According to SCAG's 2020-2045 RTP/SCS, approximately 8,389,000 jobs were available in 2016 across industries in the region and the number of jobs available will increase to 10,050,000 by 2045, an increase of approximately 0.62 percent annually in jobs.<sup>114</sup> Similarly, SCAG projects that the population in the region will increase from approximately 18,832,418 in 2016 to 22,507,188 in 2045, resulting in an increase of approximately 0.61 percent annually.

As discussed previously, implementation of the proposed Project would require the acquisition of a number of full and partial property and air rights acquisitions and easements or leases for construction and operation of the guideway, stations, MSF, and other support facilities included in the proposed Project. As such, the proposed Project would result in a reduction of jobs from existing uses. However, the

<sup>113</sup> South Coast Air Quality Management District, *Final 2016 Air Quality Management Plan*, March 2017. P. 3-10.

<sup>114</sup> SCAG. Draft 2020-2045 Connect SoCal Demographics And Growth Forecast.  
[https://www.connectsocial.org/Documents/Draft/dConnectSoCal\\_Demographics-And-Growth-Forecast.pdf](https://www.connectsocial.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf). Accessed September 2021.

reduction of jobs at existing commercial and retail uses to accommodate the proposed Project would not result in a reduction in jobs in the local job market. Other ongoing and proposed developments and construction in downtown Inglewood and the nearby area, such as the HPSP and the LASED, which are both adjacent to the proposed Project, would provide additional job and employment opportunities.

An adequate workforce exists and is projected to remain in existence, creating capacity to meet the employment needs of the proposed Project during operation. Further, with the current development of new employment opportunities in the City as well as the region, displacement of any existing workers can be absorbed. Therefore, this growth would not conflict with the 2016 AQMP.

As such, operation of the proposed Project would not conflict with the 2016 AQMP and impacts would be less than significant.

#### 2020-2045 RTP/SCS

SCAG has prepared and adopted the 2020–2045 RTP/SCS,<sup>115</sup> which includes an SCS that addresses regional development and growth forecasts. The SCAG 2020–2045 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals, with a specific goal of achieving an 8 percent reduction in passenger vehicle GHG emissions on a per capita basis by 2020, 19 percent reduction by 2035, and 21 percent reduction by 2040 compared to the 2005 level. Although the RTP/SCS is not technically an air quality plan, consistency with the RTP/SCS has air quality implications, including the reduction of VMT which reduces air quality emissions.

Currently, the City contains roughly 8,900 housing units and 14,414 employees within one half mile of the proposed Project. By 2040, these areas are projected to increase to roughly 12,875 households, and 38,326 employees.<sup>116</sup> These increases represent a growth rate of approximately 45 percent in households and 166 percent in employment. In comparison to the SCAG region, these projections translate into the City (within a ½ mile of the proposed Project) experiencing almost twice as much growth rate in housing, and more than seven times as much growth rate in employment by 2040.

As part of its vision, the 2020-2045 RTP/SCS includes Connect SoCal;<sup>117</sup> Connect SoCal charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation

<sup>115</sup> Southern California Association of Governments (SCAG), *Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Final Plan*, <https://www.connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>. Accessed September 2021.

<sup>116</sup> City of Inglewood, *Transit and Intercity Rail Program (TIRCP) Application for the City of Inglewood Transit Connector Project*, January 16, 2020.

<sup>117</sup> Southern California Association of Governments (SCAG), *Connect SoCal, The 2020-2045 Regional Transportation Plan/Sustainable Community Strategy of the Southern California Association of Governments*, <https://www.connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>. Accessed September 2021.

networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. To augment Connect SoCal's Core Vision, Connect SoCal includes new initiatives at the intersection of land use, transportation, and technology to close the gap and reach our greenhouse gas reduction goals. As part of the planning vision, Connect SoCal looks to complete "last mile" mobility as part of its sustainability goals, Connect SoCal builds upon with regional initiatives that link the built environment and transportation system with policies, projects and programs that strengthen and enhance each other beyond what each would accomplish in isolation.<sup>118</sup>

As part of the state's mandate to reduce per-capita GHG emissions from automobiles and light trucks, Connect SoCal presents strategies and tools that are consistent with local jurisdictions' land use policies and incorporate best practices for achieving the state-mandated reductions in GHG emissions at the regional level through reduced per-capita vehicle miles traveled. These strategies identify how the SCAG region can implement Connect SoCal and achieve related GHG reductions. SCAG works to support local jurisdictions and partnerships by identifying ways to implement the SCS in a way that fits the vision and needs of each local community.

The following Connect SoCal strategies are intended to be supportive of implementing the regional SCS and are applicable to the proposed Project:

#### **Focus Growth Near Destinations & Mobility Options**

- Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets.
- Encourage design and transportation options that reduce the reliance on and number of solo car trips.

#### **Support Implementation of Sustainability Policies**

- Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions.

As noted previously, the proposed Project's is approximately 1.6 miles in length and would be located near existing residential, office, retail, and commercial land uses which generate vehicle trips on local roadways within the City. The proposed Project would provide direct connections between the Metro K Line, and other transit providers as well as the City's major activity centers, such as The Forum, the LASED and HPSP

<sup>118</sup> Southern California Association of Governments (SCAG), *Connect SoCal, The 2020-2045 Regional Transportation Plan/Sustainable Community Strategy of the Southern California Association of Governments*, p. 4 <https://www.connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>. Accessed September 2021.

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including SoFi stadium, and IBEC. Implementation of the proposed Project would provide an alternate mode of transportation within the City and decrease VMTs.

The 2020-2045 RTP/SCS states that expanding the transit network is central to the region's plan for meeting mobility and sustainability goals while continuing to grow the regional economy.<sup>119</sup> The proposed Project provides connection to the Metro K Line and achieves the last mile/first mile goals of the 2020-2045 RTP/SCS. Further, the proposed Project is consistent with and assisting in achieving Connect SoCal strategies and incorporates best practices for achieving the state-mandated reductions in GHG emissions at the regional level through reduced per-capita VMT.

As such, the proposed Project would not conflict with the 2020–2045 RTP/SCS and impacts would be less than significant.

#### Inglewood General Plan

The City General Plan includes the following elements: Land Use, Circulation, Safety, Noise, Housing, Open Space, and Conservation.

#### Land Use Element

The following goals from the Land Use Element<sup>120</sup> of the City General Plan are relevant to air pollutant emissions.

**Circulation Goal:** Promote and support adequate public transportation within the City and the region.

**Circulation Goal:** Develop a safe and adequate pedestrian circulation system which is barrier free for the handicapped.

#### Conservation Element

The City's General Plan Conservation Element addresses the conservation, development, and use of natural resources.<sup>121</sup> Five specific areas of conservation and/or protection that are identified in the Conservation Element include (1) oil and gas production, (2) water production and provision for domestic

119 Southern California Association of Governments (SCAG), Connect SoCal, The 2020-2045 Regional Transportation Plan/Sustainable Community Strategy of the Southern California Association of Governments, Chapter 3. <https://www.connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>, Accessed September 2021.

120 City of Inglewood, Department of Community Development and Housing, 1980. Land Use Element of the Inglewood General Plan. January 1980. Amended September 14, 2016.

121 City of Inglewood General Plan, "Conservation Element" (1997), General Plan. January 1980.

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use, (3) storm water runoff and waste water, (4) hazardous waste and solid waste disposal, and (5) air pollution.<sup>122</sup> The Conservation Element notes the following pollution-reducing measures:

- Reducing airborne particulate matter from factories and construction sites;
- Reducing numbers of vehicles being driven while increasing the utilization of high occupancy vehicles and alternative transportation;
- Requiring improvements to engine efficiency to decrease emissions; and
- Increasing the use of clean fuel vehicles.

#### Environmental Justice Element

The following goals from the Environmental Justice Element<sup>123</sup> of the City General Plan are relevant to air pollutant emissions.

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

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

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

The proposed Project would comply with CARB's requirements to minimize short-term emissions from on-road and off-road diesel equipment, including the ATCM to limit heavy duty diesel motor vehicle idling to no more than 5 minutes at any given time, and with SCAQMD's regulations such as Rule 403<sup>124</sup> for controlling fugitive dust and Rule 1113<sup>125</sup> for controlling VOC emissions from architectural coatings. Furthermore, the proposed Project would comply with fleet rules to reduce on-road truck emissions under CARBs Truck and Bus regulation.<sup>126</sup> Compliance with these measures and requirements would be

122 City of Inglewood General Plan, "Conservation Element" (1997), General Plan. January 1980.

123 City of Inglewood, Department of Community Development and Housing, 1980. Environmental Justice Element of the Inglewood General Plan. April 2020.

124 SCAQMD, "Rule 403: Fugitive Dust", <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>. Accessed September 2021.

125 SCAQMD, "Rule 1113: Architectural Coatings", <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-1113.pdf>. Accessed September 2021.

126 California Air Resources Board, Truck and Bus Regulation. <https://ww2.arb.ca.gov/our-work/programs/truck-and-bus-regulation/about>. Accessed September 2021.

consistent with and meet or exceed the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

Once in operation, the proposed Project would result in a decrease in emissions for criteria pollutants (see **Impact AQ-2**). This would include reductions in 2027 for VOC of 10.8 lbs./day, CO of 378.0 lbs./day, NOx of 77.0 lbs./day, PM<sub>2.5</sub> of 28.6 lbs./day, PM<sub>10</sub> of 12.0 lbs./day and SO<sub>2</sub> of 1.63 lbs./day. As discussed previously, the proposed Project would provide direct connections between the Metro K Line, and other transit providers as well as the City's major activity centers, such as the Forum, the LASED and HPSP including SoFi stadium, and IBEC. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce per-capita VMT.

For these reasons, the proposed Project would not conflict with Inglewood General Plan policies related to air quality and impacts would be less than significant.

#### **Inglewood Energy and Climate Action Plan**

As described above, the City's ECAP includes strategies to mitigate the City's impacts on air quality and climate change. While these strategies are primarily directed towards GHG emission reductions, the measures in the City's ECAP would also achieve co-benefits of reducing criteria air pollutants and TACs. The strategies that apply to the proposed Project include:

- **Strategy 1: Lead by Example with Municipal Government Actions**
  - Continue commute trip reduction program
- **Strategy 4: Improve Transportation Options and Manage Transportation Demand**
  - Make roadways more efficient
  - Improve transit
  - Make parking more efficient
  - Reduce commute trips

As discussed, the proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Metro K Line, and other transit providers as well as the City's major activity centers, such as the Forum, the LASED and HPSP including SoFi stadium, and IBEC. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce per-capita VMT. The proposed Project would be consistent with Strategy 1 as City would provide local transit that would connect to regional transit thereby allowing for commuters to reduce vehicle travel. The proposed Project would be consistent with Strategy 4 in that roadway improvements would provide for efficient travel along

Manchester and Boulevard and Prairie Avenue, would improve transit by connecting the Downtown area with other employment and entertainment areas of the City, and would provide efficient parking within the Downtown area nearby transit options.

The proposed Project would be consistent with the City ECAP, and impacts would be less than significant.

#### **Summary**

##### **Construction**

The proposed Project would comply with CARB's requirements to minimize short-term emissions from on-road and off-road diesel equipment, including the ATCM to limit heavy duty diesel motor vehicle idling to no more than 5 minutes at any given time, and with SCAQMD and CARB regulations. Compliance with these measures and requirements would be consistent with and meet or exceed the 2016 AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

Even though the proposed Project would be consistent with applicable local and State construction regulations, and other voluntary measures designed to reduce nonattainment pollutants, regional emissions during construction of the proposed Project would exceed the significance threshold for NOx, an ozone precursor. Other criteria pollutants are not predicted to exceed regional mass emission thresholds during construction. However, as the proposed Project would exceed the NOx SCAQMD threshold during construction, impacts would be potentially significant.

##### **Operation**

The proposed Project will help manage and support the City's projected growth by providing transit within a safe and accessible walking distance to thousands of new residents, housing units and jobs. The proposed Project's connection from the City's new housing and employment centers, and sports and entertainment venues, to the Metro K Line and larger regional and State rail system will result in significant air quality benefits for both the City and southern California region.

The proposed Project provides a transit connection and is consistent with the last mile/first mile goals of the 2020-2045 RTP/SCS.<sup>127</sup> The proposed Project would provide direct connections between the Metro K Line, and other transit providers as well as the City's major activity centers, such as The Forum, the LASED and HPSP, and IBEC; as such, implementation of the proposed Project would provide an alternate mode of transportation within the City and decrease vehicle ridership and thereby VMT. The proposed Project is

<sup>127</sup> Southern California Association of Governments (SCAG), *Connect SoCal*, The 2020-2045 Regional Transportation Plan/Sustainable Community Strategy of the Southern California Association of Governments, *Chapter 3*. <https://www.connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>, Accessed September 2021.

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consistent with and assisting in achieving Connect SoCal strategies and incorporate best practices for achieving the State-mandated reductions in GHG emissions at the regional level through reduced per-capita VMT.

Once in operation, the proposed Project would result in a decrease in emissions for criteria pollutants (see **Impact AQ-2**). This would include reductions in 2027 for VOC of 10.8 lbs./day, CO of 378.0 lbs./day, NOx of 77.0 lbs./day, PM<sub>2.5</sub> of 28.6 lbs./day, PM<sub>10</sub> of 12.0 lbs./day and SO<sub>2</sub> of 1.63 lbs./day.

For these reasons, the proposed Project would not conflict with the goals and policies of relevant regional plans or the Inglewood General Plan policies related to air quality.

**Mitigation Measures**

**MM AQ-1:** PDF AQ-1, Construction Air Quality Program, shall be implemented during construction of the ITC Project.

As described above, the proposed Project’s CCP includes **PDF AQ-1** which would reduce air quality emissions during construction of the proposed Project. **Mitigation Measure MM AQ-1** incorporates **PDF AQ-1** into the post-mitigated modeling for construction of the proposed Project.

**Level of Significance after Mitigation**

**Construction**

As shown in **Table 4.2-14**, below, regional emissions during construction of the proposed Project would not exceed the significance threshold for NOx after implementation of **MM AQ-1**

Impacts would be less than significant with mitigation.

**Operation**

As previously explained, the proposed Project is consistent with the 2016 AQMP, the 2020-2045 RTP/SCS, and the City’s General Plan and ECAP. Impacts relative to the operation of the proposed Project with these plans is less than significant.

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**Impact AQ-2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?**

The region is designated as a nonattainment area for several pollutants, including O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Construction and operation of the Project would result in direct and indirect impacts that could cumulatively affect air quality for nonattainment pollutants, namely PM<sub>10</sub> and PM<sub>2.5</sub>.

A cumulatively considerable increase in emissions would occur if the proposed Project’s impacts substantially contributed to air quality violations when considering other projects that may undertake construction activities at the same time. SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above in **Table 4.2-5** also be considered cumulatively considerable.<sup>128</sup>

**Construction**

Prior to construction of the proposed Project, reconstruction of the existing Vons store proposed for demolition to accommodate construction of the MSF is planned on the corner of Manchester Boulevard and Hillcrest Boulevard. This proposed replacement Vons store would include amenities similar to the existing store, including a pharmacy and bank branch. **Table 4.2-7: Daily Unmitigated Construction Emissions for Vons Replacement** below shows the construction emissions that would occur during development of the Vons store replacement prior to construction of the proposed Project.

**Table 4.2-7  
Daily Unmitigated Construction Emissions for Vons Replacement**

Source	VOC	CO	NOx	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>
	pounds/day					
Maximum	6.51	16.35	15.22	1.30	0.78	0.04
SCAQMD Mass Daily Threshold	75	550	100	150	55	150
<b>Threshold exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Refer to **Appendix G.2**.  
Notes: CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.

128 White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, SCAQMD Board Meeting, September 5, 2003, Agenda No. 29, Appendix D, p. D-3.

As shown in **Table 4.2-7**, construction of the Vons store replacement would not exceed regional VOC, NOx, CO, SOx, PM<sub>10</sub>, and PM<sub>2.5</sub> concentration thresholds. Moreover, these emissions would be temporary and would occur prior to construction of the proposed ITC Project.

Construction of the proposed ITC Project has 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 the proposed Project. In addition, fugitive dust emissions would result from demolition and various soil-handling activities. Mobile source emissions, primarily NOx and PM emissions (i.e., PM<sub>10</sub> and PM<sub>2.5</sub>), would result from the use of diesel powered on- and off-road vehicles and equipment.

#### Intermittent (short-term) Construction Emissions Analysis

Intermittent (short-term) construction emissions that occur from construction of the proposed Project were evaluated for each construction year (2024 through 2027). The air quality analysis focuses on maximum daily emissions from construction activities (mobile, area, stationary, and fugitive sources) and compares the emission estimates to thresholds of significance identified by the SCAQMD and based on the SCAQMD *Air Quality Handbook*.<sup>129</sup>

**Table 4.2-8: Daily Unmitigated Construction Emissions for Proposed Project** shows the estimated daily unmitigated emissions for construction related emissions (including combustion engine and fugitive dust emissions) for the proposed Project. The grand total construction emissions as well as the contribution from employee vehicle trips, pickup/delivery trucks, haul trucks, and off-road equipment are presented. The off-road equipment represents the largest contribution to the total construction emissions. The daily unmitigated NOx construction emissions could potentially exceed the SCAQMD thresholds of significance during 2024 through 2026.

As shown on **Table 4.2-8**, daily emissions for criteria pollutants during construction would exceed significance thresholds for NOx (100 lbs./day) in 2024 (146 lbs./day), 2025 (128 lbs./day), and 2026 (118 lbs./day) prior to the application of PDF AQ-1. As such, proposed Project construction impacts for NOx emissions would be potentially significant. Based on SCAQMD's policy, this would be a cumulatively considerable increase in emissions that could increase future exceedances of ozone, a nonattainment pollutant. For all other criteria pollutants, the construction impact would be less than significant.

<sup>129</sup> South Coast Air Quality Management District, CEQA Air Quality Handbook, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>. Accessed September 2021.

**Table 4.2-8**  
**Daily Unmitigated Construction Emissions for Proposed Project**

Construction Year	VOC	CO	NOx	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>
	pounds/day					
<b>Grand Total</b>						
2024	14.7	227	<b>146</b>	8.01	5.72	0.59
2025	13.0	196	<b>128</b>	7.70	5.23	0.61
2026	11.1	205	<b>118</b>	7.77	5.00	0.51
2027	0.41	23.1	7.22	0.60	0.28	0.03
Significance Thresholds	75	550	100	150	55	150
<b>Employee Vehicles</b>						
2024	0.63	19.3	1.73	1.19	0.50	0.07
2025	0.54	16.7	1.42	1.09	0.45	0.06
2026	0.79	24.1	1.98	1.66	0.69	0.09
2027	0.12	3.52	0.28	0.25	0.10	0.01
<b>Pickup/Delivery Trucks</b>						
2024	0.33	8.06	3.82	0.80	0.35	0.05
2025	0.41	9.62	4.48	1.05	0.46	0.07
2026	0.58	15.0	6.88	1.80	0.78	0.11
2027	0.10	2.74	1.02	0.29	0.13	0.02
<b>Haul Trucks</b>						
2024	0.11	0.77	13.4	1.40	0.63	0.08
2025	0.12	0.94	16.3	1.71	0.77	0.10
2026	0.07	0.51	8.89	0.94	0.42	0.05
2027	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
<b>Off-road Equipment</b>						
2024	13.6	199	<b>127</b>	4.61	4.24	0.38
2025	11.9	169	<b>105</b>	3.85	3.54	0.38
2026	9.65	166	<b>100</b>	3.37	3.10	0.26
2027	0.19	16.9	5.92	0.06	0.05	<0.01

Note: Values in **bold** are in excess of applicable standard.  
Source: See **Appendix G.1**.

#### Operation

As discussed previously, reconstruction of the existing Vons store to be removed is proposed on the corner of Manchester Boulevard and Hillcrest Boulevard. **Table 4.2-9: Operational Air Quality Emissions – Vons Replacement** below shows the operational emissions that would be generated by the Vons store replacement prior to construction of the proposed Project.

Regional air emissions from the proposed Project were assessed based on the incremental increase/decrease in emissions compared to Adjusted Baseline conditions (i.e., existing on-site or off-site Project-related emissions), consistent with SCAQMD methodology.

Operational emissions are based on the estimates for operation of the station components of the proposed Project (ATS trains, stations, and MSF). Operation emissions also include mobile emissions that would result from worker commute trips and deliveries for supplies, maintenance, and other needs.

**Table 4.2-9  
Operational Air Quality Emissions – Vons Replacement**

Source	VOC	CO	NOx	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>
pounds/day						
Total Emissions <sup>a</sup>	1.04	0.24	0.26	0.02	0.02	<0.01

Refer to **Appendix G.2**.

Notes: CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.

<sup>a</sup> Total emissions do not include mobile emissions which are analyzed separately utilizing VMT estimates from the Transportation Study (**Appendix D**).

As discussed, the proposed Project would include operations at the MSF facility which would generate air quality emissions from both area and stationary sources. **Table 4.2-10: Operational Air Quality Emissions – Normal Conditions** identifies the operational emissions from the MSF, stations, and other stationary components of the proposed Project. As shown, all emission for criteria pollutants emissions from operation of the proposed Project under normal operating conditions would be less than the existing emissions.

**Table 4.2-10  
Operational Air Quality Emissions – Normal Conditions**

Source	VOC	CO	NOx	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>
Employee Trips	0.27	8.50	0.46	0.60	0.25	0.03
Deliveries	0.03	0.27	0.34	0.08	0.04	0.00
Area (Consumer Products, Landscaping)	2.56	0.04	0.00	0.00	0.00	0.00
Energy Source (Natural Gas)	0.07	0.53	0.63	0.05	0.05	0.00
<b>Subtotal Project (Typical Operations)</b>	<b>2.92</b>	<b>9.34</b>	<b>1.42</b>	<b>0.73</b>	<b>0.33</b>	<b>0.04</b>

Source: See **Appendix G.1**.

**Table 4.2-11: Estimated Daily Operational Emissions/Reductions for Proposed Project Motor Vehicles** presents the daily criteria air pollutant emissions for the six operational scenarios based on VMTs with and without the proposed Project. As shown, the proposed Project daily criteria air pollutant emissions are less than the daily criteria air pollutant emissions without the proposed Project.

Impacts related to proposed Project operation would be less than significant.

**Table 4.2-11  
Estimated Daily Operational Emissions/Reductions for Proposed Project Motor Vehicles**

Scenario	VOC	CO	NOx	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>
	pounds/day					
Adjusted Baseline (2020) Nonevent Weekday without the proposed Project	473	12,315	3,088	403	194	28.3
Adjusted Baseline (2020) Nonevent Weekday with the proposed Project	467	12,156	3,048	398	191	28.0
Year 2027 with Event Weekday without the proposed Project	230	8,060	1,642	609	255	34.7
Year 2027 with Event Weekday with the proposed Project	219	7,682	1,565	581	243	33.0
Year 2045 with Event Weekday without the proposed Project	185	6,728	1,532	653	269	31.5
Year 2045 with Event Weekday with the proposed Project	175	6,352	1,447	616	254	29.7
Incremental Change	pounds/day					
Year 2027 with Event Weekday with the proposed Project vs Year 2027 with Event Weekday without the proposed Project	(10.8)	(378)	(77.0)	(28.6)	(12.0)	(1.63)
Year 2045 with Event Weekday with the proposed Project vs Year 2045 with Event Weekday without the proposed Project	(10.4)	(377)	(85.8)	(36.5)	(15.0)	(1.76)

Source: See **Appendix G.1**.

Vendor specifications were used to determine air pollutants emission factors for the standby generators. Emission factors are 5.27 g/hp-hour for NOx, 0.5 g/hp-hour for CO, 0.18 g/hp-hour for VOC, and 0.4 g/hp-hour for PM<sub>10</sub>/PM<sub>2.5</sub>. The estimated annual fuel usage assuming each generator operates for 50 hours per year (2 hours per day) is 27,440 gallons of diesel fuel.<sup>130</sup>

As shown in **Table 4.2-12: Estimated Daily Emissions for Proposed Project Backup Generators**, current estimated emissions for each of the criteria pollutants are noted. As shown, daily emissions for each of

<sup>130</sup> Vender Specifications for Standby Generator, [https://www.cat.com/en\\_US/products/new/power-systems/electric-power.html](https://www.cat.com/en_US/products/new/power-systems/electric-power.html). Accessed September 2021.

the backup generators are estimated to be 4.26 lbs./day for VOC, 11.8 lbs./day for CO, 125 lbs. day for NOx, 0.95 lbs./day for PM<sub>10</sub>, 0.95 lbs./day for PM<sub>2.5</sub> and 8.68 lbs./day for SO<sub>2</sub>.

Because the backup generators would only run for emergency conditions when the main electrical power was not available, and for regular testing, the emissions would be limited to only those periods and would not be an ongoing operational activity. Nevertheless, their emissions are included in the overall assessment of operational emissions to ensure a conservative analysis. Further, because the emissions from the operation of the proposed Project would regularly be less than the significance thresholds for NOx, and in fact would result in net negative emissions, the long-term impacts would be less than significant from the use of the backup generators.

**Table 4.2-12**  
Estimated Daily Emissions (pounds) for Proposed Project Backup Generators

Source	VOC	CO	NOx	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>
(lbs. per day)						
Emergency Generator <sup>1</sup>	4.26	11.8	125	0.95	0.95	8.68

Source: See Appendix G.1.

Notes:

Values in **bold** are in excess of applicable standard.

<sup>1</sup> Emissions are for each generator operating up to 2 hours per day for either emergency power needs or testing proposes.

### Health Impacts

A description of adverse health effects from pollutants is provided above under 4.2.2.2: *Health Effects of Pollutants*. In terms of correlating the emissions of regional pollutants to health impacts, it takes a very large amount of additional precursor emissions to cause a modeled increase in ambient ozone levels over an entire region. As shown in **Table 4.2-13** below, the proposed Project would result in a net reduction in air quality emissions. Therefore, operation of the Project will not contribute to adverse health impacts related to emissions of criteria pollutants on a regional basis. A discussion of the potential for the Project to expose sensitive receptors to a substantial increase in pollutant concentrations and the Health Risk Assessment for emissions during construction are discussed below in Impact AQ-3.

### Summary

**Table 4.2-13: Estimated Total Daily Emissions for Proposed Project** presents the daily criteria air pollutant operational emissions under normal operations including employee trips, deliveries, area sources, energy sources (natural gas), motor vehicle, while accounting for the reduction in motor vehicle as a result of the proposed Project and elimination of existing sources. Also presented are the typical daily emissions plus

O&M for the standby generators (one generator tested per day for 2 hours) associated with the proposed Project operations (e.g., 126 pounds of NOx). As shown, the typical daily emissions associated with the proposed Project operations would result in a net negative emissions. Therefore, the proposed Project operations would have a less than significant (and beneficial) impact on air quality and would not result in cumulatively considerable increases that for nonattainment pollutants ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>.

**Table 4.2-13**  
Estimated Total Daily Emissions for Proposed Project

Source	VOC	CO	NOx	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>
(lbs. per day)						
Employee Trips	0.27	8.50	0.46	0.60	0.25	0.03
Deliveries	0.03	0.27	0.34	0.08	0.04	0.00
Area (Consumer Products, Landscaping)	2.56	0.04	0.00	0.00	0.00	0.00
Energy Source (Natural Gas)	0.07	0.53	0.63	0.05	0.05	0.00
<b>Subtotal Project (Normal Operations)</b>	<b>2.92</b>	<b>9.34</b>	<b>1.42</b>	<b>0.73</b>	<b>0.33</b>	<b>0.04</b>
Emergency Generators	4.26	11.8	125	0.95	0.95	8.68
<b>Subtotal Project (Normal Operations + O&amp;M)</b>	<b>7.18</b>	<b>21.2</b>	<b>126</b>	<b>1.67</b>	<b>1.28</b>	<b>8.72</b>
Motor Vehicles	-10.8	-378	-77.0	-28.6	-12.0	-1.63
<b>Subtotal (Project with Motor Vehicle Reductions)</b>	<b>-3.62</b>	<b>-357</b>	<b>49.0</b>	<b>-26.9</b>	<b>-10.7</b>	<b>7.09</b>
Existing Condition	-45.9	-1,329	-143	-55.9	-23.6	-3.79
Vons Replacement Store	1.04	0.24	0.26	0.02	0.02	<0.01
<b>Grand Total (Project)</b>	<b>-44.9</b>	<b>-1,328.8</b>	<b>-142.7</b>	<b>-55.9</b>	<b>-23.6</b>	<b>-3.8</b>
Significance Threshold	55	550	55	150	55	150
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: See Appendix G.1.

Notes: Standby generator values based on vendor specifications. Employee trips and deliveries values based on EMFAC. Area sources and energy (Natural Gas) values based on CalEEMod. Existing Condition values based on **Table 4.2-4**.

### Mitigation Measures

As described above, the proposed Project's CCP includes **PDF AQ-1** which would reduce air quality emissions during construction of the proposed Project. **MM AQ-1** incorporates **PDF AQ-1** into the post-mitigated modeling for construction of the proposed Project. **PDF-AQ 1** describes a number of specific actions to reduce construction NOx emissions from on-road vehicles and off-road equipment used in construction activities.

**MM AQ-1:** PDF AQ-1, Construction Air Quality Program, shall be implemented during construction of the ITC Project.

#### Level of Significance after Mitigation

##### Construction

**MM AQ-1** incorporates **PDF AQ-1** from the proposed Project's CCP and was included in the post-mitigation modeling for construction of the proposed Project. Specifically, **PDF AQ-1** would require the use of equipment that meets the USEPA's Final Tier 4 emissions standards for off-road diesel-powered construction equipment with 50 hp or greater, for all phases of construction activity, or the use of equipment that would achieve equivalent emissions reductions. Additionally, **PDF AQ-1** would require construction vendors, contractors, and/or haul truck operators to commit to using 2010 model year, or equivalent, trucks. **PDF AQ-1** would also require the use of electric or alternatively fueled (e.g., natural gas) sweepers with HEPA filters. Compliance with these mitigation measures would result in substantial reductions in emissions of VOC, NOx PM<sub>10</sub>, and PM<sub>2.5</sub> compared to fleet-wide average emissions for heavy-duty construction equipment and trucks in the southern California region.

**Table 4.2-14: Daily Mitigated Construction Emissions for Proposed Project** shows the estimated daily mitigated emissions for construction related emissions (including combustion engine and fugitive dust emissions) for the proposed Project including **MM AQ-1**.

The total construction emissions including the contribution from employee vehicle trips, pickup/delivery trucks, haul trucks, and off-road equipment are presented. The daily mitigated construction emissions would not exceed the SCAQMD thresholds of significance. The mitigation measures represent a reduction of approximately 3926 percent of the NOx emissions, approximately 3620 percent of the PM<sub>10</sub> emissions, and approximately 4831 percent of the PM<sub>2.5</sub> emissions. As such, construction of the proposed Project would not result a cumulatively considerable increase in emissions. Impacts would be less than significant with mitigation.

##### Operation

Operational emissions are based on the estimates for both stationary/area and energy sources for operation of the station components of the proposed Project (ATS trains, stations, and MSF) and mobile sources from worker commute trips and deliveries for supplies, maintenance, and other needs).

As shown in **Table 4.2-13**, the typical daily emissions associated with the proposed Project operations would result in a net negative emissions. Moreover, daily emissions under normal operations would be below the SCAQMD operational thresholds for all emissions.

**Table 4.2-14**  
**Daily Mitigated Construction Emissions for Proposed Project**

Construction Year	VOC	CO	NOx	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>
	pounds/day					
<b>Grand Total</b>						
2024	9.81	393	81.2	4.53	2.61	0.49
2025	10.0	383	79.7	5.03	2.85	0.52
2026	7.80	333	76.1	5.21	2.71	0.45
2027	0.31	25.2	7.80	0.55	0.24	0.03
<b>Significance Thresholds</b>	<b>75</b>	<b>550</b>	<b>100</b>	<b>150</b>	<b>55</b>	<b>150</b>
<b>Employee Vehicles</b>						
2024	0.63	19.3	1.73	1.19	0.50	0.07
2025	0.54	16.7	1.42	1.09	0.45	0.06
2026	0.79	24.1	1.98	1.66	0.69	0.09
2027	0.12	3.52	0.28	0.25	0.10	0.01
<b>Pickup/Delivery Trucks</b>						
2024	0.33	8.06	3.82	0.80	0.35	0.05
2025	0.41	9.62	4.48	1.05	0.46	0.07
2026	0.58	15.0	6.88	1.80	0.78	0.11
2027	0.10	2.74	1.02	0.29	0.13	0.02
<b>Haul Trucks</b>						
2024	0.11	0.77	13.4	1.40	0.63	0.08
2025	0.12	0.94	16.3	1.71	0.77	0.10
2026	0.07	0.51	8.89	0.94	0.42	0.05
2027	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
<b>Off-road Equipment</b>						
2024	8.74	365	62.2	1.14	1.14	0.29
2025	8.95	356	57.5	1.17	1.17	0.30
2026	6.37	293	58.3	0.81	0.81	0.20
2027	0.09	18.9	6.50	0.01	0.01	<0.01

Note: Values in **bold** are in excess of applicable standard.  
Source: See **Appendix G.1**.

As shown in **Table 4.2-13**, the daily emissions for a backup generator would exceed the NOx SCAQMD threshold. Backup generators would only run for emergency conditions when the main electrical power was not available, and for regular testing. As such, the emissions would be limited to only those periods and would not be an ongoing operational activity. Moreover, the overall reductions in emissions from operation of the Project would more than offset emissions from operation of the generators. Therefore, the proposed Project operations would have a less than significant (and beneficial) impact on air quality and would not result in cumulatively considerable increases that for nonattainment pollutants ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>. Pursuant to SCAQMD guidance, the proposed Project's operations would not result in a cumulatively considerable number of emissions of any nonattainment pollutant.

Impacts related to proposed Project operation would be less than significant.

**Impact AQ-3: Would the project expose sensitive receptors to substantial pollutant concentrations?**

#### Construction

##### *Air Dispersion Analysis*

A dispersion modeling analysis was conducted to assess related impacts to air concentrations of CO, NO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and SO<sub>2</sub> for nearby receptors within one quarter mile of the proposed Project. These receptors are designed to represent off-site locations where a person has access and can be situated for an hour or longer at a time (which is different from the HRA receptors discussed below, which are designed to represent specific residences, schools, daycares, off-site worker locations).

The ambient air quality standards analysis results are presented for both the Morning/Evening and Morning/Night construction scenarios identified in the Construction Phasing Narrative (see **Appendix F.1**). Concentrations were compared to SCAQMD's significance thresholds and California/federal ambient air quality standards as identified in **Table 4.2-6**.

##### Morning/Evening Construction Activities

Estimated emissions for the various criteria pollutants for the Morning/Evening scenario are shown in **Table 4.2-15: Estimated Unmitigated Concentration Impacts from Construction Activities for Morning/Evening Scenario**.

##### NO<sub>x</sub>

For the nearby receptors during construction for the Morning/Evening scenario, the incremental 1-hour NO<sub>2</sub> impacts to a receptor, including background concentrations, would be a maximum of 0.16 ppm, which is below the State threshold of 0.18 ppm. The maximum construction incremental annual NO<sub>2</sub> impacts to a nearby receptor, including background concentrations, would be 0.01 ppm, which is below the thresholds of 0.03 ppm (State) and below the threshold of 0.0534 ppm (federal). However, the maximum incremental 98<sup>th</sup> percentile 1-hour NO<sub>2</sub> impacts to a sensitive receptor, including background concentrations, would be 0.12 ppm, which is above the federal threshold of 0.10 ppm. As such, impacts would be potentially significant for the 1-hour NO<sub>2</sub> federal threshold of 0.10 ppm without mitigation.

##### Particulate Matter

As shown in **Table 4.2-15**, for the nearby receptors during construction, the maximum incremental 24-hour and annual PM<sub>10</sub> impacts to a sensitive receptor would be 2.79 µg/m<sup>3</sup> and 0.11 µg/m<sup>3</sup>, respectively; impacts would be below the 24-hour PM<sub>10</sub> threshold of 10.4 µg/m<sup>3</sup> and below the annual PM<sub>10</sub> threshold of 1.0 µg/m<sup>3</sup>. The construction maximum incremental 24-hour PM<sub>2.5</sub> impacts to a sensitive receptor would

be 2.42 µg/m<sup>3</sup>, which would be below the 24-hour PM<sub>2.5</sub> threshold of 10.4 µg/m<sup>3</sup>. Therefore, unmitigated construction activities would result in a less than significant air quality impact of PM<sub>10</sub> and PM<sub>2.5</sub> on nearby receptors due to construction activities.

##### CO and SO<sub>2</sub>

Concentrations of CO and SO<sub>2</sub> during the Morning/Evening scenario would not exceed significance thresholds on nearby receptors as shown in **Table 4.2-15**. Impacts of CO and SO<sub>2</sub> would be less than significant.

##### Morning/Night Construction Activities

As shown in **Table 4.2-16: Estimated Unmitigated Concentration Impacts from Construction Activities for Morning/Night Scenario**, estimated emissions for the various criteria pollutants for the Morning/Night scenario.

##### NO<sub>x</sub>

For the nearby receptors during construction for the Morning/Night scenario, the maximum construction incremental annual NO<sub>2</sub> impacts including background concentrations would be 0.01 ppm, which is below the thresholds of 0.03 ppm (State) and 0.0534 ppm (federal). However, the maximum construction incremental 1-hour NO<sub>2</sub> impacts to a receptor, including background concentrations, would be 0.20 ppm, which is above the State threshold of 0.18 ppm. Additionally, the maximum incremental 98<sup>th</sup> percentile 1-hour NO<sub>2</sub> impacts to nearby receptor, including background concentrations, would be 0.14 ppm, which is above the federal threshold of 0.10 ppm. As such, impacts would be potentially significant for the 1-hour NO<sub>2</sub> State threshold of 0.18 ppm and the 1-hour NO<sub>2</sub> federal threshold of 0.10 ppm without mitigation.

##### Particulate Matter

As shown in **Table 4.2-16**, for the nearby receptors, the construction maximum incremental 24-hour and annual PM<sub>10</sub> impacts to a receptor would be 3.75 µg/m<sup>3</sup> and 0.10 µg/m<sup>3</sup>, respectively. Impacts would be below the 24-hour PM<sub>10</sub> threshold of 10.4 µg/m<sup>3</sup> and below the annual PM<sub>10</sub> threshold of 1.0 µg/m<sup>3</sup>. The construction maximum incremental 24-hour PM<sub>2.5</sub> impacts would be 3.30 µg/m<sup>3</sup>, which would be below the 24-hour PM<sub>2.5</sub> threshold of 10.4 µg/m<sup>3</sup>. Therefore, unmitigated construction activities would result in a less than significant air quality impact of PM<sub>10</sub> and PM<sub>2.5</sub> on nearby receptors due to construction activities.

##### CO and SO<sub>2</sub>

Concentrations of CO and SO<sub>2</sub> during the Morning/Night scenario would not exceed significance thresholds on nearby receptors as shown in **Table 4.2-16**. Impacts of CO and SO<sub>2</sub> would be less than significant.

**Table 4.2-15**  
**Estimated Unmitigated Concentration Impacts from Construction Activities for Morning/Evening Scenario**  
 (Approximately 7:00 AM to 3:00 PM and 3:00 PM to 11:00 PM)

Criteria	Maximum 1-Hour NO <sub>2</sub> (ppm)	98% 1-Hour NO <sub>2</sub> (ppm)	CAAQS Annual NO <sub>2</sub> (ppm)	NAAQS Annual NO <sub>2</sub> (ppm)	24-Hour PM <sub>10</sub> (µg/m <sup>3</sup> )	Annual PM <sub>10</sub> (µg/m <sup>3</sup> )	24-Hour PM <sub>2.5</sub> (µg/m <sup>3</sup> )	CAAQS 1-Hour SO <sub>2</sub> (ppm)	NAAQS 1-Hour SO <sub>2</sub> (ppm)	24-Hour SO <sub>2</sub> (ppm)	1-Hour CO (ppm)	8-Hour CO (ppm)
Off-site Receptor (Project Increment)	0.07	0.06	<0.01	<0.01	2.79	0.11	2.42	<0.01	<0.01	<0.01	0.37	0.05
Background Concentration	0.07	0.05	0.01	0.01				0.01	0.01	<0.01	2.10	1.60
Adjusted Baseline Concentration	0.02	0.01	<0.01	<0.01				<0.01	<0.01	<0.01	1.80	0.80
<b>Total Concentration</b>	<b>0.16</b>	<b>0.12</b>	<b>0.01</b>	<b>0.01</b>	<b>2.79</b>	<b>0.11</b>	<b>2.42</b>	<b>0.01</b>	<b>0.01</b>	<b>&lt;0.01</b>	<b>4.27</b>	<b>2.45</b>
<i>Significance Threshold</i>	<i>0.18</i>	<i>0.10</i>	<i>0.03</i>	<i>0.0534</i>	<i>10.4</i>	<i>1.00</i>	<i>10.4</i>	<i>0.25</i>	<i>0.075</i>	<i>0.04</i>	<i>20.0</i>	<i>9.00</i>
Potentially Significant (Yes or No)?	No	Yes	No	No	No	No	No	No	No	No	No	No

Source: See **Appendix G.1**.  
 Total concentrations reflect rounding of values (Project increment plus background concentration). Per SCAQMD guidance, PM<sub>10</sub> and PM<sub>2.5</sub> impacts do not include background concentrations.

**Table 4.2-16**  
**Estimated Unmitigated Concentration Impacts from Construction Activities for Morning/Night Scenario**  
 (Approximately 7:00 AM to 3:00 PM and 11:00 PM to 7:00 AM)

Criteria	Maximum 1-Hour NO <sub>2</sub> (ppm)	98% 1-Hour NO <sub>2</sub> (ppm)	CAAQS Annual NO <sub>2</sub> (ppm)	NAAQS Annual NO <sub>2</sub> (ppm)	24-Hour PM <sub>10</sub> (µg/m <sup>3</sup> )	Annual PM <sub>10</sub> (µg/m <sup>3</sup> )	24-Hour PM <sub>2.5</sub> (µg/m <sup>3</sup> )	CAAQS 1-Hour SO <sub>2</sub> (ppm)	NAAQS 1-Hour SO <sub>2</sub> (ppm)	24-Hour SO <sub>2</sub> (ppm)	1-Hour CO (ppm)	8-Hour CO (ppm)
Off-site Receptor (Project Increment)	0.11	0.07	<0.01	<0.01	3.75	0.10	3.30	<0.01	<0.01	<0.01	0.69	0.06
Background Concentration	0.07	0.05	0.01	0.01				0.01	0.01	<0.01	2.10	1.60
Adjusted Baseline Concentration	0.02	0.01	<0.01	<0.01				<0.01	<0.01	<0.01	1.80	0.80
<b>Total Concentration</b>	<b>0.20</b>	<b>0.14</b>	<b>0.01</b>	<b>0.01</b>	<b>3.75</b>	<b>0.10</b>	<b>3.30</b>	<b>0.01</b>	<b>0.01</b>	<b>&lt;0.01</b>	<b>4.59</b>	<b>2.46</b>
<i>Significance Threshold</i>	<i>0.18</i>	<i>0.10</i>	<i>0.03</i>	<i>0.0534</i>	<i>10.4</i>	<i>1.00</i>	<i>10.4</i>	<i>0.25</i>	<i>0.075</i>	<i>0.04</i>	<i>20.0</i>	<i>9.00</i>
Potentially Significant (Yes or No)?	Yes	Yes	No	No	No	No	No	No	No	No	No	No

Source: See **Appendix G.1**.  
 Total concentrations reflect rounding of values (Project increment plus background concentration). Per SCAQMD guidance, PM<sub>10</sub> and PM<sub>2.5</sub> impacts do not include background concentrations.

**Health Risk Assessment**

An HRA was conducted for the proposed Project to address the potential for human health impacts associated with construction of the proposed Project. The SCAQMD thresholds of significance applied to assess project-level health impacts are the exposure of persons to substantial levels of air toxics resulting in (a) a cancer risk level greater than 10 per one million persons; or (b) a noncancerous risk (chronic or acute) hazard index greater than 1; or (c) a cancer burden of greater than 0.5 excess cancer cases.<sup>131</sup> For this threshold, sensitive receptors include residential uses, schools, daycare centers, nursing homes, medical centers, and off-site workers.

**Lifetime Cancer Risk**

The proposed Project would constitute a new emission source of DPM due to its construction activities. Studies have demonstrated that DPM from diesel-fueled engines is a human carcinogen and that chronic (long-term) inhalation exposure to DPM poses a chronic health impact. Health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. Individual cancer risk is the likelihood that a person exposed to air toxic concentrations over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology and a 30-year exposure duration. The maximally exposed individual (MEI) represents the worst-case risk estimate, based on a theoretical person being exposed for a period of 30 years at the highest concentration. This is a highly conservative assumption since most people do not remain in place all day and on average residents change residences every 11 to 12 years and do not stay in the same place of work for 25 years. In addition, this assumes that individuals are experiencing outdoor concentrations for the entire exposure period (even when indoors). A school child exposure duration is between ages 2 and 16 years old, which again, is conservative because the elementary, middle, and high school are not often located at the same location. This theoretical 30-year exposure duration also does not apply to temporary exposure during construction of the project, which will have a duration of approximately 46 months.

If incremental individual cancer risk from the proposed Project would exceed the SCAQMD regulatory threshold of an incremental increase of 10 in one million, then an estimated determination of population level risks is required (a cancer burden analysis). For the cancer burden analysis, the proposed Project risks from construction and operation impacts are evaluated for a 70-year residential scenario.<sup>132</sup>

<sup>131</sup> South Coast Air Quality Management District, 2017. Risk Assessment Procedures for Rule 1401, 1401.1, and 212, Version 8.1, September 1, 2017.

<sup>132</sup> South Coast Air Quality Management District, 2017. Risk Assessment Procedures for Rule 1401, 1401.1, and 212, Version 8.1, September 1, 2017.

**Noncarcinogenic Health Risk (Chronic and Acute)**

The HRA also evaluates the risk of potential noncarcinogenic negative health outcomes related to TACs exposure from airborne emissions during the construction of the proposed Project. For construction, the potential TAC emission sources are heavy-duty equipment used during demolition, grading and excavation, and building construction activities. The HRA followed the procedures and methods provided in the Guidance Manual for Preparation of Health Risk Assessments issued by the OEHHA in 2015<sup>133</sup> as well as the methods in the SCAQMD's Risk Assessment Procedures<sup>134</sup> used in conjunction with the associated SCAQMD Permit Application Package "N."<sup>135</sup> Noncancer effects of chronic (i.e., long-term) and acute (i.e., short-term) TAC exposure were evaluated using the Hazard Index (HI) approach consistent with the OEHHA and SCAQMD guidance.

A chronic health impact equal to or greater than 1.0 represents a significant chronic health hazard. A chronic health effect could include irritation to eyes, throat, lungs, or neurological damage. The proposed Project related TACs with known or suspected chronic health effects emitted during construction could include DPM, acetaldehyde, benzene, 1,3-butadiene, formaldehyde, and nickel.<sup>136</sup> An acute health impact equal to or greater than 1.0 represents a significant acute health hazard. An acute health effect could include irritation to eyes, throat, or lungs, sensory irritation, or coughing, chest pain or vomiting.

**Morning/Evening Construction Activities**

**Table 4.2-17: Estimated Unmitigated Health Impacts from Construction Activities for Morning/Evening Scenario** provides the proposed Project's unmitigated health impacts from construction activities for existing residences, schools, daycares, and off-site workers, and proposed residences. A large majority of the health impacts are due to off-road construction equipment operating within the proposed Project construction areas with a minimal contribution from off-site construction truck travel along nearby roadways.

As shown in **Table 4.2-17**, the maximum cancer risk from unmitigated proposed Project construction emissions for existing residential receptors would be 21.9 per one million persons. Moreover, the maximum cancer risk from unmitigated proposed Project construction emissions for proposed residential receptors would be 18.1 per one million persons. Thus, the cancer risk for residential receptors due to

<sup>133</sup> Office of Environmental Health Assessment, Air Toxic Hotspots Program, Risk Assessment Guidelines – Guidance Manual for Preparation of Health Risk Assessment, February 2015.

<https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf>

<sup>134</sup> South Coast Air Quality Management District, 2017. Risk Assessment Procedures for Rule 1401, 1401.1, and 212, Version 8.1, September 1, 2017.

<sup>135</sup> SCAQMD, Permit Application Package "N", for Use in Conjunction with the Risk Assessment Procedures for Rules 1401, 1401.1, and 212, Draft Version 8.1.

<sup>136</sup> Office of Environmental Health Hazard Assessment. Determination of Noncancer Chronic Reference Exposure Levels. February 2000.

construction activities would be potentially above the SCAQMD threshold of 10 per one million persons and would be potentially significant for residential receptors due to construction activities. The cancer burden due to construction activities would be 0.03<sup>137</sup> and below the SCAQMD threshold of 0.5 excess cancer cases and would therefore be less than significant for all residential receptors due to construction activities.

**Table 4.2-17**  
**Estimated Unmitigated Health Impacts from Construction Activities**  
**for Morning/Evening Scenario**  
**(Approximately 7:00 AM to 3:00 PM and 3:00 PM to 11:00 PM)**

Criteria	Cancer Risk	Chronic/Acute Impact
<b>Existing Residence</b>	<b>21.9</b>	0.01
Significance Threshold	10	1.0
Potentially Significant (Yes or No)?	Yes	No
<b>Off-site School/Daycare</b>	1.05	0.01
Significance Threshold	10	1.0
Potentially Significant (Yes or No)?	No	No
<b>Off-site Worker</b>	0.43	0.02
Significance Threshold	10	1.0
Potentially Significant (Yes or No)?	No	No
<b>Proposed Residence</b>	<b>18.1</b>	0.01
Significance Threshold	10	1.0
Potentially Significant (Yes or No)?	Yes	No

Note: Values in **bold** are in excess of applicable standard.  
 Source: See **Appendix G.1**.

The unmitigated chronic health impact would be 0.01, based on a proposed Project-related maximum annual diesel concentration of 0.07  $\mu\text{g}/\text{m}^3$  (per dispersion modeling analysis) or 0.07  $\mu\text{g}/\text{m}^3/5.0 \mu\text{g}/\text{m}^3$ , which is 0.01. The chronic health impact due to construction activities would be below the project-level threshold of 1 and would therefore be less than significant for all residential receptors due to construction activities.

As shown in **Table 4.2-17**, the maximum cancer risk from unmitigated proposed Project construction emissions for a school/daycare receptor would be 1.05 per one million persons. Thus, the cancer risk for school/daycare receptors due to construction activities would be below the SCAQMD threshold of 10 per

<sup>137</sup> Cancer burden is the total cancer risk for all receptors divided by the estimated population within the modeling domain.

one million persons and would be less than significant for all off-site school/daycare receptors due to construction activities.

The maximum unmitigated chronic health impact for an off-site school/daycare receptor would be 0.01. Thus, the chronic health impact due to construction activities for all off-site school/daycare receptors would be below the project-level threshold of 1 and the chronic health impact would be less than significant for all off-site school/daycare receptors due to construction activities.

As shown in **Table 4.2-17**, the maximum cancer risk from unmitigated proposed Project construction emissions for an off-site worker receptor (such as office buildings, retail centers, hotels, hospitals) would be 0.43 per one million persons. Thus, the cancer risk for an off-site worker receptor due to construction activities would be below the SCAQMD threshold of 10 per one million persons and would be less than significant for all off-site worker receptors due to construction activities.

The maximum unmitigated chronic health impact for an off-site worker receptor would be 0.02. Thus, the chronic health impact due to construction activities for all off-site worker receptors would be below the project-level threshold of 1 and the chronic health impact would be less than significant for all off-site worker receptors due to construction activities.

#### **Morning/Night Construction Activities**

**Table 4.2-18: Estimated Unmitigated Health Impacts from Construction Activities for Morning/Night Scenario** provides the proposed Project's unmitigated health impacts from construction activities for existing residences, schools, daycares, and off-site workers, and proposed residences. A large majority of the health impacts are due to off-road construction equipment operating within the proposed Project construction areas with a minimal contribution from off-site construction truck travel along nearby roadways.

As shown in **Table 4.2-18**, the maximum cancer risk from unmitigated proposed Project construction emissions for a residential receptor would be 24.7 per one million persons. Moreover, the maximum cancer risk from unmitigated proposed Project construction emissions for proposed residential receptors would be 27.8 per one million persons. Thus, the cancer risk for residential receptors due to construction activities would be potentially above the SCAQMD threshold of 10 per one million persons and would be potentially significant for residential receptors due to construction activities. The cancer burden due to construction activities would be 0.02<sup>138</sup> and below the SCAQMD threshold of 0.5 excess cancer cases and would therefore be less than significant for all residential receptors due to construction activities.

<sup>138</sup> Cancer burden is the total cancer risk for all receptors divided by the estimated population within the modeling domain.

The unmitigated chronic health impact would be 0.01, based on a proposed Project-related maximum annual diesel concentration of 0.08  $\mu\text{g}/\text{m}^3$  (per dispersion modeling analysis) or 0.08  $\mu\text{g}/\text{m}^3/5.0 \mu\text{g}/\text{m}^3$ , which is 0.01. The chronic health impact due to construction activities would be below the project-level threshold of 1 and would therefore be less than significant for all residential receptors due to construction activities.

**Table 4.2-18**  
**Estimated Unmitigated Health Impacts from Construction Activities for Morning/Night Scenario**  
**(Approximately 7:00 AM to 3:00 PM and 11:00 PM to 7:00 AM)**

Criteria	Cancer Risk	Chronic/Acute Impact
<b>Existing Residence</b>	<b>24.7</b>	0.01
Significance Threshold	10	1.0
Potentially Significant (Yes or No)?	Yes	No
<b>Off-site School/Daycare</b>	1.62	0.01
Significance Threshold	10	1.0
Potentially Significant (Yes or No)?	No	No
<b>Off-site Worker</b>	0.28	0.01
Significance Threshold	10	1.0
Potentially Significant (Yes or No)?	No	No
<b>Proposed Residence</b>	<b>27.8</b>	0.02
Significance Threshold	10	1.0
Potentially Significant (Yes or No)?	Yes	No

Note: Values in **bold** are in excess of applicable standard.  
Source: See **Appendix G1: Air Quality and Human Health Risk Assessment**.

As shown in **Table 4.2-18**, the maximum cancer risk from unmitigated proposed Project construction emissions for a school/daycare receptor would be 1.62 per one million persons. Thus, the cancer risk for school/daycare receptors due to construction activities would be below the SCAQMD threshold of 10 per one million persons and would be less than significant for all off-site school/daycare receptors due to construction activities.

The maximum unmitigated chronic health impact for an off-site school/daycare receptors would be 0.01. Thus, the chronic health impact due to construction activities for all off-site school/daycare receptors would be below the project-level threshold of 1 and the chronic health impact would be less than significant for all off-site school/daycare receptors due to construction activities.

As shown in **Table 4.2-18**, the maximum cancer risk from unmitigated proposed Project construction emissions for an off-site worker receptor (such as office buildings, retail centers, hotels, hospitals) would

be 0.28 per one million persons. Thus, the cancer risk for off-site worker receptors due to construction activities would be below the SCAQMD threshold of 10 per one million persons and would be less than significant health impacts for all off-site worker receptors due to construction activities.

The maximum unmitigated chronic health impact modeled to occur at an off-site worker receptor would be 0.01. Thus, the chronic health impact due to construction activities at all off-site worker receptors would be below the project-level threshold of 1 and would be less than significant for all off-site worker receptors due to construction activities.

### Summary

As a result of emissions from TACs for both the Morning/Evening and Morning/Night scenarios, the proposed Project, without mitigation could result in an incremental cancer risk that exceeds applicable standards, the impacts related to such exposures are potentially significant.

The proposed Project, without mitigation, would result in noncarcinogenic health risk that would be below the significance threshold of a chronic health impact of 1.0 for the maximum impacted resident, worker, school (child), and early childhood education (child) receptors and, this, this impact would be less than significant.

### Operation

As discussed in **Impact AQ-2**, the typical daily emissions associated with the proposed Project operations would result in net negative emissions. As a result, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations. Impacts from operation would be less than significant.

### Mitigation Measures

#### Construction Mitigation

As described above, the proposed Project's CCP includes **PDF AQ-1** which would reduce air quality emissions during construction of the proposed Project. **Mitigation Measure MM AQ-1** incorporates **PDF AQ-1** into the post-mitigated modeling for construction of the proposed Project.

#### Operation Mitigation

As there are no significant impacts resulting from operation of the proposed Project, no mitigation required.

**Level of Significance after Mitigation**

**Air Dispersion Analysis**

**Morning/Evening Scenario**

As noted above, during the Morning/Evening scenario the unmitigated maximum incremental 98<sup>th</sup> percentile 1-hour NO<sub>2</sub> impacts to a sensitive receptor, including background concentrations, would be 0.12 ppm, which is above the federal threshold of 0.10 ppm. As shown in **Table 4.2-19: Estimated Mitigated Concentration Impacts from Construction Activities for Morning/Evening Scenario**, for the air quality receptors during construction, the maximum incremental 98<sup>th</sup> percentile 1-hour NO<sub>2</sub> impacts to a sensitive receptor, including background concentrations, would be 0.09 ppm, which is below the federal threshold of 0.10 ppm. The maximum construction incremental annual NO<sub>2</sub> impacts including background concentrations would be 0.01 ppm, which is below the thresholds of 0.03 ppm (state) and below the threshold of 0.0534 ppm (federal). Therefore, mitigated construction activities would not exceed the 1-hour and annual NO<sub>2</sub> thresholds.

Impacts would be less than significant with incorporation of mitigation for NO<sub>2</sub> on nearby receptors during construction activities for the Morning/Evening Scenario.

**Morning/Night Scenario**

As noted above, during the Morning/Night scenario the unmitigated construction incremental 1-hour NO<sub>2</sub> impacts to a sensitive receptor, including background concentrations, would be 0.20 ppm, which is above the State threshold of 0.18 ppm. Moreover, unmitigated maximum incremental 98<sup>th</sup> percentile 1-hour NO<sub>2</sub> impacts to a sensitive receptor, including background concentrations, would be 0.14 ppm, which is above the federal threshold of 0.10 ppm. As shown in **Table 4.2-20: Estimated Mitigated Concentration Impacts from Construction Activities for Morning/Night Scenario**, for the air quality receptors, the maximum incremental 1-hour NO<sub>2</sub> impacts to a sensitive receptor, including background concentrations, would be 0.14 ppm, which is below the State threshold of 0.18 ppm. Moreover, maximum incremental 98<sup>th</sup> percentile 1-hour NO<sub>2</sub> impacts to a sensitive receptor, including background concentrations, would be 0.099 ppm, which is below the federal threshold of 0.10 ppm. The maximum construction incremental annual NO<sub>2</sub> impacts to a sensitive receptor, including background concentrations, would be 0.01 ppm, which is below the thresholds of 0.03 ppm (State) and 0.0534 ppm (federal).

Impacts would be less than significant with incorporation of mitigation for NO<sub>2</sub> on nearby receptors during construction activities for the Morning/Night Scenario.

**Table 4.2-19**  
**Estimated Mitigated Concentration Impacts from Construction Activities for Morning/Evening Scenario**  
(Approximately 7:00 AM to 3:00 PM and 3:00 PM to 11:00 PM)

Criteria	Maximum 1-Hour NO <sub>2</sub> (ppm)	98% 1-Hour NO <sub>2</sub> (ppm)	CAAQS Annual NO <sub>2</sub> (ppm)	NAAQS Annual NO <sub>2</sub> (ppm)	24-Hour PM <sub>10</sub> (µg/m <sup>3</sup> )	Annual PM <sub>10</sub> (µg/m <sup>3</sup> )	24-Hour PM <sub>2.5</sub> (µg/m <sup>3</sup> )	CAAQS 1-Hour SO <sub>2</sub> (ppm)	NAAQS 1-Hour SO <sub>2</sub> (ppm)	24-Hour Hour SO <sub>2</sub> (ppm)	1-Hour Hour CO (ppm)	8-Hour Hour CO (ppm)
Off-site Receptor (Project Increment)	0.03	0.03	<0.01	<0.01	0.83	0.05	0.64	<0.01	<0.01	<0.01	0.66	0.08
Background Concentration	0.07	0.05	0.01	0.01				0.01	0.01	<0.01	2.10	1.60
Adjusted Baseline Concentration	0.02	0.01	<0.01	<0.01				<0.01	<0.01	<0.01	1.80	0.80
<b>Total Concentration</b>	<b>0.12</b>	<b>0.09</b>	<b>0.01</b>	<b>0.01</b>	<b>0.83</b>	<b>0.05</b>	<b>0.64</b>	<b>0.01</b>	<b>0.01</b>	<b>&lt;0.01</b>	<b>4.56</b>	<b>2.48</b>
Significance Threshold	0.18	0.10	0.03	0.0534	10.4	1.00	10.4	0.25	0.075	0.04	20.0	9.00
Threshold Exceeded?	No	No	No	No	No	No	No	No	No	No	No	No

Source: See Appendix G.1.  
Total concentrations reflect rounding of values (Project Increment plus background concentration). Per SCAQMD guidance, PM<sub>10</sub> and PM<sub>2.5</sub> impacts do not include background concentrations.  
\*This value was rounded up from 0.098 and would be below the threshold of 0.10.

**Table 4.2-20**  
**Estimated Mitigated Concentration Impacts from Construction Activities for Morning/Night Scenario**  
**(Approximately 7:00 AM to 3:00 PM and 11:00 PM to 7:00 AM)**

Criteria	Maximum 1-Hour NO <sub>2</sub> (ppm)	98% 1-Hour NO <sub>2</sub> (ppm)	CAAQS Annual NO <sub>2</sub> (ppm)	NAAQS Annual NO <sub>2</sub> (ppm)	24-Hour PM <sub>10</sub> (µg/m <sup>3</sup> )	Annual PM <sub>10</sub> (µg/m <sup>3</sup> )	24-Hour PM <sub>2.5</sub> (µg/m <sup>3</sup> )	CAAQS 1-Hour SO <sub>2</sub> (ppm)	NAAQS 1-Hour SO <sub>2</sub> (ppm)	24-Hour SO <sub>2</sub> (ppm)	1-Hour CO (ppm)	8-Hour CO (ppm)
Off-site Receptor (Project Increment)	0.06	0.04	<0.01	<0.01	1.07	0.05	0.88	<0.01	<0.01	<0.01	1.27	0.11
Background Concentration	0.07	0.05	0.01	0.01			0.01	0.01	0.01	<0.01	2.10	1.60
Adjusted Baseline Concentration	0.02	0.01	<0.01	<0.01			<0.01	<0.01	<0.01	<0.01	1.80	0.80
<b>Total Concentration</b>	<b>0.14</b>	<b>0.10*</b>	<b>0.01</b>	<b>0.01</b>	<b>1.07</b>	<b>0.05</b>	<b>0.88</b>	<b>0.01</b>	<b>0.01</b>	<b>&lt;0.01</b>	<b>5.17</b>	<b>2.51</b>
Significance Threshold Exceeded?	No	No	No	No	No	No	No	No	No	No	No	No

Source: See Appendix G.1.  
 Total concentrations reflect rounding of values (Project Increment plus background concentration). Per SCAQMD guidance, PM<sub>10</sub> and PM<sub>2.5</sub> impacts do not include background concentrations.  
 \*This value was rounded up from 0.099 and would be below the threshold of 0.10.

**Health Risk Assessment**

**Morning/Evening Scenario**

As noted above, during the Morning/Evening scenario the maximum cancer risk from the unmitigated construction emissions from the proposed Project for existing residential receptors would be 21.9 per one million persons. The maximum cancer risk from unmitigated construction emissions from the proposed Project for proposed residential receptors would be 18.1 per one million persons. **Table 4.2-21: Estimated Mitigated Health Impacts from Construction Activities for Morning/Evening Scenario** provides the mitigated proposed Project health impacts from construction activities for existing residences, schools, daycares, and off-site workers, and proposed residences. A large majority of the health impacts are due to off-road construction equipment operating within the proposed Project construction areas with a minimal contribution from off-site construction truck travel along nearby roadways.

**Table 4.2-21**  
**Estimated Mitigated Health Impacts from Construction Activities for Morning/Evening Scenario**  
**(Approximately 7:00 AM to 3:00 PM and 3:00 PM to 11:00 PM)**

Criteria	Cancer Risk	Chronic/Acute
<b>Existing Off-site Residence</b>	7.21	<0.01
Significance Threshold	10	1.0
Threshold Exceeded?	No	No
<b>Off-site School/Daycare</b>	0.34	<0.01
Significance Threshold	10	1.0
Threshold Exceeded?	No	No
<b>Off-site Worker</b>	0.14	0.01
Significance Threshold	10	1.0
Threshold Exceeded?	No	No
<b>Proposed Residence</b>	5.94	<0.01
Significance Threshold	10	1.0
Threshold Exceeded?	No	No

Notes: Values in bold are in excess of applicable standard.  
 Source: See Appendix G.1.

**Residential Receptors**

As shown in **Table 4.2-21**, the maximum cancer risk from mitigated construction emissions from the proposed Project for existing residential receptors would be 7.21 per one million persons. The maximum cancer risk from mitigated construction emissions from the proposed Project for residential receptors would be 5.94 per one million persons. Thus, the cancer risk for residential receptors due to construction activities would be less than significant for all residential receptors due to construction activities. The

cancer burden due to construction activities would be 0.01<sup>139</sup> and below the SCAQMD threshold of 0.5 excess cancer cases.

The mitigated chronic health impact would be less than 0.01, based on a proposed Project-related maximum annual diesel concentration of 0.02 µg/m<sup>3</sup> (per dispersion modeling analysis) or 0.02 µg/m<sup>3</sup>/5.0 µg/m<sup>3</sup>, which is 0.01. The chronic health impact due to construction activities would be below the project-level threshold of 1.

Impacts for chronic health issues would be less than significant for all residential receptors due to construction activities.

#### School/Daycare Receptors

As shown in **Table 4.2-21**, the maximum cancer risk from mitigated proposed construction emissions for a school/daycare receptor would be 0.34 per one million persons.<sup>140</sup> Thus, the cancer risk for school/daycare receptors due to construction activities would be below the SCAQMD threshold of 10 per one million persons and would be less than significant health impacts for all school/daycare receptors due to construction activities. The maximum mitigated chronic health impact for a school/daycare receptor would be less than 0.01. The chronic health impact due to construction activities for all school/daycare receptors would be below the project-level threshold of 1.

The chronic health impact would be less than significant for all school/daycare receptors during construction activities.

#### Off-site Worker Receptor

As shown in **Table 4.2-21**, the maximum cancer risk from mitigated proposed Project construction emissions for an off-site worker receptor would be 0.14 per one million persons. Thus, the cancer risk for off-site worker receptors due to construction activities would be below the SCAQMD threshold of 10 per one million persons.

Impacts would be less than significant health impacts for all off-site worker receptors during construction activities.

The maximum mitigated chronic health impact modeled to occur at an off-site worker receptor would be 0.01. Thus, the chronic health impact due to construction activities at all off-site worker receptors would be below the project-level threshold of 1.

<sup>139</sup> Cancer burden is the total cancer risk for all receptors divided by the estimated population within the modeling domain.

<sup>140</sup> Primarily due to construction activities during year 2 (2025) and 3 (2026) within Phases 1 through 8.

Impacts for chronic health issues would be less than significant for all off-site worker receptors during construction activities.

#### Morning/Night Scenario

As noted above, the maximum cancer risk from unmitigated construction emissions from the proposed Project for existing residential receptors would be 24.7 per one million persons. The maximum cancer risk from unmitigated construction emissions from the proposed Project for proposed residential receptors would be 27.8 per one million persons. **Table 4.2-22: Estimated Mitigated Health Impacts from Construction Activities for Morning/Night Scenario** provides the mitigated proposed Project health impacts from construction activities for existing residences, schools, daycares, and off-site workers, and proposed residences. A large majority of the health impacts are due to off-road construction equipment operating within the proposed Project construction areas with a minimal contribution from off-site construction truck travel along nearby roadways.

**Table 4.2-22**  
**Estimated Mitigated Health Impacts from Construction Activities for Morning/Night Scenario**  
**(Approximately 7:00 AM to 3:00 PM and 11:00 PM to 7:00 AM)**

Criteria	Cancer Risk	Chronic/Acute Impact
<b>Existing Off-site Residence</b>	8.18	<0.01
Significance Threshold	10	1.0
Threshold Exceeded?	No	No
<b>Off-site School/Daycare</b>	0.52	<0.01
Significance Threshold	10	1.0
Threshold Exceeded?	No	No
<b>Off-site Worker</b>	0.09	<0.01
Significance Threshold	10	1.0
Threshold Exceeded?	No	No
<b>Off-site Worker</b>	9.17	0.01
Significance Threshold	10	1.0
Threshold Exceeded?	No	No

*Note: Values in bold are in excess of applicable standard.*

Source: **Appendix G.1.**

#### Residential Receptors

As shown in **Table 4.2-22**, the maximum cancer risk from mitigated construction emissions from the proposed Project for existing residential receptors would be 8.18 per one million persons. The maximum cancer risk from mitigated construction emissions from the proposed Project for proposed residential

receptors would be 9.17 per one million persons. Thus, the cancer risk for residential receptors due to construction activities would be less than significant for all residential receptors due to construction activities. The cancer burden due to construction activities would be 0.01<sup>141</sup> and below the SCAQMD threshold of 0.5 excess cancer cases.

The mitigated chronic health impact would be 0.01, based on a proposed Project-related maximum annual diesel concentration of 0.02  $\mu\text{g}/\text{m}^3$  (per dispersion modeling analysis) or 0.02  $\mu\text{g}/\text{m}^3/5.0 \mu\text{g}/\text{m}^3$ , which is 0.01. The chronic health impact due to construction activities would be below the project-level threshold of 1.

Impacts for chronic health issues would be less than significant for all residential receptors during construction activities.

#### School/Daycare Receptors

As shown in **Table 4.2-22**, the maximum cancer risk from mitigated proposed Project construction emissions for a school/daycare receptor would be 0.52 per one million persons.<sup>142</sup> Thus, the cancer risk for school/daycare receptors due to construction activities would be below the SCAQMD threshold of 10 per one million persons.

The maximum mitigated chronic health impact for all school/daycare receptors would be less than 0.01. Thus, the chronic health impact due to construction activities for all school/daycare receptors would be below the project-level threshold of 1.

The chronic health impact would be less than significant for all school/daycare receptors during construction activities.

#### Off-site Worker Receptor

As shown in **Table 4.2-22**, the maximum cancer risk from mitigated proposed Project construction emissions for an off-site worker receptor would be 0.09 per one million persons. Thus, the cancer risk for off-site worker receptors due to construction activities would be below the SCAQMD threshold of 10 per one million persons.

The maximum mitigated chronic health impact modeled to occur at an off-site worker receptor would be less than 0.01. Thus, the chronic health impact due to construction activities at all off-site worker receptors would be below the project-level threshold of 1.

<sup>141</sup> Cancer burden is the total cancer risk for all receptors divided by the estimated population within the modeling domain.

<sup>142</sup> Primarily due to construction activities during year 2 (2025) and 3 (2026) within Phases 1 through 8.

Impacts would be less than significant for all off-site worker receptors during construction activities.

#### **Summary**

The SCAQMD thresholds of significance applied to assess project-level health impacts are the exposure of persons to substantial levels of air toxics resulting in (a) a cancer risk level greater than 10 per one million persons or (b) a noncancerous risk (chronic or acute) hazard index greater than 1 or (c) a cancer burden of greater than 0.5 excess cancer cases.<sup>143</sup>

Localized impacts from criteria pollutants would be a less than significant with incorporation of mitigation measures designed to reduce NO<sub>2</sub> on nearby receptors during construction activities for the Morning/Evening and Morning/Night Scenarios during construction.

The proposed Project would result in carcinogenic health risk that would be below the significance threshold for the maximum impacted resident, worker, school (child), and early childhood education (child) receptors and, this, this impact would be less than significant with the implementation of mitigation.

Emissions of TACs would result in acute and chronic noncarcinogenic health risks below applicable standards, the impacts related to such exposures are less than significant. Therefore, the impacts related to exposing air quality sensitive receptors to substantial pollutant emissions would be less than significant with the implementation of mitigation.

#### **4.2.8 CUMULATIVE IMPACTS**

The following cumulative impact analysis is based on the recommendations provided by SCAQMD in the *Potential Control Strategies to Address Cumulative Impacts from Air Pollution White Paper*.<sup>144</sup> SCAQMD's guidance for assessing a project's cumulative impacts recommends the use of two alternative methodologies: (1) that project-specific air quality impacts be used to determine the project's potential cumulative impacts to regional air quality; or (2) that a project's consistency with the AQMPs are used to determine its potential cumulative impacts. Under SCAQMD's guidance, "[p]rojects that exceed the project-specific significance thresholds are considered by SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively

<sup>143</sup> South Coast Air Quality Management District, 2017. Risk Assessment Procedures for Rule 1401, 1401.1, and 212, Version 8.1, September 1, 2017.

<sup>144</sup> SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, August 2003. <http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf>. Accessed September 2021.

significant.” Consistent with this guidance, the potential for the proposed Project to result in cumulative impacts from regional emissions is assessed based on SCAQMD thresholds.

According to the SCAQMD, individual development projects that exceed the SCAQMD-recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

#### 4.2.8.1 Construction

The SCAQMD CEQA *Air Quality Handbook*<sup>145</sup> states: “[f]rom an air quality perspective, the impact of a project is determined by examining the types and levels of emissions generated by the project and its impact on factors that affect air quality. As such, projects should be evaluated in terms of air pollution thresholds established by the District.” According to the SCAQMD, if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD’s recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants.

During construction, the proposed Project’s unmitigated daily criteria pollutant emissions would not exceed SCAQMD thresholds, with the exception of NO<sub>x</sub>. Implementation of **MM AQ-1** would reduce potential construction-related proposed Project’s daily emissions. Construction-related daily emissions would not exceed the SCAQMD’s regional significance threshold for NO<sub>x</sub> with mitigation. As such, impacts from the proposed Project would be less than significant with mitigation and would not result in a cumulatively considerable increase of NO<sub>x</sub> during the construction period.

Unmitigated construction activities would potentially exceed the 1-hour NO<sub>2</sub> State threshold and the 1-hour NO<sub>2</sub> federal threshold at nearby receptors. However, implementation of **MM AQ-1** would reduce potential construction-related daily emissions for the proposed Project below the 1-hour NO<sub>2</sub> State threshold and the 1-hour NO<sub>2</sub> federal threshold. As such, the construction related activities would be less than significant with mitigation. All other pollutant emissions during construction would fall below the thresholds and cumulative impacts would be less than significant.

The maximum cancer risk from unmitigated proposed Project construction emissions for existing and proposed residential receptors would be potentially above the SCAQMD threshold of 10 per one million persons. However, implementation of **MM AQ-1** would reduce potential construction-related emissions for the proposed Project below the 10 per one million persons threshold. Thus, the cancer risk for existing

<sup>145</sup> SCAQMD, Air Quality Analysis Guidance Handbook, <http://www.aqmd.gov/CEQA/hdbk.html>. Accessed September 2021

and proposed residential receptors due to construction activities would be less than significant with mitigation for all residential receptors due to construction activities.

Based on SCAQMD methodology, the proposed Project construction emissions would represent a considerable contribution to a cumulative impact, resulting in a potentially significant and unavoidable cumulative impact.

#### 4.2.8.2 Operation

Modeling of daily criteria air pollutant emissions for the six operational scenarios includes consideration of VMT with and without the proposed Project. The 2027 and 2045 scenarios include the development of the related projects identified in **Section 4.0, 4.0.6: Cumulative Assumptions**. In addition, the Transportation Study (see **Appendix O**) the SCAG 2020-2045 RTP/SCS<sup>146</sup> Socio-economic data (SED) for base year (2016) and Future baseline (2045) constrained conditions were utilized as the basis for developing the socio-economic data for use with the Inglewood Travel Demand Forecast (TDF) model. Updates to the socioeconomic data include those associated with known related projects from various cities and adjacent jurisdictions. Opening year (2027) SED database was used for the Inglewood TDF developed using interpolation of the 2016 and 2045 databases from SCAG 2020-2045 RTP/SCS data updated for related projects. Therefore, the 2027 and 2045 scenarios account for the growth associated with related project and future growth as provided by SCAG.

With the proposed Project, emissions would result in decreases for all criteria pollutants (VOC, CO, NO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub> and SO<sub>2</sub>) compared to existing conditions, as well as the 2027 and 2045 scenarios without the proposed Project. Thus, operations would not have a significant cumulative regional air quality impact due to criteria pollutant emissions. In fact, emissions would be reduced from existing and future 2027 and 2045 No Project scenarios. As such, cumulative impacts from Project operations would be beneficial.

#### 4.2.9 CONSISTENCY WITH CITY GENERAL PLAN

As discussed previously under **Impact AQ-1**, the proposed Project would provide direct connections between the Metro K Line, and other transit providers as well as the City’s major activity centers, such as The Forum, the LASED and HPSP including SoFi stadium, and IBEC. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce per-capita VMT. For these reasons, the proposed Project would not conflict with Inglewood General Plan policies related to air quality.

<sup>146</sup> Southern California Association of Governments (SCAG), Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Draft, “Chapter 1,” <https://www.connectsocial.org/Pages/Connect-SoCal-Draft-Plan.aspx>. Accessed September 2021.

## 4.3 BIOLOGICAL RESOURCES

### 4.3.1 INTRODUCTION

This section of the Recirculated Draft Environmental Impact Report (Recirculated Draft EIR) evaluates the impacts of the proposed Inglewood Transit Connector Project (proposed Project) on nesting or migratory birds/raptors and trees afforded protection pursuant to Federal, State of California (State), and local statutes and regulations. The existing biological resource conditions in the area of the proposed Project are described, along with the methodology and the regulatory framework that guided the evaluation of biological resources. Potential impacts to biological resources that would result from the proposed Project are identified, along with any measures to mitigate significant effects of the proposed Project. The following information is incorporated into this section:

- *Preliminary Tree Survey of ATS Alignment*, Meridian Consultants LLC, June 11, 2018 (**Appendix H.1**);
- *Preliminary Tree Survey of Potential Support Facility Sites*, Meridian Consultants LLC, September 20, 2018 (**Appendix H.2**);
- *Preliminary and Supplemental Tree Inventory*, Pax Environmental, Incorporated, September 10, 2021 (**Appendix H.3**); and
- *CNDBR Survey*, Meridian Consultants LLC, September 10, 2021 (**Appendix H.4**)

The existing biological resources within the footprint of the proposed Project and immediate surrounding area have been evaluated based on existing published information and database research. The existing resources have been identified, along with the methodology and the regulatory framework that guided the evaluation thereof. Direct and/or indirect impacts to biological resources that would result from the demolition and clearing of existing vegetation, and construction and operation of the proposed Project were identified and evaluated as part of the Revised Initial Study prepared prior to the preparation of the December 2020 Draft EIR, and it was determined that the proposed Project would result in a “Less than Significant Impact.” Additionally, for three of these thresholds, the Initial Study found that the proposed Project would have “No Impact.”

The following impacts were determined to be less than significant:

- A substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS).
- A substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS.

- A substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

After circulation of the December 2020 Draft EIR for public review, the City revised the design of the proposed Project in response to consultation with key stakeholders in the community and comments received on the December 2020 Draft EIR. Specific changes to the proposed Project include raising the height of the ATS guideway along Market Street to preserve existing views of historic buildings, relocating the Prairie Avenue/Pincay Drive Station to the southwest corner of Prairie Avenue and Manchester Boulevard, redesign of the proposed MSF to allow this facility to be located on the proposed site with a new Vons store, and realignment of the guideway and stations on Prairie Avenue to the west side of Prairie Avenue. These changes include updated construction and operational details which resulted in similar impacts to biological resources compared to the December 2020 Draft EIR.

The changes to the design of the proposed Project do not create the potential for significant impacts related to the impacts above. The revised proposed Project would result in additional property acquisitions that would require demolition prior to construction of the proposed Project. Additionally, the revised proposed Project would include a Vons store replacement which would be developed prior to construction of the proposed Project. These changes would not affect the potential level of significance for the impacts discussed above.

Impacts found to be less than significant are further discussed in **Section 6.0: Other Environmental Considerations**.

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Recirculated Draft EIR.

### 4.3.2 METHODOLOGY

The methodology used to evaluate impacts to biological resources entails a review of the appropriate biological resources databases to determine which threatened or endangered plant or animal species have the potential to occur within the 7.5-minute quadrangles in which the proposed Project, including the guideway and stations, and support facility sites are located. The visual surveys were conducted to determine whether biological resources, including sensitive ecological areas, wetlands, wildlife migratory corridors, and/or habitat conservation areas, occur within 0.25 mile radius of the proposed guideway, stations, and other support facility sites to support these sensitive species. If the proposed Project could

potentially impact biological resources that exist within this area, there would be a potential for adverse impacts.

An intensive tree survey was completed to identify and categorize the existing street trees and landscaping that may be impacted (see **Appendix H.1**). This tree inventory covered the entire guideway alignment and locations of stations, including the public rights-of-way along the proposed Project with an approximately 50-foot buffer, as well as sites for potential support facilities. As the proposed Project has been refined, some of these potential locations have been eliminated from further consideration and were not analyzed in this section. Additionally, as the 50-foot buffer area included in the *Tree Inventory* provided a considerably conservative analysis for potential impacts of the proposed Project on biological resources, this section only addresses trees identified in the report that have been reasonably inferred to be within or near the footprint for the proposed guideway, stations, and support facilities.

The *Tree Inventory* collected information on all trees meeting the specifications for protected tree status as described by the City of Inglewood Tree Preservation Ordinance.<sup>1</sup> Data collection included a determination of species, geographic positioning system (GPS) coordinates, tree diameter at breast height (DBH) at 54.5 inches above the ground, and a description of tree health (poor, fair, or good as determined in the field). The information included in this tree inventory was reported in accordance with accepted scientific and technical standards that are consistent with the requirements of the USFWS and the CDFW. Based on the results of this inventory and the proposed improvements, loss of biological resources and their resulting impacts were identified. Construction of the guideway and stations would include equipment staging areas that may reach 22 feet from the guideway. As such, this analysis conservatively assumed that all existing trees within 25 feet of the proposed guideway and stations, and the MSF and PDS substation sites could be removed during construction. Additionally, potential measures to mitigate significant impacts have been identified for the proposed Project, as necessary.

### 4.3.3 REGULATORY FRAMEWORK

A review of the various federal, State, regional, and local government regulatory requirements was conducted to identify regulations that provide protections of biological resources. This section summarizes the various regulatory requirements that are relevant to the proposed Project.

<sup>1</sup> Inglewood Municipal Code Chapter 12, Article 32, Tree Preservation.

### 4.3.3.1 Federal Regulations

#### ***Federal Endangered Species Act***

The Federal Endangered Species Act<sup>2</sup> (FESA) of 1973, as amended, was promulgated to protect, and conserve any species of plant or animal that is endangered or threatened with extinction and the habitats in which these species are found.

Section 4(a) of the FESA<sup>3</sup> requires that critical habitat be designated by the USFWS “to the maximum extent prudent and determinable, at the time a species is determined to be endangered or threatened.” Critical habitat is formally designated by USFWS to provide guidance for planners/managers and biologists with an indication of where suitable habitat may occur and where high priority of preservation for a particular species should be given. “Take” of endangered species is prohibited under Section 9<sup>4</sup> of the FESA. Take, as defined under FESA, means to “harass, harm, pursue, hunt, wound, kill, trap, capture, collect, or attempt to engage in any such conduct.” Section 7 of the FESA requires federal agencies to consult with the USFWS on proposed federal actions that may affect any endangered, threatened or proposed (for listing) species or critical habitat that may support the species.

Section 10<sup>5</sup> of the FESA provides the regulatory mechanism that allows the incidental take of a listed species by private interests and nonfederal government agencies during lawful activities. Habitat conservation plans (HCPs) for the impacted species must be developed in support of incidental take permits for nonfederal projects to minimize impacts to the species and develop viable mitigation measures to offset the unavoidable impacts.

#### ***Migratory Bird Treaty Act***

The Migratory Bird Treaty Act<sup>6</sup> (MBTA) of 1918 is the domestic law that affirms or implements the United States’ commitment to four international conventions with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, and prohibits the take, possession, import, export, transport, sale, purchase, barter, or offering of these activities, except under a valid permit or as permitted in the implementing regulations.

<sup>2</sup> United State Code (USC), Title 16, Sections 1531-1544, Endangered Species Act.

<sup>3</sup> USC Title 16, Section 1533. [ESA Section 4] Determination of endangered species and threatened species.

<sup>4</sup> USC Title 16, Section 1538. [ESA Section 9] Prohibited acts.

<sup>5</sup> USC Title 16, Section 1539. [ESA Section 10] Exceptions.

<sup>6</sup> U.S. Fish and Wildlife Service (USFWS), Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712; Ch. 128; July 3, 1918; 40 Stat. 755) as amended by: Chapter 634; June 20, 1936; 49 Stat. 1556; P.L. 86-732; September 8, 1960; 74 Stat. 866; P.L. 90-578; October 17, 1968; 82 Stat. 1118; P.L. 91-135; December 5, 1969; 83 Stat. 282; P.L. 93-300; June 1, 1974; 88 Stat. 190; P.L. 95-616; November 8, 1978; 92 Stat. 3111; P.L. 99-645; November 10, 1986; 100 Stat. 3590 and P.L. 105-312; October 30, 1998; 112 Stat. 2956

As with the FESA, the MBTA also authorizes the Secretary of the Interior to issue permits for take. The procedures for securing such permits are found in Title 50 of the Code of Federal Regulations, together with a list of the migratory birds covered by the act. This law is generally protective of migratory birds but does not specify the type of protection required. USFWS administers permits to take migratory birds in accordance with the regulations promulgated by the MBTA. Nesting raptors, such as red-tailed hawks and burrowing owls, are protected under the MBTA. In common practice, USFWS places restrictions on disturbances allowed near active raptor nests.

#### 4.3.3.2 State Regulations

##### **California Endangered Species Act (CESA)**

In addition to federal laws, the State implements the California Endangered Species Act,<sup>7</sup> (CESA) which is enforced by CDFW. The CESA program maintains a separate listing of species beyond the FESA, although the provisions of each act are similar.

State-listed threatened and endangered species are protected under provisions of the CESA. Activities that may result in “take” of individuals (defined in CESA as; “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”) are regulated by CDFW. Habitat degradation or modification is not included in the definition of “take” under CESA. Nonetheless, CDFW has interpreted “take” to include the destruction of nesting, denning, or foraging habitat necessary to maintain a viable breeding population of protected species.

The State of California considers an endangered species as one whose prospects of survival and reproduction are in immediate jeopardy. A threatened species is considered as one present in such small numbers throughout its range that it is likely to become an endangered species in the near future in the absence of special protection or management. A rare species is one that is considered present in such small numbers throughout its range that it may become endangered if its present environment worsens. State threatened and endangered species are fully protected against take, as defined above.

The CDFW has also produced a species of special concern list to serve as a species watch list. Species on this list are either of limited distribution or their habitats have been reduced substantially, such that a threat to their populations may be imminent. Species of special concern may receive special attention during environmental review, but they do not have formal statutory protection. At the federal level, USFWS also uses the label species of concern, as an informal term that refers to species which might be in need of concentrated conservation actions. As the Species of Concern designated by USFWS do not

<sup>7</sup> California, Fish and Game Code, Section 2050 et. seq. California Endangered Species Act.

receive formal legal protection, the use of the term does not necessarily ensure that the species will be proposed for listing as a threatened or endangered species.

##### **California Native Plant Protection Act**

The California Naïve Plant protection Act<sup>8</sup> (NPPA) was enacted in 1977 and allows the Fish and Game Commission to designate plants as rare or endangered. There are 64 species, subspecies, and varieties of plants that are protected as rare under the NPPA. The NPPA prohibits take of endangered or rare native plants, but includes some exceptions for agricultural and nursery operations; emergencies; and after properly notifying CDFW for vegetation removal from canals, roads, and other sites, changes in land use, and in certain other situations (see Fish and Game Code section 1900 et seq. for more information).

##### **California Fish and Game Code**

###### **Section 3500-3516 – Birds**

California Fish and Game Code Sections 3503, 3503.5, 3511, and 3513<sup>9</sup> are applicable to natural resource management. Section 3503 of the Code makes it unlawful to destroy any birds’ nest or any birds’ eggs that are protected under the MBTA. Further, any birds in the orders Falconiformes or Strigiformes (Birds of Prey, such as hawks, eagles, and owls) are protected under Section 3503.5 of the Fish and Game Code which makes it unlawful to take, possess, or destroy their nest or eggs.

A consultation with CDFW may be required prior to the removal of any bird of prey nest that may occur on a project site. Section 3511 of the Fish and Game Code lists fully protected bird species, where the CDFW is unable to authorize the issuance of permits or licenses to take these species. Pertinent species that are State fully protected by the State include golden eagle (*Aquila chrysaetos*) and white-tailed kite (*Elanus leucurus*).

Section 3513 of the Fish and Game Code makes it unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

<sup>8</sup> California Department of Fish and Wildlife, Native Plant Protection Act (NPPA), accessed September 2021, <https://www.wildlife.ca.gov/Conservation/Plants/Laws>.

<sup>9</sup> California Department of Fish and Wildlife, Fish and Game Code (FGC), Division 4. Birds and Mammals, [3000 - 4904] (Division 4 enacted by Stats. 1957, Ch. 456), Part 2. Birds [3500 - 3864] ( Part 2 enacted by Stats. 1957, Ch. 456)

### California Fish and Game Code Sections 1900–1913 – Rare and Endangered Plants

California Fish and Game Code Sections 1900–1913<sup>10</sup> were developed to preserve, protect, and enhance Rare and Endangered plants in the State. The act requires all State agencies to use their authority to carry out programs to conserve Endangered and Rare native plants. Provisions of the Native Plant Protection Act prohibit the taking of listed plants from the wild and require notification of the CDFW at least ten days in advance of any change in land use which would adversely impact listed plants. This allows the CDFW to salvage listed plant species that would otherwise be destroyed.

### California Native Plant Society Rare and Endangered Plant Species

The California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants is a widely-recognized resource that directly guides rare plant protection, conservation planning, and land acquisition and management in California. CNPS published the first edition of its Inventory of Rare and Endangered Plants in 1974, with the Inventory currently in its 8th edition.<sup>11</sup>

The CNPS Inventory of Rare and Endangered Plants ranks plants and threats as follows:

#### California Rare Plant Rank

- 1A – Plants Presumed Extirpated in California and either Rare or Extinct Elsewhere
- 1B – Plants Rare, Threatened, or Endangered in California and Elsewhere
- 2A – Plants Presumed Extirpated in California, But More Common Elsewhere
- 2B – Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere
- 3 – Plants about Which More Information is Needed - A Review List
- 4 – Plants of Limited Distribution - A Watch List

#### Threat Ranks

- .1 – Seriously threatened in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)
- .2 – Moderately threatened in California (20-80 percent occurrences threatened/moderate degree and immediacy of threat)
- .3 – Not very threatened in California (less than 20 percent of occurrences threatened/low degree and

<sup>10</sup> California Fish and Game Code, Fish and Game Code (FGC), Division 2, Department of Fish and Wildlife, (700-1940), Chapter 10, Sections 1900-1913, Native Plant protection.

<sup>11</sup> California Native Plant Society (CNPS), Inventory of Rare and Endangered Plants (V. 6) 2001, Note - the Inventory switched to being online (V. 7, developed and maintained by Larry Levine), and is currently in its 8th edition. <https://www.cnps.org/rare-plants/cnps-inventory-of-rare-plants>, accessed September 2021.

### California Environmental Quality Act

Section 15380 of the CEQA Guidelines<sup>12</sup> independently defines “endangered” and “rare” species separately from the definitions of the CESA.<sup>13</sup> Under CEQA, “endangered” species of plants or animals are defined as those whose survival and reproduction in the wild are in immediate jeopardy, while “rare” species are defined as those who are in such low numbers that they could become endangered if their environment worsens.

#### Special-Status Species

Special-status species are those animal and plant species that, in the judgment of the resource agencies, trustee agencies, and certain nongovernmental organizations, warrant special consideration in the CEQA process. This includes the following:

- Officially designated “threatened,” “endangered,” or “candidate” species federally listed by the USFWS and protected under the Federal Endangered Species Act.
- Officially designated “rare,” “threatened,” “endangered,” or “candidate” species listed by the CDFW and protected under the California Endangered Species Act. CDFW also maintains a list of “Fully Protected” species as well as “California Species of Special Concern” that are also generally treated as special-status species under CEQA.
- Species considered rare, threatened, or endangered under the conditions of Section 15380 of the CEQA Guidelines, such as plant species identified on lists 1A, 1B, and 2 in the CNPS Inventory of Rare and Endangered Vascular Plants of California, which may include species not found on either State or federal endangered species list.
- Other species considered sensitive, such as birds protected under the MBTA, which includes most native birds. A species may also be designated as special concern at the local level.

#### 4.3.3.3 Local Plans and Regulations

##### General Plan

##### Conservation Element

The Conservation Element of the City’s General Plan was adopted in October 1997 and addresses the conservation, development, and use of natural resource including water, soils, lakes, and mineral deposits.<sup>14</sup> The Conservation Element notes that resources which are typically addressed in conservation

<sup>12</sup> California Code of Regulations, Title 14, Division 6, Chapter 3, Article 20, § 15380.

<sup>13</sup> California, Fish and Game Code, Section 2050 et. seq. California Endangered Species Act.

<sup>14</sup> City of Inglewood *General Plan*, “Conservation Element” (1997).

elements, including biological resources such as forests, wildlife, fisheries, shorelines, and agricultural land, are not found in Inglewood.

#### Land Use Element

The Land Use Element of the City's General Plan describes tree masses as an important component of the physical environment of the City.<sup>15</sup> The Land Use Element states that trees are not merely aesthetic elements of the urban setting, but also provide beneficial effects such as noise attenuation, amelioration of air pollution and dust, and temperature control. As such, landowners are encouraged to plant trees to realize these benefits. The following policy from the Land Use Element is applicable to the proposed Project:

**Policy 3.2: Green Boulevards**

Create Green Boulevards that protect cyclists, infiltrate stormwater and use vegetation to create a sense of place on Florence Avenue, La Brea Avenue, Manchester Boulevard and Prairie Avenue.

#### ***New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines***

The New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines<sup>16</sup> (Downtown TOD Plan) provides guidelines and standards for design, including landscaping, within the Downtown Inglewood and Fairview Heights neighborhoods of the City and works to implement the City's vision for transforming the quality of the environment within these areas. The Downtown TOD Plan area consists of approximately 585 acres located in the center of Inglewood along the Metro K Line just east of the Florence Avenue/La Brea Avenue intersection. This Downtown planning and zoning area extends approximately one-half mile in all directions from the Metro K Line Downtown Inglewood station. The Fairview Heights TOD Plan area consists of approximately 328 acres located near the intersection of Florence Avenue and West Boulevard. This Fairview Heights planning and zoning area also extends approximately one-half mile in all directions from the Metro Station.

The Downtown TOD Plan includes concept plans, zoning, development standards and design guidelines, and an implementation action plan for consideration by applicants submitting any proposals for new construction or rehabilitation within the Plan area, as well as for consultation by City Staff when making recommendations for project approvals. The Downtown TOD Plan addresses architectural detail, signage, public art, and civic and cultural life. Further, the Downtown TOD Plan includes street tree concepts,

<sup>15</sup> City of Inglewood *General Plan*, "Land Use Element" (adopted 1980, amended 1986, 2009, and 2016).

<sup>16</sup> City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*.

including recommended street tree locations and species along roadways within the Downtown and Fairview Heights neighborhoods.

Section 2.8: Street Trees and Furniture<sup>17</sup> of the Downtown TOD Plan establishes that street trees are important elements of streetscapes and placemaking and provides guidelines on the character of trees placed within key areas of Downtown Inglewood. The Downtown TOD Plan recommends that Manchester Boulevard be lined with London Plane (*Platanus x acerifolia*) trees, or a similar species. This tree's ability to withstand air pollution, drought, as well as most diseases makes it a desirable street tree that would also provide some uniformity and connectivity for Downtown Inglewood. In the case of Florence Avenue, the Downtown TOD Plan calls for London Plane trees alternated with the California fan palm (*Washingtonia filifera*). Market Street should retain its existing street trees. The smaller arterial streets near Market Street may alternate between the Brisbane box (*Lophostemon confertus*), an evergreen tree, and the ginkgo (*Ginkgo biloba*), a deciduous tree. The Downtown TOD Plan states that these smaller street trees bring down the scale of the streets and create a sense of place throughout the streets of Downtown Inglewood.

#### ***Hollywood Park Specific Plan***

The Hollywood Park Specific Plan (HPSP)<sup>18</sup> establishes development standards and design guidelines for the 238-acre Hollywood Park site at the northeast corner of the Prairie Avenue and Century Boulevard intersection and provides an overview of existing infrastructure and necessary improvements related to the Hollywood Park site, including measures for implementation measures of the HPSP. Portions of the area within the HPSP site have either been developed (SoFi Stadium) or are under development.

The HPSP provides guidelines and standards for improvements in the public right-of-way within the Specific Plan area, which includes approximately 0.5 miles of street frontage along Prairie Avenue. The HPSP includes streetscape standards and provides integrated and coordinated landscape design guidelines for new development along the perimeter of the HPSP area to integrate it with the adjoining urban fabric, achieve a diverse urban forest, and assist in developing districts of distinctive and appropriate character.<sup>19</sup> Sidewalk widths are intended to provide walking routes and parkway widths are designed to provide sufficient area for urban tree growth. The HPSP guidelines and standard for streetscape include identity elements that will differentiate Hollywood Park from nearby developments through architectural features, landscaping (such as seasonal displays of color), graphic elements (such as

<sup>17</sup> City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, , Section 2.8: Street Trees and Furniture, p. 19.

<sup>18</sup> City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015.

<sup>19</sup> City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Section 3.2.2, Streetscape, p. 3-28.

signs or logos), special passenger or automobile paving, special night lighting effects, or other similar features.

The HPSP, Section 3.2.2: Streetscape, identifies selected street trees and the desired locations for their placement on internal roadways within the HPSP area as well as along major adjacent roadways, including Prairie Avenue, Century Boulevard, and the intersection corner of those roadways.<sup>20</sup> A majority of the tree species listed in the HPSP were selected from the City of Inglewood's approved tree list.<sup>21</sup> Selections were based upon recommendations from local arborists to create a palette of horticulturally successful, low maintenance, and climate-appropriate tree species. Alternative selections can be proposed, subject to City approval.

The HPSP states that street trees along Prairie Avenue shall be substantial and continuous to achieve an appropriate scale for the street.<sup>22</sup> Along the portion of Prairie Avenue north of Hardy Street, large columnar evergreen trees such as Afghan pine (*Pinus eldarica*) or Canary Island pine (*Pinus canariensis*) will provide continuity with the retail development to the east and the cemetery to the north. This arrangement is intended to visually reduce the scale of the street and provide ample shade as visitors approach the HPSP site. Both Prairie Avenue south of Hardy Street and the northern side of Century Boulevard will be similarly lined with large evergreen trees such as camphor trees (*Cinnamomum camphora*) or Southern magnolia (*Magnolia grandiflora*). In addition, large canopy flowering trees and palms will mark key points near the HPSP site, including the retail corner and major entries, and maintain adequate street visibility. Selected species include Date palm (*Phoenix dactylifera*), Chanticleer Callery pear (*Pyrus calleryana*), and pink trumpet tree (*Tabebuia impetiginosa*). Palm trees at the northeastern corner of Prairie Avenue and Century Boulevard are intended to provide a thematic connection to Century Boulevard near the Los Angeles International Airport (LAX).

### City of Inglewood Municipal Code

The City of Inglewood Municipal Code (IMC), Tree Preservation.<sup>23</sup> recognizes the importance of both native and nonnative trees within the City for the many benefits they provide. Properly maintained trees increase property values, maintain the natural ecology, temper the effects of extreme temperatures, reduce runoff, prevent erosion of topsoil, and help create and maintain the identity and visual character of the City.

<sup>20</sup> City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Section 3.2.2, Streetscape, Exhibit 3-25—Landscape Street Sections Map, p. 3-28.

<sup>21</sup> City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Section 3.2.2, Streetscape, Exhibit 3-25—Landscape Street Sections Map, p. 3-28.

<sup>22</sup> City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Section 3.2.2, Streetscape, p. 3-29.

<sup>23</sup> Inglewood, California, Municipal Code, Article 32, Section 12-110 (2012), Tree Preservation.

Prior to removing or cutting a protected tree in the City, a permit must be obtained with the City's Parks, Recreation, and Library Services Department. Protected trees are specified by IMC include:<sup>24</sup>

- (A) Trees having a minimum trunk diameter of eight inches measured fifty-four inches above the ground. When measuring a multitrunk tree, the diameters of the largest three trunks shall be added together.
- (B) Street trees or other required trees such as those required as a condition of approval, Use Permit, or other zoning requirement, regardless of size.
- (C) All memorial trees dedicated by an entity recognized by the City, and all specimen trees that define a neighborhood or community.
- (D) Trees of the following species that have reached a minimum of four inches diameter trunk size:
  - Big Leaf Maple (*Acer macrophyllum*)
  - California Buckeye (*Aesculus californica*)
  - Madrone Arbutus (*menziesii*)
  - Western Dogwood (*Cornus nuttallii*)
  - California Sycamore (*Platanus racemose*)
  - Coast Live Oak (*Quercus agrifolia*)
  - Canyon Live Oak (*Quercus chrysolepis*)
  - Blue Oak (*Quercus douglassii*)
  - Oregon White Oak (*Quercus garryana*)
  - California Black Oak (*Quercus kelloggii*)
  - Valley Oak (*Quercus lobata*)
  - Interior Live Oak (*Quercus wislizenii*)
  - California Bay (*Umbellularia californica*)

- (E) A tree or trees of any size planted as a replacement for a protected tree.

Pursuant to the provisions of City Ordinance 12-06 5-8-12,<sup>25</sup> no person shall remove, destroy, perform cutting of branches over one inch in diameter, or disfigure or cause to be removed, destroyed, or disfigured any protected tree without having first obtained a permit to do so. Moreover, an application for a Protected tree Removal or Cutting Permit shall be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee Schedule.<sup>26</sup> All protected trees shall require a permit for removal, relocation, cutting or reshaping. All removed or disfigured trees shall also require replacement with like-size, like-kind trees or an equal value tree or trees as determined by the Parks, Recreation and Library Services Department.<sup>27</sup> If a replacement tree is unavailable in like size or kind, the value of the original protected tree shall be determined using the latest edition of *Guide for Plant*

<sup>24</sup> Inglewood, California, Municipal Code, Section 12-113, Protected Trees.

<sup>25</sup> Inglewood, California, Municipal Code, Chapter 12, Article 32, Section 12-117 (2012).

<sup>26</sup> City of Inglewood, "Master Fee Schedule," September 2016.

<sup>27</sup> Inglewood, California, Municipal Code, Chapter 12, Article 32, Section 12-117 (2012).

*Appraisal* by the International Society of Arboriculture.<sup>28</sup> The valuation is used to determine the number and size of replacement trees required. The replacement trees must be located on site wherever possible.<sup>29</sup> Where there is not sufficient room on site for the replacement trees in the judgment of the City's Parks, Recreation and Library Services Department, another site may be designated that is mutually agreeable.<sup>30</sup>

### **Inglewood and Lennox Greening Plan**

The Social Justice Learning Institute and TreePeople joined forces in 2009 to improve the environmental and health conditions in the City of Inglewood and the adjacent unincorporated community of Lennox in developing the Inglewood and Lennox Greening Plan (Greening Plan).<sup>31</sup> The Greening Plan was completed via a grant provided by the State Strategic Growth Council Urban Greening and Sustainable Communities Planning Grant Program, under the authority of the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006 (Proposition 84).<sup>32</sup>

The Greening Plan is meant to serve as a master document to guide and coordinate greening efforts within Inglewood and Lennox. Priority actions include increasing tree canopy cover, building community gardens and implementing practices to capture and conserve rainwater on select sites identified in the Plan. Strategies have also been developed that will increase opportunities for active living and enhanced community health. In the Greening Plan, the term "greening" encompasses a comprehensive suite of objectives, activities, and strategies outlined throughout the plan.

### **4.3.4 EXISTING CONDITIONS**

The proposed Project is located in the central and northern portions of the City of Inglewood, east of the San Diego Freeway (I-405) and north of the Glen Anderson Freeway (I-105) in Los Angeles County, California. The proposed Project would begin along Market Street near the Metro K Line and proceed south through downtown Inglewood, east on Manchester Boulevard, and south on Prairie Avenue until its intersection with Hardy Street.

As shown in **Section 3.0: Project Description, Figure 3.0-3: Project Vicinity Map**, the proposed Project would be located along the public rights-of-way within the City and upon several developed properties adjacent to the proposed Project which would accommodate the guideway, stations, and support facilities. The alignment of the guideway and locations of stations, and support facility sites (MSF and PDS

<sup>28</sup> International Society of Arboriculture, *Guide for Plan Appraisal, 10th Edition*, 2018.

<sup>29</sup> Inglewood, California, Municipal Code, Chapter 12, Article 23, Section 12-116 (2012).

<sup>30</sup> Inglewood, California, Municipal Code, Chapter 12, Article 23, Section 12-116 (2012).

<sup>31</sup> TreePeople, *Inglewood and Lennox Greening Plan*, December 2016.

<sup>32</sup> California Code of Regulations, Division 43. The Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006.

substations) consist of developed or disturbed areas adjacent to active roadways. Disturbed land are areas that have been previously disturbed by grading, vehicle use, and/or vegetation clearing and maintenance while urban/developed land are areas that consist of buildings, roadways, and other built infrastructure.

### **4.3.4.1 Database Review**

#### **California Natural Diversity Database**

The California Natural Diversity Database (CNDDDB)<sup>33</sup> is an inventory of the status and locations of rare plants and animals in California maintained by CDFW. CNDDDB staff collaborate with partners to maintain current lists of rare species, as well as to maintain an ever-growing database of GIS-mapped locations for these species.

As part of the environmental review for the Initial Study of the proposed Project completed in 2018, a review of the CNDDDB found that the only plant species consist of ornamental landscaping and street trees as well as weeds and ruderal vegetation. A subsequent review of the CNDDDB<sup>34</sup> was completed in September 2021 for the nine quadrangles (the Inglewood Quadrangle in which the prospect is located and the surrounding eight quadrangles including Beverly Hills, Hollywood, Los Angeles, Venice, South Gate, Redondo Beach, Torrance, and Long Beach) that encompass the proposed Project.<sup>35</sup> The review indicated that 193 species were identified for the nine quadrangles; this includes 29 species located within the Inglewood quadrant. Of these, five species were previously identified within approximately one mile of the proposed Project. These consisted of two wildlife species, crotch bumble bee (*Bombus crotchii*) and pocketed free-tailed bat (*Nyctinomops femorosaccus*), and three plant species, southern tarplant (*Centromadia parryi ssp. australis*), spreading navarretia (*Navarretia fossalis*), and prostrate vernal pool navarretia (*Navarretia prostrata*). Spreading navarretia and prostrate vernal pool navarretia are presumed extirpated from the area. The other species are presumed extant, but only occur in specific habitats that are not located within the footprint of the proposed Project.<sup>36</sup>

The CNDDDB does not list any recently recorded observations of sensitive plant or animal species or sensitive habitats protected by State or federal law. However, it should be noted that a lack of records in CNDDDB should not be construed to mean that no rare plants or animals occur in a given area.

<sup>33</sup> California Department of Fish and Wildlife (CDFW), California Natural Diversity Database, accessed September 2021, <https://www.wildlife.ca.gov/Data/CNDDDB>.

<sup>34</sup> CDFW, California Natural Diversity Database, "Maps and Data," accessed September 2021, <https://www.wildlife.ca.gov/Data/CNDDDB>.

<sup>35</sup> See **Appendix H.4: CNDDDB Survey** to this Recirculated Draft EIR.

<sup>36</sup> CDFW, California Natural Diversity Database, "Maps and Data," accessed September 2021, <https://www.wildlife.ca.gov/Data/CNDDDB>.

### eBird Database

The eBird<sup>37</sup> is the world's largest biodiversity-related citizen science project, with more than 100 million bird sightings contributed each year by eBirders around the world. eBirders are a collaborative enterprise with hundreds of partner organizations, thousands of regional experts, and hundreds of thousands of users, and is managed by the Cornell Lab of Ornithology.

A review of the eBird database was completed in September 2021.<sup>38</sup> Common bird species noted in the eBird database historically observed within the area near the proposed Project include Brewer's Blackbird (*Euphagus cyanocephalus*), Black-bellied Plover (*Pluvialis squatarola*), Tricolored Blackbird (*Agelaius tricolor*), Canada Goose (*Branta canadensis*), Northern Rough-winged Swallow (*Stelgidopteryx serripennis*), American Coot (*Fulica americana*), Western Bluebird (*Sialia mexicana*), Lincoln's Sparrow (*Melospiza lincolni*), Brown-headed Cowbird (*Molothrus ater*), Cliff Swallow (*Petrochelidon pyrrhonota*), Bushtit (*Psaltriparus minimus*), white-crowned sparrow (*Zonotrichia leucophrys*), house finch (*Carpodacus mexicanus*), and the common house sparrow (*Passer domesticus*).<sup>39</sup> None of these species are sensitive or protected by State or federal law with the exception of the Tricolored Blackbird (*Agelaius tricolor*) which is listed as a threatened species under CESA.<sup>40</sup>

While the proposed Project does not include native habitat areas that are used for wildlife movement or migration corridors, various roadways and proposed support facility sites include and are lined with street trees and other landscaping that could harbor native birds or raptors and their nests.

#### 4.3.4.2 Biological Setting

This section identifies areas within 0.25-mile radius of either side of the proposed Project guideway, stations, and support facility sites for the MSF and PDS substations that may be considered to have biological resources. The proposed Project is located within a highly developed and urbanized area and potential biological resources are limited to a few small parks. These parks are primarily landscaped areas and wildlife species utilizing the parks are mostly those adapted to living in an urban environment.

Sensitive animal and plant species and vegetation communities identified by the CNDDDB as having the potential to occur within 0.25-mile radius of either side of the proposed Project's guideway, stations, and support facility sites are largely absent. Due to their mobility, some sensitive bird species may utilize

37 Cornell Lab of Ornithology, *eBird*, accessed September 2021, <https://ebird.org/about>.

38 Cornell Lab of Ornithology, *eBird*, "Hotspot Map," accessed September 2021, <https://ebird.org/home>.

39 Cornell Lab of Ornithology, *eBird*, "Hotspot Map," accessed September 2021, <https://ebird.org/home>.

40 California Endangered Species Act (CESA), Listing of Species Under the California Endangered Species Act, <https://fgc.ca.gov/CESA#tcbb2015>, accessed September 2021.

existing mature trees during migration but would not be supported as residents within this urbanized setting.

With the exception of the small pond located within the Inglewood Park Cemetery, there are no wetland areas within 0.25-mile radius of either side of the guideway, stations, support facility sites. Vegetation around this pond is nonnative, landscaped vegetation, but waterfowl were observed utilizing the small amount of open water there. No wildlife corridors exist within this area to support movement of wildlife species other than birds.

There are no Habitat Conservation Plans (HCPs) for this area. Further, there are no Significant Ecological Areas (SEAs) as designated by Los Angeles County Department of Regional Planning located within 0.25-mile radius of either side of the guideway, stations, support facility sites.<sup>41</sup>

Visual surveys were conducted in May 2018. The surveys consisted of visual observation and photographic documentation of all parks and open space areas along the guideway, stations, and support facility sites. During the surveys, mature trees existing in roadway medians directly within the footprint of the proposed Project were also observed.

#### 4.3.4.3 Trees and Landscaping

The Tree Inventory was conducted by Pax Environmental on November 15, 16, 18, 19, and December 6, 2018, and an additional survey was conducted in August 2021 based on the changes to the alignment boundary. The Tree inventory covers the entire footprint of the proposed Project, including the public rights-of-way along the length of the guideway, locations of stations and the support facilities (MSF and PDS substation sites) with an approximately 50-foot buffer. This inventory involved an intensive effort to identify and categorize the existing street trees and landscaping within the proposed Project and identified trees determined to qualify as protected according to the provisions of the City's Tree Preservation Ordinance. The 50-foot buffer area included in the Tree Inventory (refer to **Appendix H.3**) provided a conservative analysis potential impacts to biological resources. See **Figure 4.3-1: Potential Tree Impacts – Market Street/Florence Avenue Station(a)** through **Figure 4.3-18: Potential Tree Impacts – Prairie Avenue(f)** (see end of this section) which shows the existing tree locations along the guideway and within the acquisition sites. A breakdown of these trees by Project component is provided below.

#### Guideway

The proposed Automated Transit System (ATS) guideway would be approximately 1.6-miles long and would have a minimum clearance height of approximately 16 feet 6 inches above all roadways. The

41 Los Angeles County Department of Regional Planning, Significant Ecological Areas Program, GIS Web Application, accessed September 2021, [http://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET\\_Public.GIS-NET\\_Public](http://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public).

elevated guideway will be primarily located within the public rights-of-way for the streets and sidewalk areas along Market Street, Manchester Boulevard, and Prairie Avenue with some encroachments on private property located adjacent to the public right of way for stations and vertical circulation features, such as stairways and escalators. All protected trees identified along the guideway consist of nonnative tree species which are commonly used in ornamental landscaping. Protected tree species within these areas predominantly consist of Mexican fan palm, little-leaved fig, narrow-leaved eucalyptus, Jacaranda, Canary Island pine, and Queen palm. See below for more detail.

**Market Street**

Figure 4.3-2 through Figure 4.3-5 identify the existing trees along Market Street from Florence Avenue to Manchester Boulevard. **Table 4.3-1: Summary of Protected Trees Along Market Street** summarizes the types of trees located along and within the vicinity of the Market Street segment.

**Table 4.3-1  
Summary of Protected Trees Along Market Street**

Common Name	Scientific Name	Quantity
Jacaranda	<i>Jacaranda mimosifolia</i>	10
Little-leaved Fig	<i>Ficus microcarpa</i>	13
Mexican fan palm	<i>Washingtonia robusta</i>	2
Narrow-leaved eucalyptus	<i>Magnolia grandiflora</i>	20
<b>Total</b>		<b>45</b>

Source: Tree Inventory, Pax Environmental, Inc., September 10, 2021. Included as Appendix H.3 of this Recirculated Draft EIR.  
 \* Unidentified tree species not included in the Tree Inventory but may qualify as protected.

As shown in Table 4.3-1, a total of 45 protected trees were identified for the Market Street segment. All 45 trees are located within the Downtown TOD Plan and qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.<sup>42</sup>

**Manchester Boulevard**

Figure 4.3-5 through Figure 4.3-7, and Figure 4.3-9 through Figure 4.3-12 identify the existing trees along Manchester Boulevard from Market Street to Prairie Avenue. **Table 4.3-2: Summary of Protected Trees Along Manchester Boulevard** summarizes the types of trees located along and within the vicinity of the Manchester Boulevard segment.

42 City of Inglewood, IMC Section 12-113, Protected Trees.

**Table 4.3-2  
Summary of Protected Trees Along Manchester Boulevard**

Common Name	Scientific Name	Quantity
Callery pear	<i>Pyrus calleryana</i>	3
Carrotwood	<i>Cupaniopsis anacardioides</i>	2
Fern pine	<i>Podocarpus gracilior</i>	2
Italian stone pine	<i>Pinus pinea</i>	1
Jacaranda	<i>Jacaranda mimosifolia</i>	1
Leyland Cypress	<i>Cupressus leylandii</i>	20
Liquidambar	<i>Liquidambar styraciflua</i>	1
Little-leaved Fig	<i>Ficus microcarpa</i>	7
Mexican fan palm	<i>Washingtonia robusta</i>	101
Queen palm	<i>Syagrus romanzoffiana</i>	6
Tulip Tree	<i>Liriodendron tulipifera</i>	5
Water Gum	<i>Tristaniopsis laurina</i>	2
Western Sycamore	<i>Platanus racemosa</i>	1
<b>Total</b>		<b>152</b>

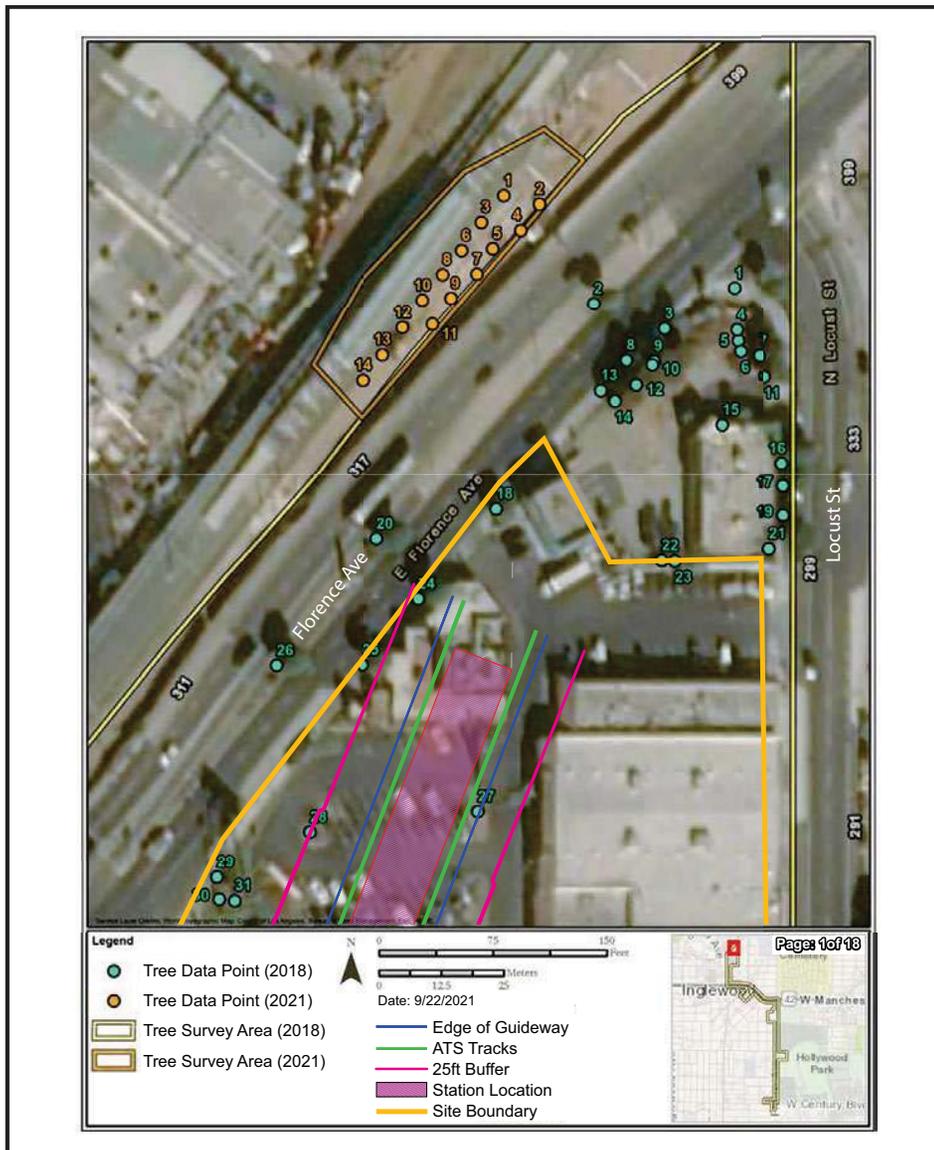
Source: Tree Inventory, Pax Environmental, Inc., September 10, 2021. Included as Appendix H.3 of this Recirculated Draft EIR.  
 \* Unidentified tree species not included in the Tree Inventory but may qualify as protected.

As shown in Table 4.3-2, a total of 152 protected trees were identified for the Manchester Boulevard segment. All 152 trees are located within the Downtown TOD Plan and qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.<sup>43</sup>

**Prairie Avenue**

Figure 4.3-12 through Figure 4.3-18 identify the existing trees along Prairie Avenue from Manchester Boulevard to Hardy Street. **Table 4.3-3: Summary of Protected Trees Along Prairie Avenue** summarizes the types of trees located along and within the vicinity of the Prairie Avenue segment.

43 City of Inglewood, IMC Section 12-113, Protected Trees.

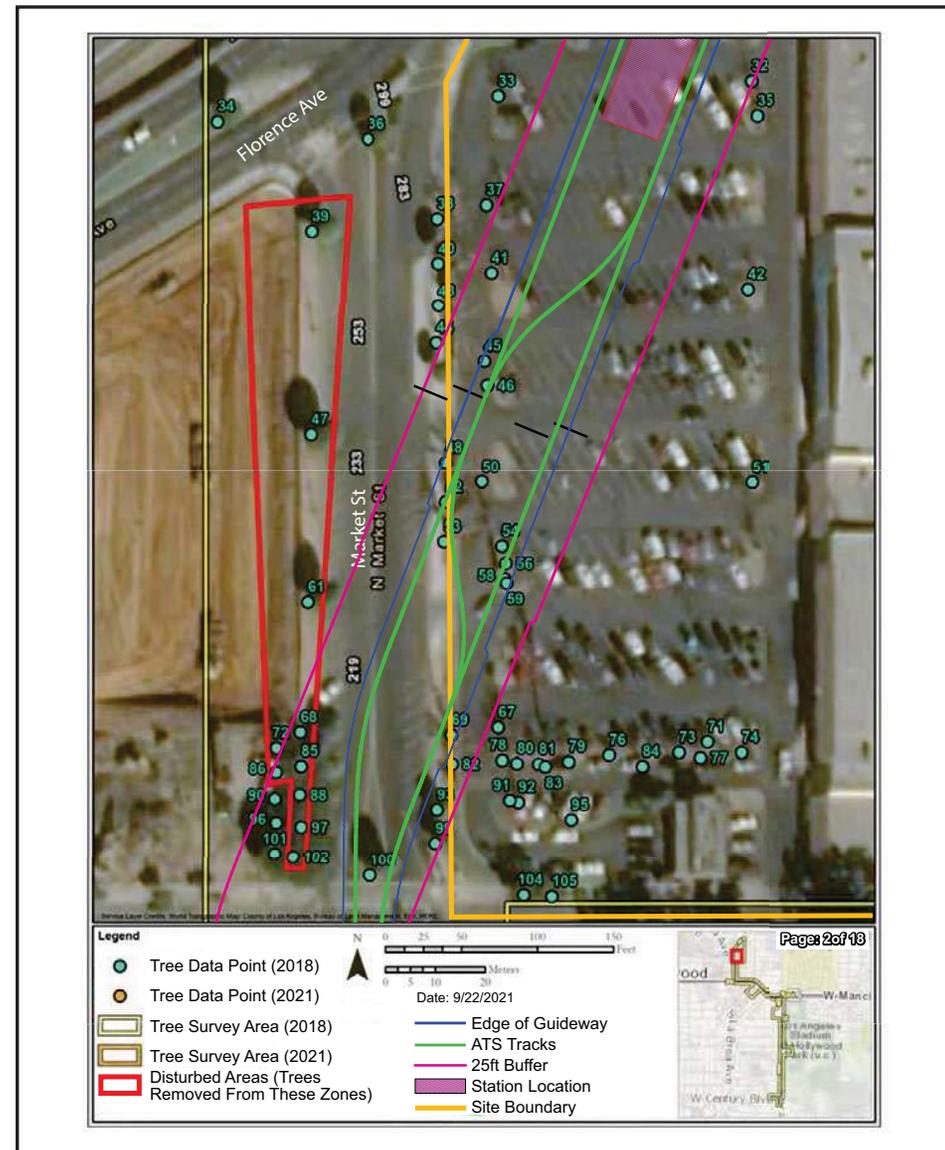


SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE 4.3-1

Potential Tree Impacts – Market Street/Florence Avenue Station(a)

251-003-20



SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE 4.3-2

Potential Tree Impacts – Market Street/Florence Avenue Station(b)

251-003-20



SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE 4.3-3

Potential Tree Impacts – Market Street/Florence Avenue Station(c)

251-003-20

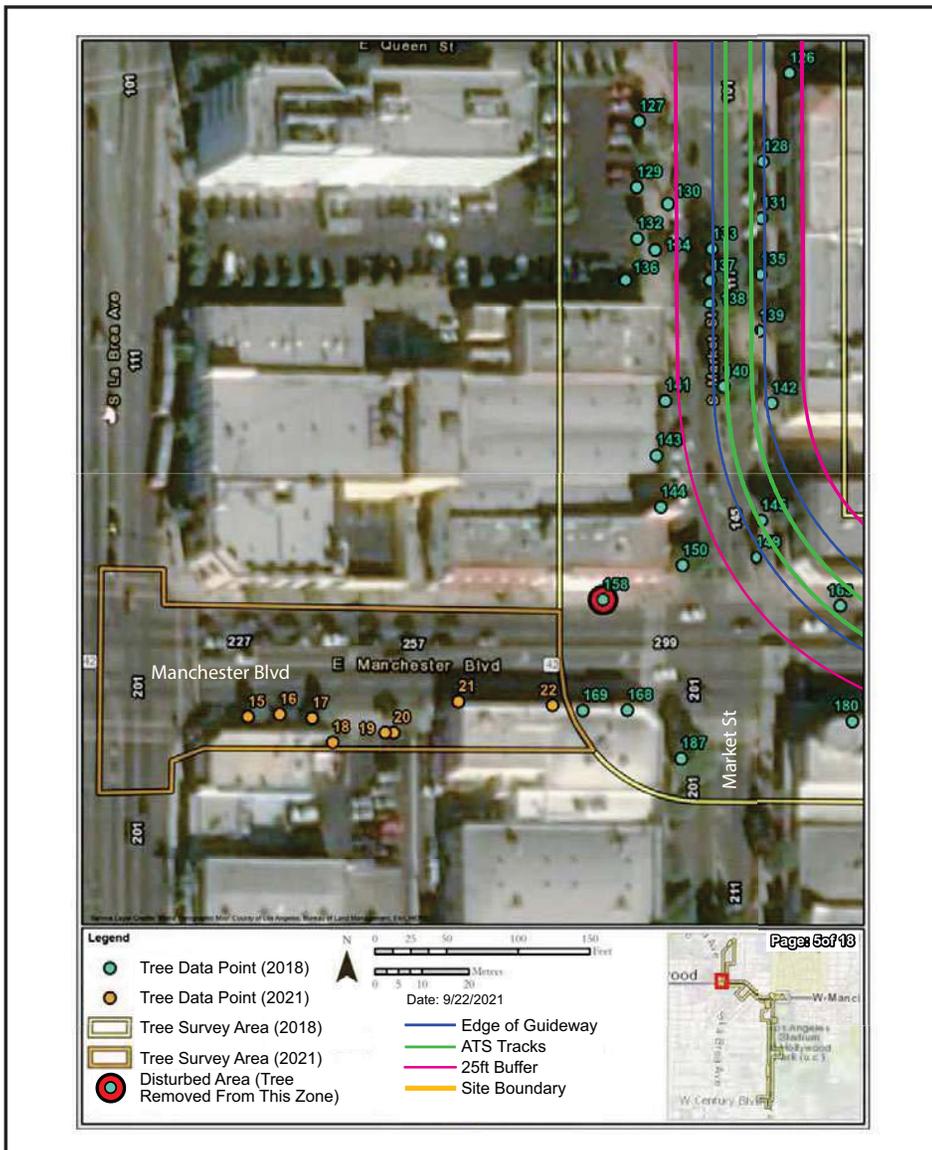


SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE 4.3-4

Potential Tree Impacts – Market Street

251-003-20

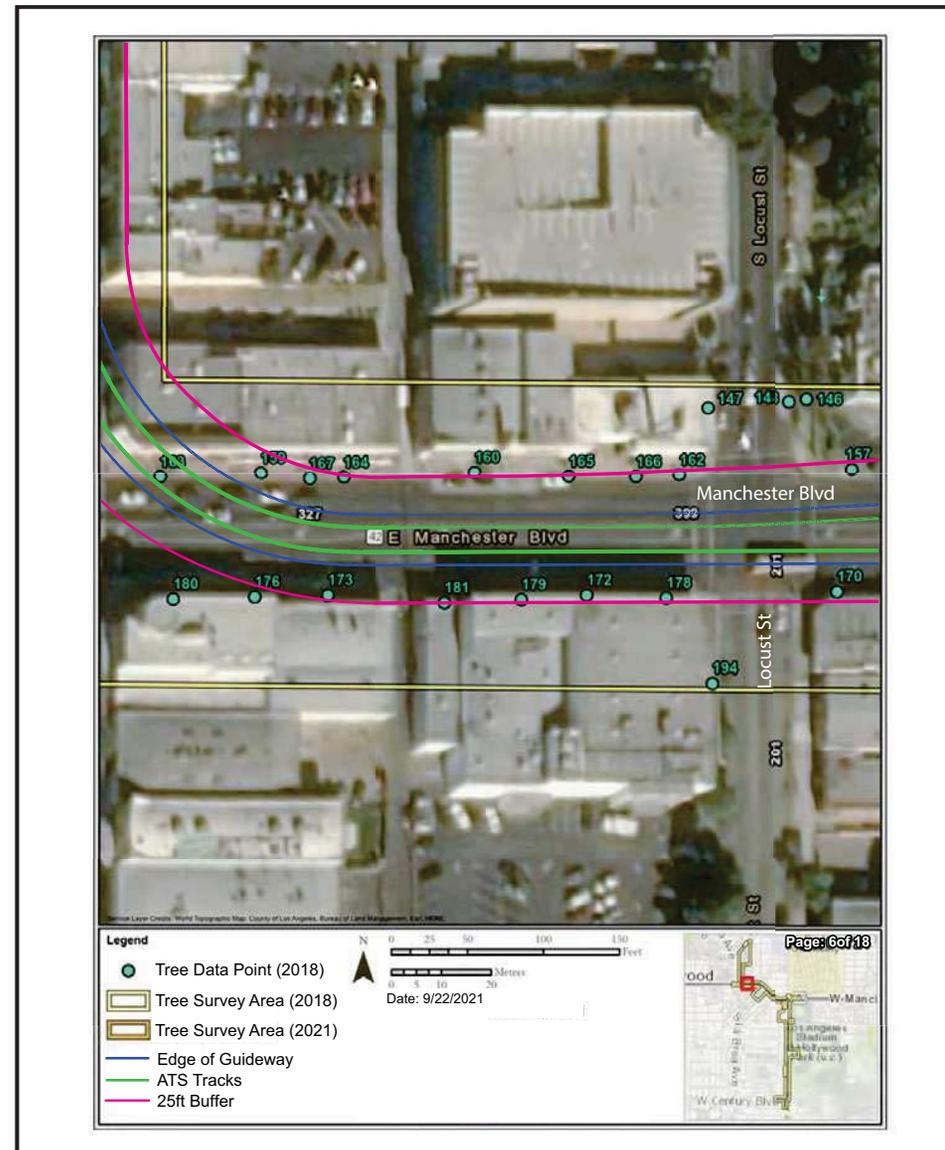


SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE 4.3-5

Potential Tree Impacts – Market Street/Manchester Boulevard

251-003-20



SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE 4.3-6

Potential Tree Impacts – Manchester Boulevard(a)

251-003-20



SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE 4.3-7

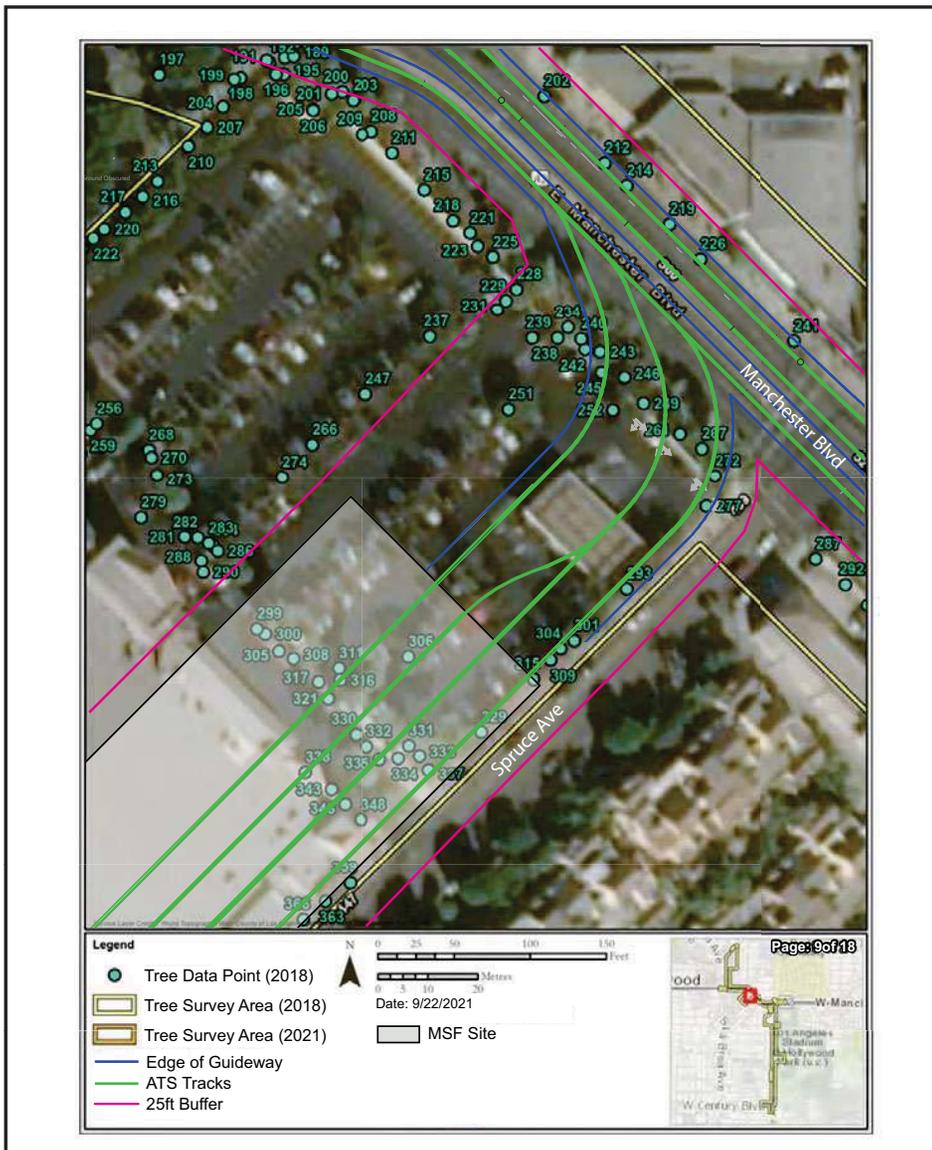
Potential Tree Impacts – Manchester Boulevard/MSF Site(a)



SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE 4.3-8

Potential Tree Impacts – MSF Site



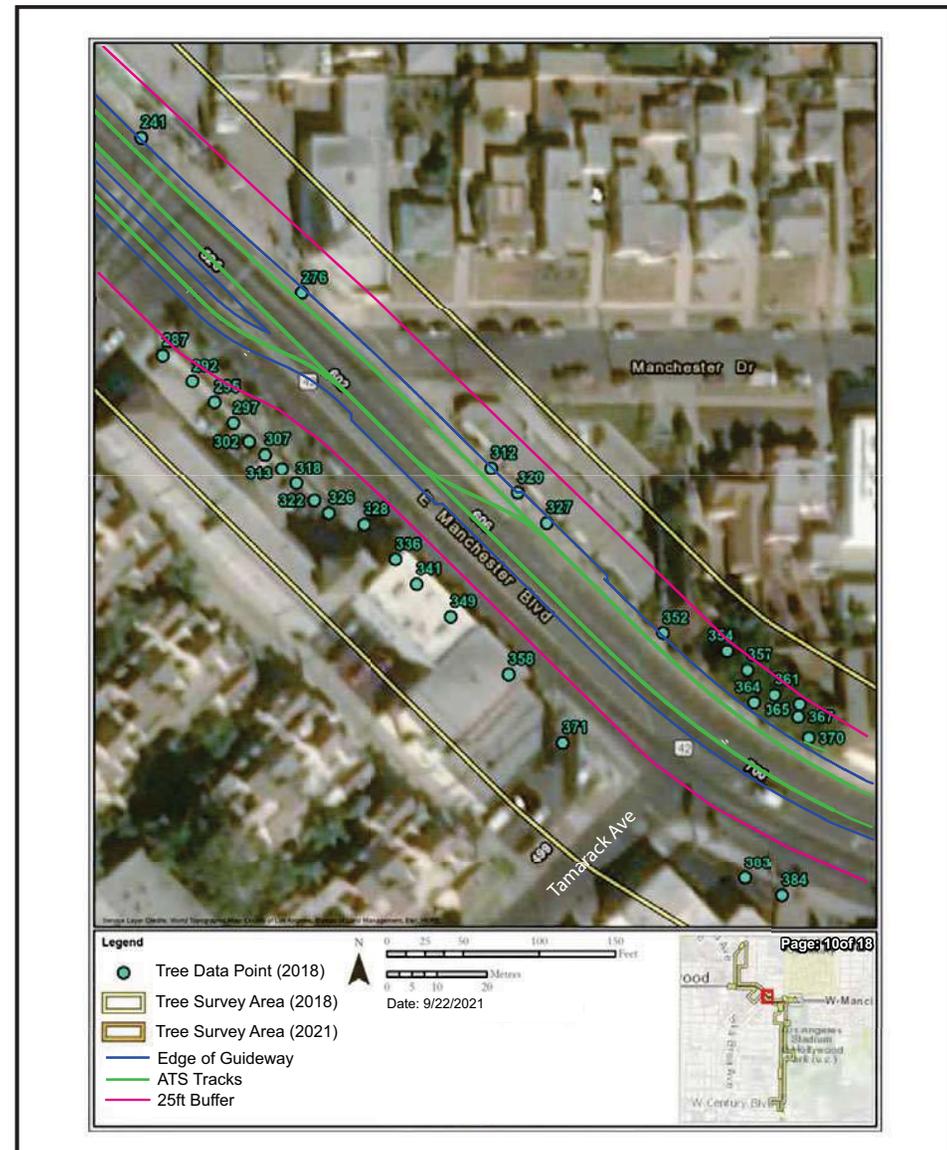
SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE 4.3-9



Potential Tree Impacts – Manchester Boulevard/MSF Site(b)

251-003-20



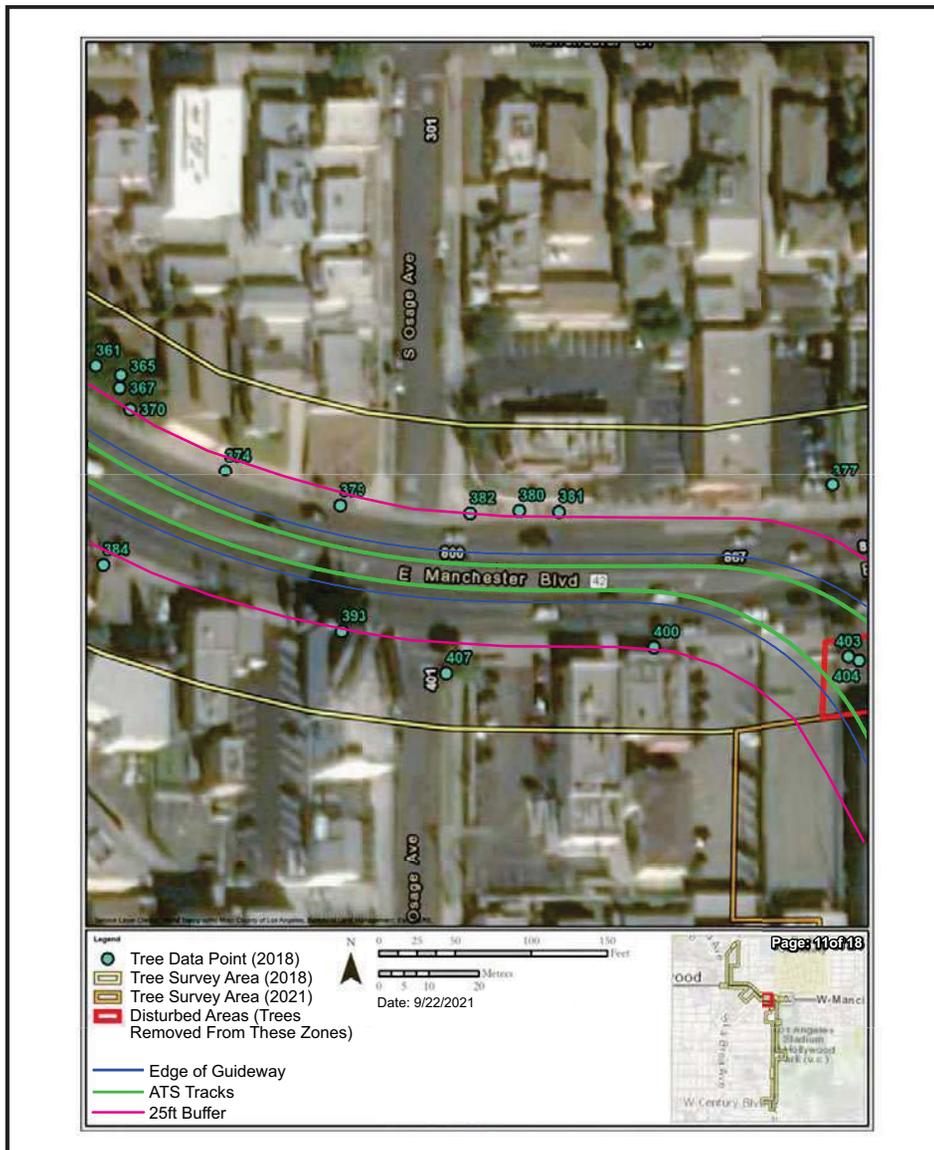
SOURCE: Pax Environmental, Inc. – September 2018; Meridian Consultants - 2021

FIGURE 4.3-10



Potential Tree Impacts – Manchester Boulevard(b)

251-003-20



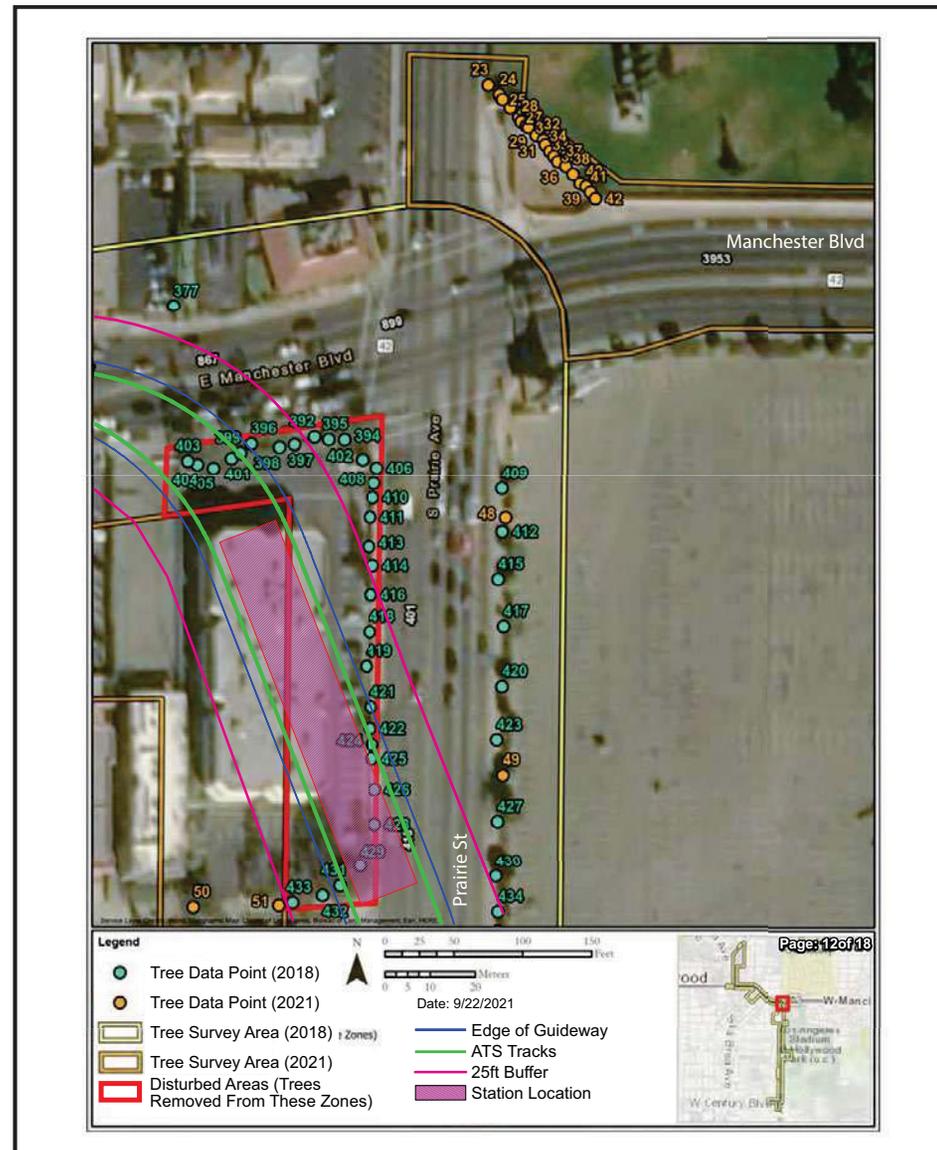
SOURCE: Pax Environmental, Inc. – September 2021 Meridian Consultants - 2021

FIGURE 4.3-11

Potential Tree Impacts – Manchester Boulevard(c)



251-003-20



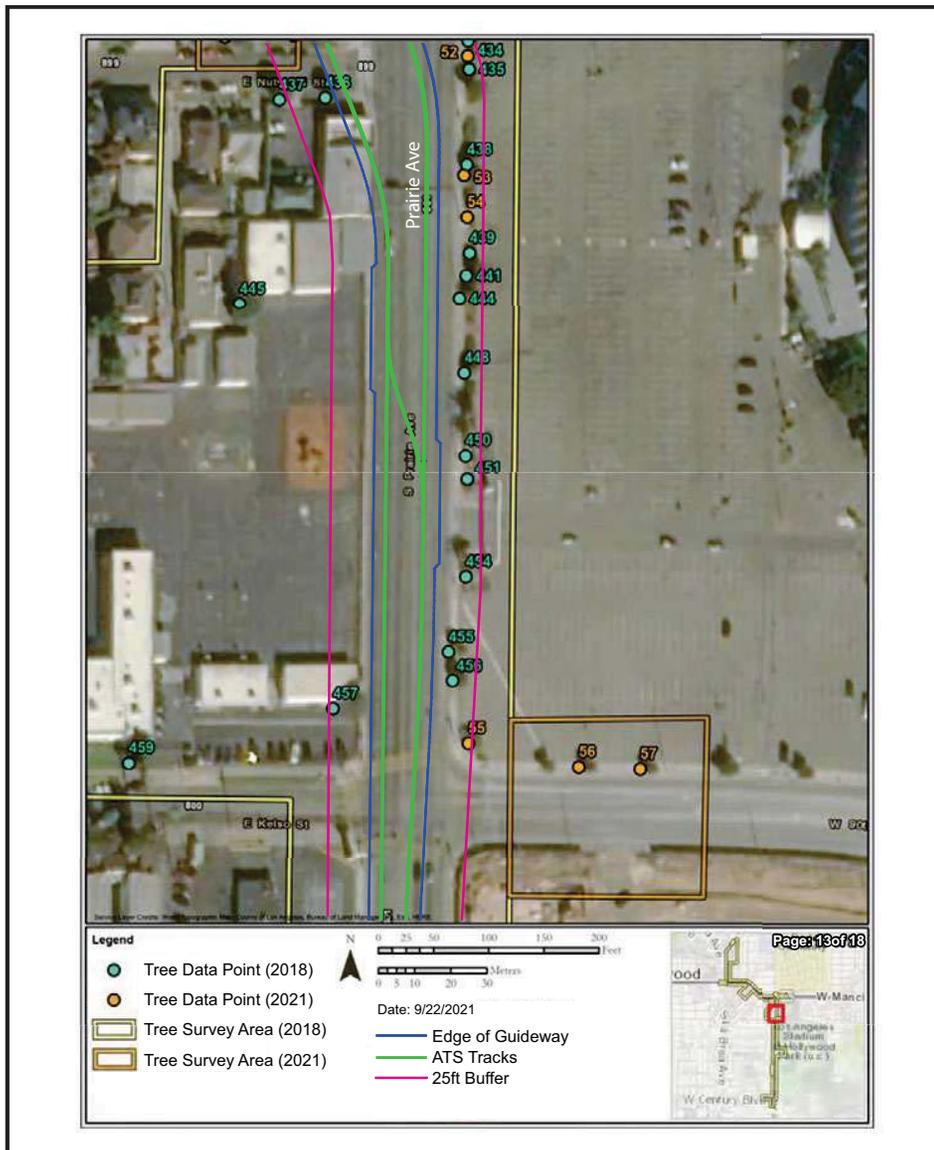
SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE 4.3-12

Potential Tree Impacts – Manchester Boulevard/Prairie Avenue



251-003-20

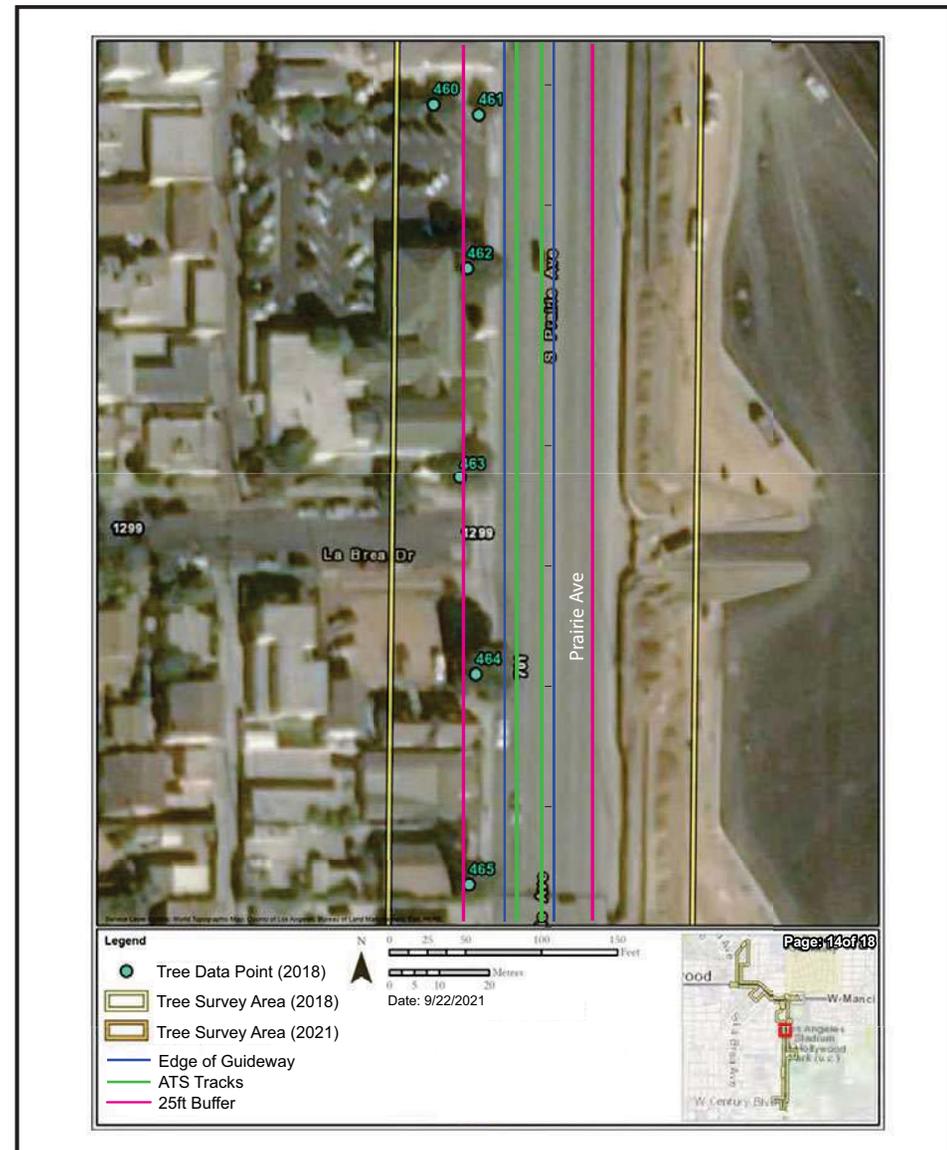


SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE 4.3-13

Potential Tree Impacts – Prairie Avenue(a)

251-003-20

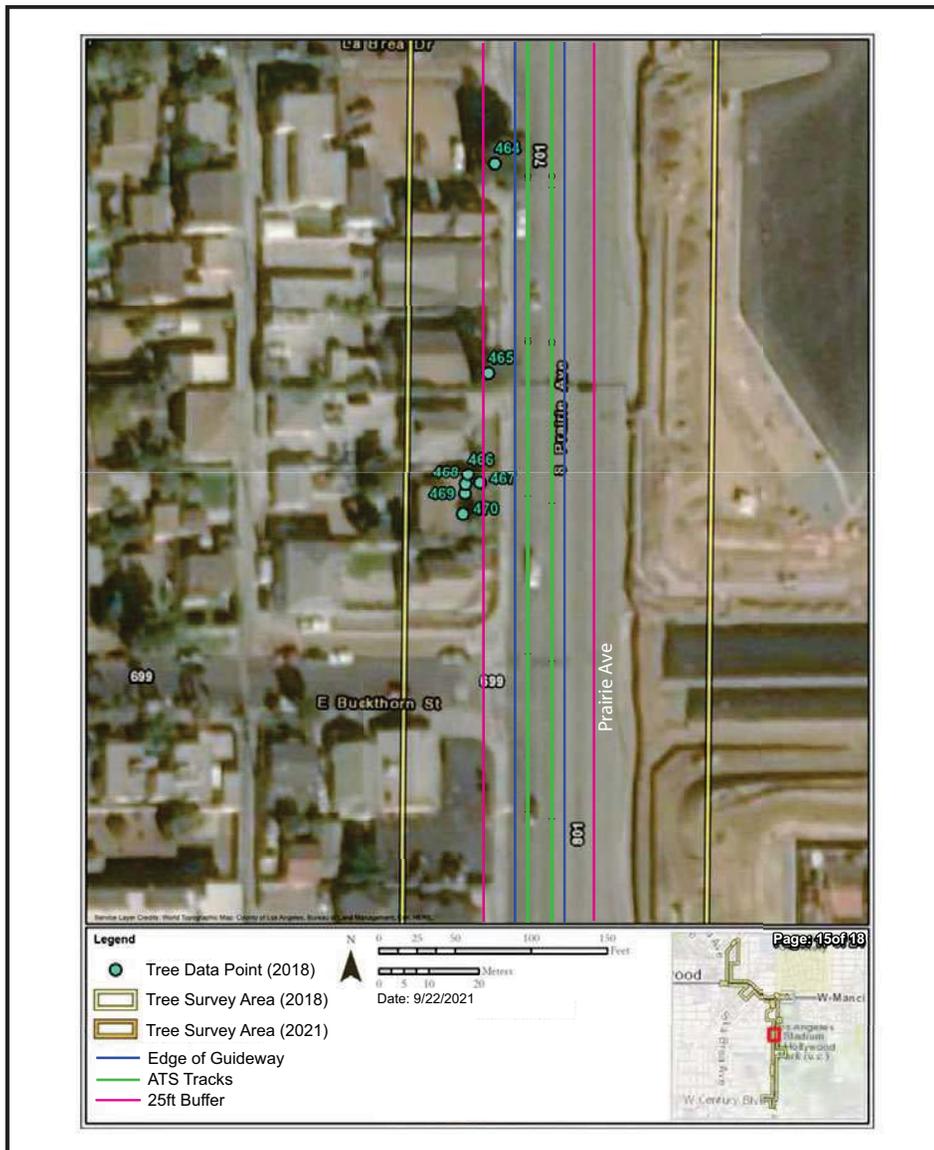


SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE 4.3-14

Potential Tree Impacts – Prairie Avenue(b)

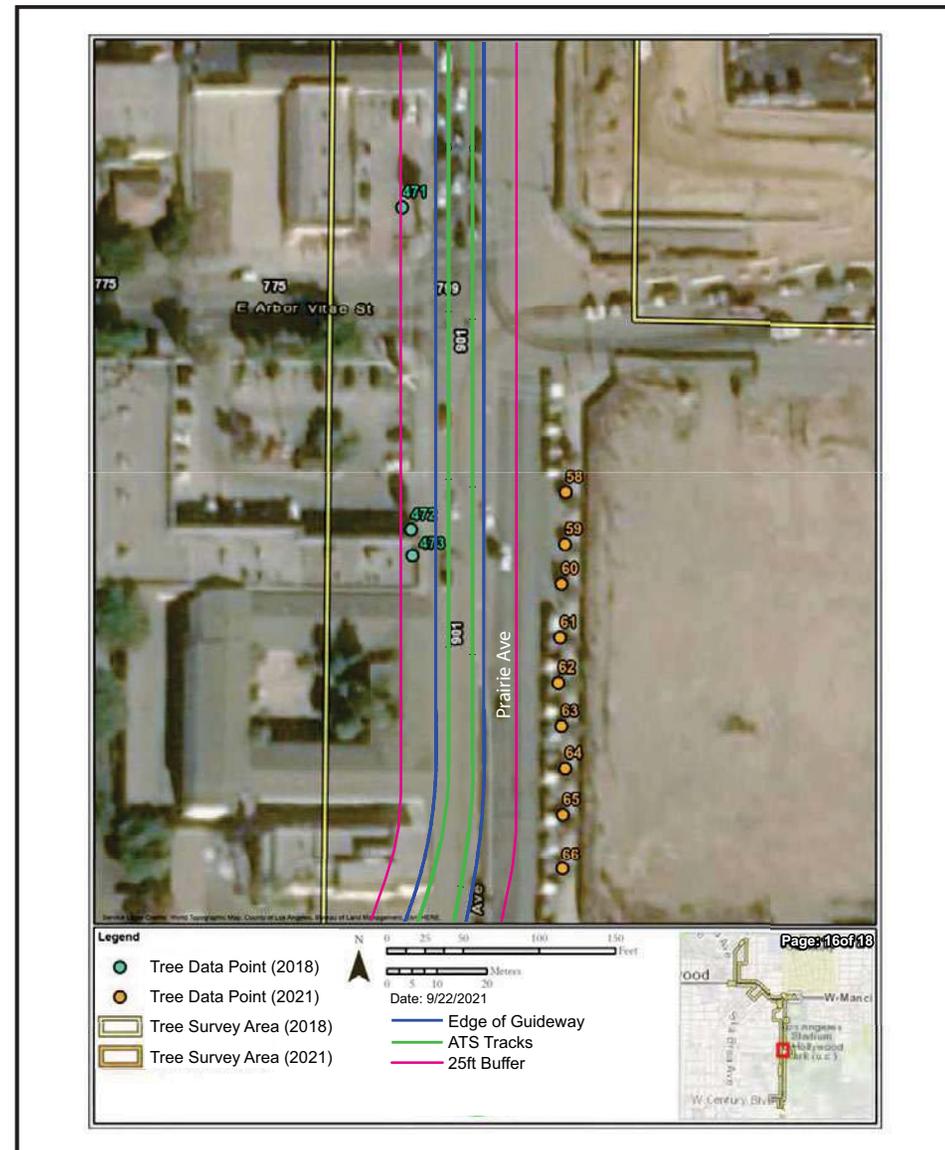
251-003-20



SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE 4.3-15

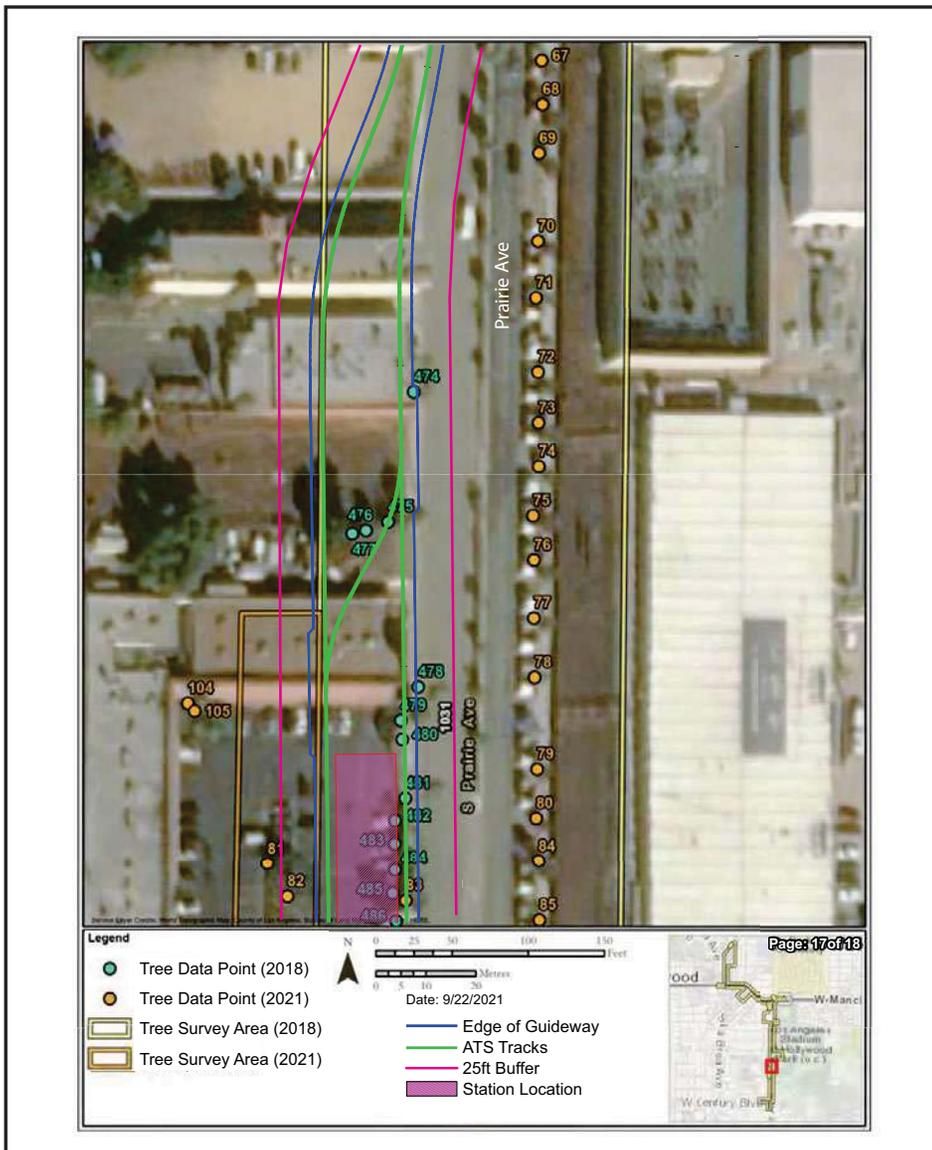
Potential Tree Impacts – Prairie Avenue(c)



SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE 4.3-16

Potential Tree Impacts – Prairie Avenue(d)



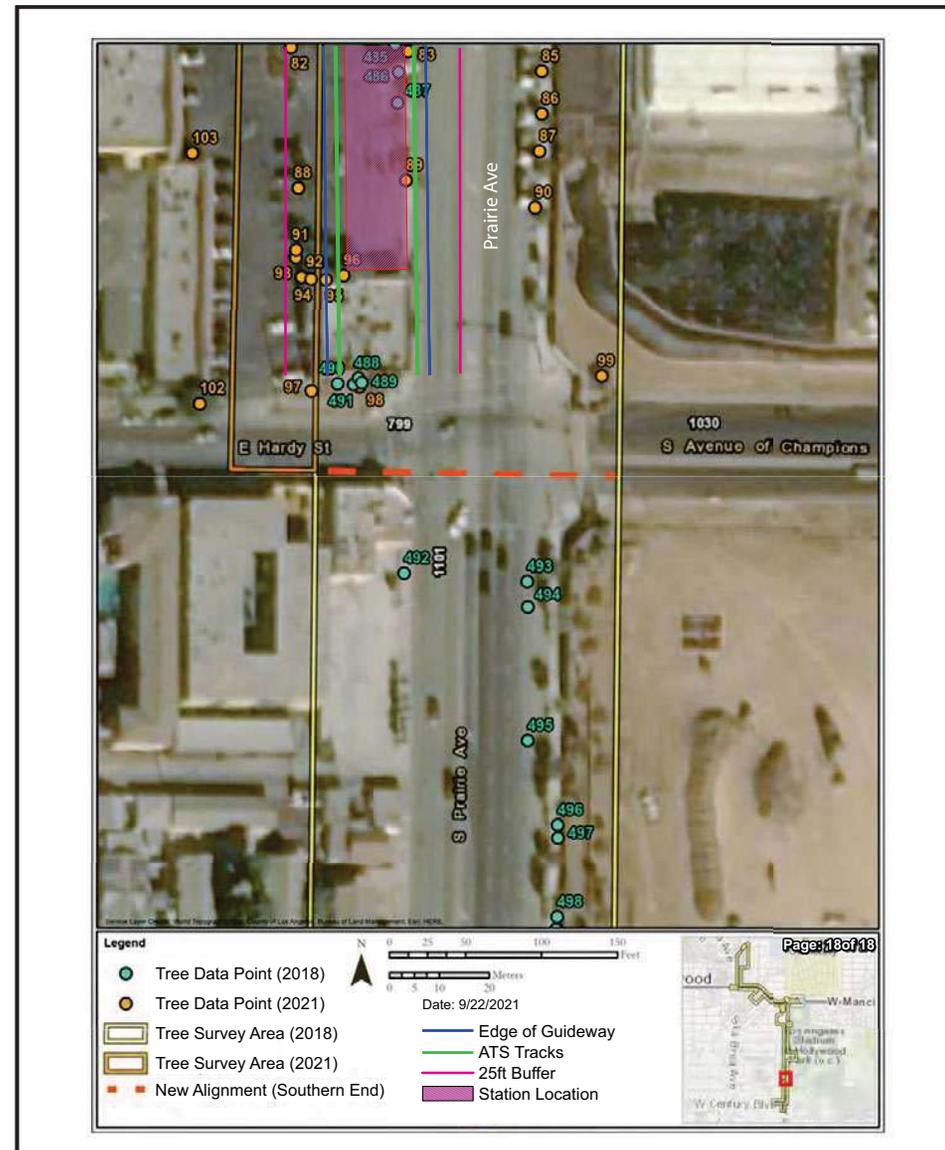
SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE 4.3-17

Potential Tree Impacts – Prairie Avenue(e)



251-003-20



SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE 4.3-18

Potential Tree Impacts – Prairie Avenue(f)



251-003-20

**Table 4.3-3**  
**Summary of Protected Trees Along Prairie Avenue**

Common Name	Scientific Name	Quantity
Callery Pear	<i>Pyrus calleryana</i>	2
Carrotwood	<i>Cupaniopsis anacardioides</i>	4
Chinese elm	<i>Ulmus parvifolia</i>	3
Crape-Myrtle	<i>Lagerstroemia speciosa</i>	2
Evergreen ash	<i>Fraxinus uhdei</i>	1
Fern pine	<i>Podocarpus gracilior</i>	2
Giant yucca	<i>Yucca gigantea</i>	2
Liquidambar	<i>Liquidambar styraciflua</i>	1
Little-leaved Fig	<i>Ficus microcarpa</i>	12
Magnolia	<i>Magnolia grandiflora</i>	2
Mexican Ash	<i>Fraxinus berlandieriana</i>	18
Mexican fan palm	<i>Washingtonia robusta</i>	10
Naked Coral Tree	<i>Erythemacoralodendron</i>	1
Queen palm	<i>Syagrus romanzoffiana</i>	13
Red Gum	<i>Eucalyptus camaldulensis</i>	1
<b>Total</b>		<b>74</b>

Source: Tree Inventory, Pax Environmental, Inc., September 10, 2021. Included as Appendix H.3 of this Recirculated Draft EIR.

As shown in **Table 4.3-3**, a total of 74 protected trees were identified along Prairie Avenue. These trees are not located within a City plan but remain within the jurisdiction of the IMC and qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.<sup>44</sup>

The guideway and stations would be developed within areas included in the Downtown TOD Plan and adjacent to the western portion of the HPSP area. The remainder of the guideway would be subject to the requirements of the IMC. While the Downtown TOD Plan and HPSP contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, they do contain unique provisions and recommendations for the location of tree placement and types of tree species to be used.

<sup>44</sup> City of Inglewood, IMC Section 12-113, Protected Trees.

### Stations and MSF

The proposed Project would require a number of full and/or partial property and air rights acquisitions and easements or leases for construction and continued operation of the guideway, stations, MSF, and other support facilities.

### Market Street/Florence Avenue Station

The Market Street/Florence Avenue station site is located along a portion of Market Street and Florence Avenue generally located between Market Street and Locust Street.

**Figure 4.3-1** through **Figure 4.3-3** identify the existing trees associated the Market Street/Florence Avenue station site. **Table 4.3-4: Summary of Protected Trees Within the Market Street/Florence Avenue Station Site** summarizes the types of trees associated with the Market Street/Florence Avenue station site.

**Table 4.3-4**  
**Summary of Protected Trees Within Market Street/Florence Avenue Station Site**

Common Name	Scientific Name	Quantity
Brazilian pepper	<i>Schinus terebinthifolius</i>	23
California fan palm	<i>Washingtonia filifera</i>	2
Callery pear	<i>pyrus taiwanensis</i>	2
Canary Island pine	<i>Pinus canariensis</i>	2
Coral tree	<i>Erythrina caffra</i>	10
Date Palm	<i>Phoenix dactylifera</i>	14
European hackberry	<i>Celtis australis</i>	1
Little-leaved Fig	<i>Ficus microcarpa</i>	17
Mexican fan palm	<i>Washingtonia robusta</i>	7
<b>Total</b>		<b>78</b>

Source: Tree Inventory, Pax Environmental, Inc., September 10, 2021. Included as Appendix H.3 of this Recirculated Draft EIR.

As shown in **Table 4.3-4**, a total of 78 protected trees are associated with the Market Street/Florence Avenue station site. Of these, 58 are located within the site and are considered private property. The remaining 20 trees are public street trees located throughout the perimeter of the site along Florence Avenue, Locust Street, and Regent Street. All protected trees identified within this area and adjoining parcels consist of nonnative, ornamental tree species which are commonly used in ornamental landscaping. Protected tree species within this site predominantly consist of Little-leaved Fig, Brazilian

pepper, and Coral tree. As no protected tree *species* were identified, the 78 trees identified as protected qualified as such by meeting the minimum trunk diameter size requirements of the IMC Section 12-113.<sup>45</sup> This site would be developed within an area included in the Downtown TOD Plan. While the Downtown TOD Plan does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it does contain unique provisions and recommendations for the location of tree placement and types of tree species to be used.

#### Prairie Avenue/Manchester Boulevard Station

The Prairie Avenue/Manchester Boulevard station site is proposed on the southwest corner of the Prairie Avenue and Manchester Boulevard intersection.

Figure 4.3-12 identifies the existing trees associated the Prairie Avenue/Manchester Boulevard station site. However, as indicated in Figure 4.3-12, the trees identified within the Prairie Avenue/Manchester Boulevard station site have been removed since the 2018 *Tree Inventory* was conducted. The supplemental 2021 *Tree Inventory* identified two additional trees located adjacent to the site along Nutwood Street. These trees are identified at Mexican Ash (*Ulmus parvifolia*) and qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.<sup>46</sup>

#### Prairie Avenue/Hardy Street Station

The Prairie Avenue/Hardy Street station site is located west of Prairie Avenue on the northwest corner of the Prairie Avenue and Hardy Street intersection.

Figure 4.3-17 and Figure 4.3-18 identify the existing trees associated with the Prairie Avenue/Hardy Street station site. Table 4.3-5: Summary of Protected Trees Within the Prairie Avenue/Hardy Street Station Site summarizes the types of trees associated with the Prairie Avenue/Hardy Street station site. As shown in Table 4.3-7, a total of 32 protected trees are associated with the Prairie Avenue/Hardy Street station site. All 32 trees located within the site are considered private property. All protected trees identified within this area and adjoining parcels consist of nonnative, ornamental tree species which are commonly used in ornamental landscaping.<sup>47</sup> These trees are not located within a City plan but remain within the jurisdiction of the IMC and qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.<sup>48</sup>

<sup>45</sup> City of Inglewood, IMC Section 12-113, Protected Trees.

<sup>46</sup> City of Inglewood, IMC Section 12-113, Protected Trees.

<sup>47</sup> City of Inglewood, IMC Section 12-113, Protected Trees.

<sup>48</sup> City of Inglewood, IMC Section 12-113, Protected Trees.

**Table 4.3-5**  
**Summary of Protected Trees Within Prairie Avenue/Hardy Street Station Site**

Common Name	Scientific Name	Quantity
Bird of Paradise	<i>Strelitzia reginae</i>	1
Carrotwood	<i>Cupaniopsis anacardioides</i>	1
Chinese Elm	<i>Ulmus parvifolia</i>	1
Mexican Ash	<i>Washingtonia robusta</i>	12
Mexican Fan Palm	<i>Syagrus romanzoffiana</i>	2
Queen palm	<i>Syagrus romanzoffiana</i>	15
<b>Total</b>		<b>32</b>

Source: *Tree Inventory*, Pax Environmental, Inc., September 10, 2021. Included as Appendix H.3 of this Recirculated Draft EIR.

#### Maintenance and Storage Facility (MSF)

The MSF is proposed on a site developed with an existing retail commercial building. The MSF building is proposed on the southern half of this site and the new replacement Vons store on the eastern half of the site.

Figure 4.3-7 through Figure 4.3-9 identify the existing trees associated the MSF/Vons site. Table 4.3-6: Summary of Protected Trees Within the MSF/Vons Site summarizes the types of trees associated with the MSF site. As shown in Table 4.3-6, a total of 119 protected trees are associated with the MSF/Vons site. Of these, 116 are located within the site and are considered private property. The remaining 3 trees are public street trees located along Nutwood Street. All protected trees identified within the MSF/Vons site consist of nonnative, ornamental tree species which are commonly used in ornamental landscaping. Protected tree species within this site predominantly consist of Mexican fan palm, River red gum, and Chinese elm. As no protected tree *species* were identified, the 119 trees identified as protected qualified as such by meeting the minimum trunk diameter size of 1.5 inches pursuant of the IMC Section 12-113.<sup>49</sup> The entirety of the MSF and new replacement Vons store would be developed within an area included in the Downtown TOD Plan. While the Downtown TOD Plan does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it does contain unique provisions and recommendations for the location of tree placement and types of tree species to be used.

<sup>49</sup> City of Inglewood, IMC Section 12-113, Protected Trees.

**Table 4.3-6**  
**Summary of Protected Trees Within the MSF/Vons Site**

Common Name	Scientific Name	Quantity
Chinese elm	<i>Ulmus parvifolia</i>	10
Liquidambar	<i>Liquidambar styraciflua</i>	8
Little-leaved Fig	<i>Ficus microcarpa</i>	3
Mexican fan palm	<i>Washingtonia robusta</i>	66
River Red Gum	<i>Eucalyptus camaldulensis</i>	32
<b>Total</b>		<b>119</b>

Source: Tree Inventory, Pax Environmental, Inc., December 10, 2018. Included as Appendix H.3 of this Recirculated Draft EIR.

### Power Distribution System Substations

The proposed Project would include two power distribution system (PDS) substations. These PDS substations will provide the necessary power for the proposed Project including traction power, auxiliary power, and housekeeping power for the stations and related infrastructure. One of the PDS substations will be located on the MSF site and the second PDS substation will be located on the Prairie Avenue/Hardy Street station site. As discussed above, the MSF site which includes the first PDS substation would be developed within an area included in the Downtown TOD Plan and would be subject to the tree requirements for this plan. The second PDS substation would be located within the Prairie Avenue/Hardy Street station site which is not located within a City plan but is subject to the provisions of the IMC.

#### 4.3.4.4 Wildlife

##### Birds

Common bird species historically observed near the proposed Project as noted in the CNDDB<sup>50</sup> and eBird<sup>51</sup> database include Brewer's Blackbird (*Euphagus cyanocephalus*), Black-bellied Plover (*Pluvialis squatarola*), Tricolored Blackbird (*Agelaius tricolor*), Canada Goose (*Branta canadensis*), Northern Rough-winged Swallow (*Stelgidopteryx serripennis*), American Coot (*Fulica americana*), Western Bluebird (*Sialia mexicana*), Lincoln's Sparrow (*Melospiza lincolni*), Brown-headed Cowbird (*Molothrus ater*), Cliff Swallow (*Petrochelidon pyrrhonota*), Bushtit (*Psaltriparus minimus*), white-crowned sparrow (*Zonotrichia leucophrys*), house finch (*Carpodacus mexicanus*), and the common house sparrow (*Passer domesticus*).<sup>52</sup> None of these species are sensitive or protected by State or federal law with the exception

50 CDFW, California Natural Diversity Database, "Maps and Data," accessed September 2021, <https://www.wildlife.ca.gov/Data/CNDDDB>.

51 Cornell Lab of Ornithology, *eBird*, "Hotspot Map," accessed September 2021, <https://ebird.org/home>.

52 Cornell Lab of Ornithology, *eBird*, "Hotspot Map," accessed September 2021, <https://ebird.org/home>.

of the Tricolored Blackbird (*Agelaius tricolor*), which is listed as a threatened species under CESA.<sup>53</sup> The Tricolored Blackbird (*Agelaius tricolor*) primarily nests in grasslands and freshwater wetlands and is not likely to nest in street trees.<sup>54</sup>

Given the nature that birds will nest in a variety of trees and other locations, the possibility exists that these species listed above, as well as others, may be present and nest in existing trees within the footprint of the proposed Project.

### Other Wildlife Species

Wildlife species identified during the most recent review of the CNDDB crotch bumble bee (*Bombus crotchii*) and pocketed free-tailed bat (*Nyctinomops femorosaccus*). However, observation of neither species has been recently recorded on site; observation of the pocketed free-tailed bat was last recorded in 1994 and the crotch bumble bee in 1953.<sup>55</sup>

Additionally, the CDFW describes the habitat used by the pocketed free-tailed bat as including rock crevices in cliffs in pinyon-juniper woodlands, desert scrub, desert succulent shrub, desert riparian, desert wash, alkali desert scrub, Joshua tree, and palm oasis.<sup>56</sup> Habitat used by the crotch bumble bee consists of shrubland and grassland.<sup>57</sup> None of these habitats occur within or are adjacent to the proposed Project.

Wildlife in the area predominantly consists of domesticated animals and pets, though wild animals that are capable of living in close proximity to man, such as birds, skunks, and squirrels, are found in the area.

#### 4.3.5 ADJUSTED BASELINE

As discussed previously, the street trees along Prairie Avenue have since been removed for the development of the HPSP. The HPSP area would be fully developed per the design guidelines of the HPSP, prior to the construction of the proposed Project.<sup>58</sup> The HPSP calls for large columnar evergreen trees such as Afghan pine (*Pinus eldarica*) or Canary Island pine (*Pinus canariensis*) along Prairie Avenue north of Hardy Street. This arrangement will visually reduce the scale of the street and will provide ample shade

53 California Endangered Species Act (CESA), Listing of Species Under the California Endangered Species Act, <https://fgc.ca.gov/CESA#tcbb2015>, accessed September 2021.

54 California Endangered Species Act (CESA), Listing of Species Under the California Endangered Species Act, <https://fgc.ca.gov/CESA#tcbb2015>, accessed September 2021.

55 CDFW, California Natural Diversity Database, "Maps and Data," accessed September 2021, <https://www.wildlife.ca.gov/Data/CNDDDB>.

56 CDFW, California Interagency Wildlife Task Group, *California Wildlife Habitat Relationships System*, "Pocketed Free-Tailed Bat," accessed September 2021, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2353>.

57 International Union for Conservation of Nature, "Crotch bumble bee," accessed September 2021, <https://www.iucnredlist.org/species/44937582/46440211>.

58 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Chapter 3, Design Guidelines.

as visitors approach the Hollywood Park entries. In addition, large-canopy flowering trees and palms will mark major entry points and maintain adequate street visibility.

Landscaping along Prairie Avenue would also include a setback area which would serve as a primary welcoming edge of Hollywood Park. The Prairie Avenue setback will feature drought-tolerant plantings which will add a lush Mediterranean character to the spaces. Specifically, plant materials within the formal entrances will include hedges, colorful flowering groundcovers, and various flowering trees. Taller evergreen hedges and shrubs will be used to create strong entry drives and to screen undesirable views.

#### 4.3.6 THRESHOLDS OF SIGNIFICANCE

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

**Threshold BIO-1:** Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

**Threshold BIO-2:** Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

#### 4.3.7 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

The proposed Project includes ITC Design Standards and Guidelines (Design Guidelines) and a Construction Commitment Program (CCP) as described in **Section 3.0: Project Description**. The CCP addresses temporary effects during construction of the Project. The Design Guidelines describe the design features of the proposed Project.

##### 4.3.7.1 Project Design Features

The proposed Project includes the following features that address impacts to trees during development of the proposed Project:

###### PDF AES-2 Tree Replacement

A Tree Removal and Replacement Plan will 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 Design Guidelines.

- Removal of existing healthy and flourishing trees will 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 will 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.

###### PDF AES-4 Tree Placement

- An arborist report surveying the condition and extents of all existing trees in the Project area will 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) will remain, where feasible.
- An Approved Plant Palette based on the City's approved street tree list will be used as a basis for all sections of new trees.
- The quantity and species of existing trees removed by the ITC Project will be replaced in accordance with the City's current landscape guidelines.
- Protected species in the Inglewood Municipal Code, Tree Preservation will remain.
- City of Inglewood guidelines for tree spacing will be followed, considering species of trees and the desired canopy coverage.
- Trees will be planted on both sides of the roadway where feasible.

#### 4.3 Biological Resources

- Trees will be positioned at regular intervals relative to the guideway column supports to create a consistent rhythm.
- On Market Street, trees will be planted at a rhythm and scale to create a continuous visual canopy over the pedestrian realm, where feasible.
- On Manchester Boulevard, trees will 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 will continue the stately rhythm from the Inglewood Cemetery north of Manchester Boulevard. Trees on the west side will be spaced to match the rhythm of the east side and the guideway support structure to the extent feasible.

The environmental impact analysis presented below is based on determinations made in the Initial Study for impacts considered to be potentially significant.

**Impact BIO-1: Would the project interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

Sensitive animal and plant species and vegetation communities identified by the CNDDDB as having the potential to occur within 0.25 mile radius of either side of the proposed Project, including the guideway stations, and MSF sites are largely absent. Due to their mobility, some sensitive bird species may utilize existing mature trees during migration but would not be supported as residents within this urbanized setting. With the exception of the small pond located within the Inglewood Park Cemetery, there are no wetland areas within 0.25 mile radius of either side of the proposed Project, including the guideway, stations, and MSF sites. Vegetation around this pond is nonnative, landscaped vegetation, but waterfowl were observed utilizing the small amount of open water there. No wildlife corridors exist within this area to support movement of wildlife species other than birds.

#### 4.3 Biological Resources

##### Construction

Common bird species historically observed in the area of the proposed Project as noted in the CNDDDB and eBird database include Brewer's Blackbird (*Euphagus cyanocephalus*), Black-bellied Plover (*Pluvialis squatarola*), Tricolored Blackbird (*Agelaius tricolor*), Canada Goose (*Branta canadensis*), Northern Rough-winged Swallow (*Stelgidopteryx serripennis*), American Coot (*Fulica americana*), Western Bluebird (*Sialia mexicana*), Lincoln's Sparrow (*Melospiza lincolni*), Brown-headed Cowbird (*Molothrus ater*), Cliff Swallow (*Petrochelidon pyrrhonota*), Bushtit (*Psaltriparus minimus*), white-crowned sparrow (*Zonotrichia leucophrys*), house finch (*Carpodacus mexicanus*), and the common house sparrow (*Passer domesticus*).<sup>59</sup> None of these species are sensitive or protected by State or federal law with the exception of the Tricolored Blackbird (*Agelaius tricolor*) which is listed as a threatened species under CESA.<sup>60</sup>

The review of the CNDDDB notes that the pocketed free-tailed bat (*Nyctinomops femorosaccus*) and crotch bumble bee (*Bombus crotchii*) have been observed within a one-mile area of the proposed Project, including the guideway and stations, and support facility sites. However, observations of neither species have been recently recorded in the area; the last recorded observation of the pocketed free-tailed bat was in 1994 and the crotch bumble bee in 1953.<sup>61</sup> Additionally, the CDFW describes the habitat used by the pocketed free-tailed bat as including rock crevices in cliffs in pinyon-juniper woodlands, desert scrub, desert succulent shrub, desert riparian, desert wash, alkali desert scrub, Joshua tree, and palm oasis.<sup>62</sup> Habitat used by the crotch bumble bee consists of shrubland and grassland.<sup>63</sup> Given that these species occur in specific habitats that do not occur within or near the proposed Project, including the guideway and stations, and support facility sites, as the area is completely developed and paved with no natural plant communities, the pocketed free-tailed bat or crotch bumble bee are not anticipated to be encountered within the proposed Project, including the guideway and stations, and support facility sites during demolition and clearing of existing vegetation, and construction.

The removal of trees will require that the proposed Project meet the requirements of the City's Municipal Code relative to tree preservation. In accordance with the IMC, the proposed Project will be required to plant replacement trees for every protected tree that would be removed within the areas subject to IMC provisions, after having obtained a permit to do so from the City.<sup>64</sup> Replacement trees are required to be

<sup>59</sup> Cornell Lab of Ornithology, *eBird*, "Hotspot Map," accessed September 2021, <https://ebird.org/home>.

<sup>60</sup> California Endangered Species Act (CESA), Listing of Species Under the California Endangered Species Act, <https://figc.ca.gov/CESA#tcbb2015>, accessed September 2021.

<sup>61</sup> CDFW, California Natural Diversity Database, "Maps and Data," accessed September 2021, <https://www.wildlife.ca.gov/Data/CNDDDB>.

<sup>62</sup> CDFW, California Interagency Wildlife Task Group, *California Wildlife Habitat Relationships System*, "Pocketed Free-Tailed Bat," accessed September 2021, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2353>.

<sup>63</sup> International Union for Conservation of Nature, "Crotch bumble bee," accessed September 2021, <https://www.iucnredlist.org/species/44937582/46440211>.

<sup>64</sup> City of Inglewood, IMC Section 12-113, Protected Trees.

replaced at a 1:1 ratio minimum and with a tree of like-size and species or an equal value tree (or trees) as determined by the City. To comply with the requirements of the Tree Preservation Ordinance, an application for a Protected Tree Removal or Cutting Permit must be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee Schedule.<sup>65</sup> The application must be filed and approved prior to any tree removal, relocation or cutting, per City Ordinance.<sup>66</sup>

Several common bird species were historically observed in the area as noted in the CNDDDB and eBird database. As discussed previously, a total of approximately 502 trees have been recorded along the ATS. Given the nature that birds will nest in a variety of trees and other locations, the possibility exists that trees located within the ATS may provide habitat for wildlife.

Demolition and clearing of existing vegetation, and construction of the guideway and supporting facilities would result in removal and/or trimming of trees and other ornamental vegetation along the ATS. As such, removal and/or trimming of trees along the ATS could result in impacts to migratory or nesting birds, or raptors protected under the MBTA,<sup>67</sup> CESA,<sup>68</sup> and/or California Fish and Game Code.<sup>69</sup>

Impacts to biological resources from demolition and clearing of existing vegetation, and construction of the proposed Project are potentially significant because tree and vegetation trimming or removal could interfere with the movement of resident or migratory wildlife species that could occur within the area.

#### Summary of Construction Impacts

The loss of trees along the proposed Project, including the guideway and stations, and support facility sites could reduce nesting opportunities for birds. While preservation of the existing trees will be prioritized, in the case where trimming and tree removal is unavoidable, loss of these trees could be considered a potentially significant impact that could affect wildlife movement.

#### *Operation*

#### Guideway and Stations

<sup>65</sup> City of Inglewood, Master Fee Schedule, September 2016.

<sup>66</sup> City of Inglewood, Ordinance 12-06 5-8-12 and Ordinance 13-04 11-5-13.

<sup>67</sup> U.S. Fish and Wildlife Service (USFWS), Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712; Ch. 128; July 3, 1918; 40 Stat. 755) as amended by: Chapter 634; June 20, 1936; 49 Stat. 1556; P.L. 86-732; September 8, 1960; 74 Stat. 866; P.L. 90-578; October 17, 1968; 82 Stat. 1118; P.L. 91-135; December 5, 1969; 83 Stat. 282; P.L. 93-300; June 1, 1974; 88 Stat. 190; P.L. 95-616; November 8, 1978; 92 Stat. 3111; P.L. 99-645; November 10, 1986; 100 Stat. 3590 and P.L. 105-312; October 30, 1998; 112 Stat. 2956

<sup>68</sup> California, Fish and Game Code, Section 2050 et. seq. California Endangered Species Act.

<sup>69</sup> California Department of Fish and Wildlife, Fish and Game Code (FGC), Division 4. Birds and Mammals, [3000 - 4904] ( Division 4 enacted by Stats. 1957, Ch. 456), Part 2. Birds [3500 - 3864] ( Part 2 enacted by Stats. 1957, Ch. 456)

Operation of the proposed Project, including ATS trains using the guideway and stations, would be within an urbanized area of the City. Operation of the guideway and stations would not create a significant change in habitat value or nesting sites. The guideway and stations would involve the construction of new buildings and structures, some of which would have windows that could pose obstacles to migratory birds. However, compared to the existing commercial uses to be removed, the guideway and stations would not include an increased number of windows which may impede migratory birds within the vicinity. During operation of the guideway and stations, it is possible that migratory or nesting birds would build nests within the structure or near the area. However, operation of the guideway and stations would not substantially interfere with these nests once built as the majority of the Project components would remain stationary with exception of the ATS train cars.

The Design Guidelines, contained in **Appendix C**, include sustainability guidelines included that define a list of green measures to be incorporated into the design, construction, and operations of the ITC facilities. Exterior lighting associated with these structures would be consistent with the Design Guidelines for the proposed Project. The Design Guidelines would serve to provide for well designed, energy efficient site lighting that contributes to a safe and inviting atmosphere without casting light into the night sky or adjacent properties. This would be accomplished through measures such as light shielding, automatic controls, and architectural compatibility in design, among others. These measures would have the additional effect of minimizing the potential for lighting of the guideway and stations to attract or disorient nocturnal migrating birds.

The guideway and stations would not diminish the chances for long-term survival of bird species or their habitats. Throughout operation vegetation maintenance and abatement would be performed as needed for City street trees and landscaping on the station and MSF sites. No additional tree and/or ornamental vegetation removals are planned and, as such, no significant impacts to nesting birds/raptors would occur from the operation of the guideway and stations.

#### Support Facilities

#### **Maintenance and Storage Facility**

Operation of the MSF would be within an existing retail plaza which is located within an urbanized area of the City. As mentioned previously, a replacement Vons store would be developed on the MSF site prior to construction of the proposed Project. The replacement Vons store would be reduced in size compared to the existing Vons store. Operation of the MSF site would not create a significant change in habitat value or nesting sites. The MSF site would include the construction of an approximately 75,000 square-foot building which would have windows that could pose obstacles to migratory birds. However, compared to the existing commercial uses, the MSF would not include an increased number of windows which may

#### 4.3 Biological Resources

impede migratory birds in the vicinity. During operation of the MSF site, it is possible that migratory or nesting birds would build nests within the structure or near the area. However, operation of the MSF site would not substantially interfere with these nests once built as the majority of the Project components would remain stationary with exception of the ATS train cars.

Exterior lighting associated with this site would be consistent with the lighting already in place in this area and any new or remodeled lighting would be consistent with the Design Guidelines for the proposed Project. The Design Guidelines would serve to provide for well designed, energy efficient site lighting that contributes to a safe and inviting atmosphere without casting light into the night sky or adjacent properties. This would be accomplished through measures such as light shielding, automatic controls, and architectural compatibility in design, among others. These measures would have the additional effect of minimizing the potential for lighting of the MSF site to attract or disorient nocturnal migrating birds.

The MSF site would not diminish the chances for long-term survival of bird species or their habitats. Throughout operation vegetation maintenance and abatement would be performed as needed for City street trees and the proposed Project's landscaping. No additional tree and/or ornamental vegetation removals are planned and, as such, no significant impacts to nesting birds/raptors would occur from the operation of the MSF site.

#### Power Distribution System Substations

As discussed previously, the PDS substations would be located within the MSF site and the Prairie Avenue/Hardy Street station site which are analyzed above. The PDS substations would involve the construction of new buildings and structures, some of which would have windows that could pose obstacles to migratory birds. However, as there are no native or nonnative vegetated corridors in the proximity of the proposed Project, the potential impact of these structures on migratory birds is anticipated to be minimal. During operation of the PDS substations, it is possible that migratory or nesting birds would build nests within or near the area. However, operation of the PDS substations would not substantially interfere with these nests once built as the majority of the Project components would remain stationary with exception of the ATS train cars.

Exterior lighting associated with these sites would be consistent with the lighting already in place in this area and any new or remodeled lighting would be consistent with the Design Guidelines for the proposed Project. The Design Guidelines would serve to provide for well designed, energy efficient site lighting that contributes to a safe and inviting atmosphere without casting light into the night sky or adjacent properties. This would be accomplished through measures such as light shielding, automatic controls, and architectural compatibility in design, among others. These measures would have the additional effect of

#### 4.3 Biological Resources

minimizing the potential for lighting of the PDS substations to attract or disorient nocturnal migrating birds.

The PDS substations would not diminish the chances for long-term survival of bird species or their habitats. Throughout operation vegetation maintenance and abatement would be performed as needed for City street trees and proposed Project's landscaping. No additional tree and/or ornamental vegetation removals are planned and, as such, no significant impacts to nesting birds/raptors would occur from the operation of the PDS substations.

#### Summary of Operational Impacts

As described, the 0.25-mile radius area surrounding the proposed Project, including the guideway and stations, and support facility sites, is heavily urbanized. Due to lack of suitable habitat, no listed sensitive species are anticipated to occur. Further, there are no sensitive ecological areas, wetlands, or wildlife migratory corridors within the 0.25-mile radius area of the proposed Project.

Operation of the proposed Project would not result in significant impacts to such biological resources with respect to interfering with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impeding the use of native wildlife nursery sites.

#### *Mitigation Measures*

The following Mitigation Measures (MMs) have been identified to mitigate the impacts of the Project to less than significant.

#### Construction

**MM BIO-1: Conservation of Faunal Resources: Nesting Birds/Raptors.** 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 (6) months until the completion of construction activities, as specified below.

Nesting bird survey shall include:

- Prior to any demolition and/or construction, and at least every six (6) 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 at least every six (6) 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 demolitions 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 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.

#### Operation

No mitigation is required for biological resources during operation of the proposed Project.

#### Level of Significance after Mitigation

#### Construction

With implementation of **MM BIO-1**, significant impacts to nesting birds/raptors would be reduced to a level that is less than significant. These measures would prevent substantial interference with the movement of resident or migratory wildlife species through protecting nesting birds/raptors.

#### Operation

Impacts to biological resources would be less than significant.

#### **Impact BIO-2: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

As detailed under existing conditions, approximately 502 trees exist along the proposed Project, including the guideway and stations, and support facility sites. Loss of these trees would be considered a significant impact if removal and replacement of these trees does not comply with the City's tree preservation ordinance. To comply with the requirements of the Tree Preservation Ordinance, an application for a Protected Tree Removal or Cutting Permit is required to be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee Schedule.<sup>70</sup> This application is required to be filed and approved prior to any tree removal, relocation or cutting, per City Ordinance.<sup>71</sup>

#### Construction

This section discusses the potential impacts to trees that may be impacted as a result of the proposed Project. As previously noted, construction of the guideway and stations would include equipment staging areas that may reach 22 feet from the guideway. As such, this analysis conservatively assumed that all existing trees within 25 feet of the proposed guideway and stations, and the MSF and PDS substation sites could be removed during construction. The locations of trees with respect to the proposed Project are shown in **Figure 4.3-1: Potential Tree Impacts – Market Street/Florence Avenue Station(a)** through **Figure 4.3-18: Potential Tree Impacts – Prairie Avenue(f)** and are available at the end of this section.

#### Guideway

##### **Market Street**

As discussed previously, a total of approximately 45 trees exist along Market Street. All of these trees are located within the Downtown TOD Plan and qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.<sup>72</sup> The proposed guideway along Market Street in relation to the existing trees is shown in **Figure 4.3-2, Figure 4.3-4, and Figure 4.3-5**. As shown, 35 trees are located within the path of the guideway or within the 25-foot construction equipment staging zone. As such, these trees may be removed during construction.

In accordance with the City's Tree Preservation Ordinance, replacement trees will be planted for every protected tree that would be removed within areas after a permit is approved for tree removal.<sup>73</sup> Replacement trees will be replaced at a 1:1 ratio minimum with a tree of like-size and species or an equal value tree (or trees) as determined by the City. Due to compliance with the requirements of the Tree

<sup>70</sup> City of Inglewood, Master Fee Schedule, September 2016.

<sup>71</sup> City of Inglewood, Ordinance 12-06 5-8-12 and Ordinance 13-04 11-5-13.

<sup>72</sup> City of Inglewood, IMC Section 12-113, Protected Trees.

<sup>73</sup> City of Inglewood, IMC Section 12-113, Protected Trees.

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Preservation Ordinance, an application for a Protected Tree Removal or Cutting Permit shall be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee Schedule.<sup>74</sup> This application will be filed and approved prior to any tree removal, relocation or cutting, per City Ordinance.<sup>75</sup>

In addition to being subject to the IMC, the trees along Market Street would be developed within the Downtown TOD Plan area, as shown in **Figure 3.0-2**. While the Downtown TOD Plan does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it contains unique provisions and recommendations for the location of tree placement and types of tree species.

In particular, the Downtown TOD Plan calls for Market Street to retain its existing street trees, and the smaller arterial streets including Regent Street and Locust Street may alternate between the Brisbane box (*Lophostemon confertus*), an evergreen tree, and the ginkgo (*Ginkgo biloba*), a deciduous tree.

As the proposed Project will comply with the City's Tree Preservation ordinance, **PDF AES-2**, and **PDF AES-4**, impacts will be less than significant.

##### **Manchester Boulevard**

As discussed previously, a total of approximately 152 trees exist along Manchester Boulevard. All of these trees are located within the Downtown TOD Plan and qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.<sup>76</sup> The proposed guideway along Manchester Boulevard in relation to the existing trees is shown in **Figure 4.3-5 through Figure 4.3-7, and Figure 4.3-9 through Figure 4.3-12**. As shown, 64 trees are located within the path of the guideway or within the 25-foot construction equipment staging zone. As such, these trees may be removed during construction.

In accordance with the IMC, the proposed Project shall plant replacement trees for every protected tree that would be removed within areas subject to IMC provisions, after having obtained a permit to do so.<sup>77</sup> Replacement trees shall be replaced at a 1:1 ratio minimum and shall be like-size and species or an equal value tree (or trees) as determined by the City. Due to compliance with the requirements of the Tree Preservation Ordinance, an application for a Protected Tree Removal or Cutting Permit shall be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee Schedule.<sup>78</sup> The application shall be filed and approved prior to any tree removal, relocation or cutting,

<sup>74</sup> City of Inglewood, Master Fee Schedule, September 2016.

<sup>75</sup> City of Inglewood, Ordinance 12-06 5-8-12 and Ordinance 13-04 11-5-13.

<sup>76</sup> City of Inglewood, IMC Section 12-113, Protected Trees.

<sup>77</sup> City of Inglewood, IMC Section 12-113, Protected Trees.

<sup>78</sup> City of Inglewood, Master Fee Schedule, September 2016.

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per City Ordinance.<sup>79</sup> In addition to being subject to the IMC, the trees along Manchester Boulevard would be developed within the Downtown TOD Plan area, as shown in **Figure 3.0-2**. While the Downtown TOD Plan does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it contains unique provisions and recommendations for the location of tree placement and types of tree species.

In particular, the Downtown TOD Plan identifies Manchester Boulevard as a Green Boulevard which would have green dividers that separate bike lanes from traffic lanes. The Downtown TOD Plan states that Green Boulevards should be lined with London Plane trees, or a similar species.

As the proposed Project will comply with the City's Tree Preservation ordinance, **PDF AES-2**, and **PDF AES-4**, impacts will be less than significant.

##### **Prairie Avenue**

As discussed previously, a total of approximately 74 trees have been recorded along Prairie Avenue and qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.<sup>80</sup> The proposed guideway along Prairie Avenue in relation to the existing trees is shown in **Figures 4.3-12 through 4.3-18**. As shown, 28 trees are located within the path of the guideway or within the 25-foot construction equipment staging zone. As such, these trees may be removed during construction.

In accordance with the City's Tree Preservation Ordinance, replacement trees will be planted for every protected tree that would be removed within areas after a permit is approved for tree removal.<sup>81</sup> Replacement trees will be replaced at a 1:1 ratio minimum with a tree of like-size and species or an equal value tree (or trees) as determined by the City. Due to compliance with the requirements of the Tree Preservation Ordinance, an application for a Protected Tree Removal or Cutting Permit shall be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee Schedule.<sup>82</sup> This application will be filed and approved prior to any tree removal, relocation or cutting, per City Ordinance.<sup>83</sup>

The HPSP area is located adjacent to the approximately 0.5-mile portion of the Prairie Avenue segment of the guideway. The east side of Prairie Avenue is subject to the HPSP while the west side is subject to the IMC. The guideway and support columns would be located on the west side of Prairie Avenue and would not directly impact the setback of the HPSP area along Prairie Avenue. The relocation of the travel lanes

<sup>79</sup> City of Inglewood, Ordinance 12-06 5-8-12 and Ordinance 13-04 11-5-13.

<sup>80</sup> City of Inglewood, IMC Section 12-113, Protected Trees.

<sup>81</sup> City of Inglewood, IMC Section 12-113, Protected Trees.

<sup>82</sup> City of Inglewood, Master Fee Schedule, September 2016.

<sup>83</sup> City of Inglewood, Ordinance 12-06 5-8-12 and Ordinance 13-04 11-5-13.

for Prairie Avenue into the setback area would impact existing landscaping, installed in accordance with the design guidelines in the HPSP.<sup>84</sup> The HPSP calls for large columnar evergreen trees such as Afghan pine (*Pinus eldarica*) or Canary Island pine (*Pinus canariensis*) along Prairie Avenue north of Hardy Street. This arrangement will visually reduce the scale of the street and will provide ample shade as visitors approach the Hollywood Park entries. In addition, large-canopy flowering trees and palms will mark major entry points and maintain adequate street visibility.

Landscaping along Prairie Avenue would also include a setback area which would serve as a primary welcoming edge of Hollywood Park. The Prairie Avenue setback will feature drought-tolerant plantings which will add a lush Mediterranean character to the spaces. Specifically, plant materials within the formal entrances will include hedges, colorful flowering groundcovers, and various flowering trees. Taller evergreen hedges and shrubs will be used to create strong entry drives and to screen undesirable views.

As the proposed Project will comply with the City's Tree Preservation ordinance, **PDF AES-2**, and **PDF AES-4**, impacts will be less than significant.

### Stations

#### **Market Street/Florence Avenue Station**

As discussed previously, a total of approximately 78 trees are associated with the Market Street/Florence Avenue station site. Of these, 58 are located within the site and are considered private property. The remaining 20 trees are public street trees located throughout the perimeter of the site along Florence Avenue, Locust Street, and Regent Street. These trees are located within the Downtown TOD Plan and qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.<sup>85</sup> The proposed Market Street/Florence Avenue station in relation to the existing trees is shown in **Figure 4.3-1** through **Figure 4.3-3**. The area within the site boundaries of the Market Street/Florence Avenue station site would be demolished during construction. As such, these trees may be removed during construction.

In accordance with the City's Tree Preservation Ordinance, replacement trees will be planted for every protected tree that would be removed within areas after a permit is approved for tree removal.<sup>86</sup> Replacement trees will be replaced at a 1:1 ratio minimum with a tree of like-size and species or an equal value tree (or trees) as determined by the City. Due to compliance with the requirements of the Tree Preservation Ordinance, an application for a Protected Tree Removal or Cutting Permit shall be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee

<sup>84</sup> City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Chapter 3, Design Guidelines.

<sup>85</sup> City of Inglewood, IMC Section 12-113, Protected Trees.

<sup>86</sup> City of Inglewood, IMC Section 12-113, Protected Trees.

Schedule.<sup>87</sup> This application will be filed and approved prior to any tree removal, relocation or cutting, per City Ordinance.<sup>88</sup>

In addition to being subject to the IMC, the trees within the Market Street/Florence Avenue station site would be developed within the Downtown TOD Plan area, as shown in **Figure 3.0-2**. While the Downtown TOD Plan does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it contains unique provisions and recommendations for the location of tree placement and types of tree species.<sup>89</sup> In particular, the Downtown TOD Plan calls for Market Street to retain its existing street trees, and the smaller arterial streets including Regent Street and Locust Street may alternate between the Brisbane box (*Lophostemon confertus*), an evergreen tree, and the ginkgo (*Ginkgo biloba*), a deciduous tree.

As the Project will comply with the City's Tree Preservation ordinance, **PDF AES-2**, and **PDF AES-4**, impacts will be less than significant.

#### **Prairie Avenue/Manchester Boulevard Station**

As discussed previously, the trees identified within the Prairie Avenue/Manchester Boulevard station site have been removed since the 2018 *Tree Inventory* was conducted. The supplemental 2021 *Tree Inventory* identified two additional trees located adjacent to the site along Nutwood Street. These trees qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.<sup>90</sup> The proposed Prairie Avenue/Manchester Boulevard station in relation to the existing trees is shown in **Figure 4.3-12**. The area within the site boundaries of the Prairie Avenue/Manchester Boulevard station site would be disturbed during construction. As such, these trees may be removed during construction.

In accordance with the City's Tree Preservation Ordinance, replacement trees will be planted for every protected tree that would be removed within areas after a permit is approved for tree removal.<sup>91</sup> Replacement trees will be replaced at a 1:1 ratio minimum with a tree of like-size and species or an equal value tree (or trees) as determined by the City. Due to compliance with the requirements of the Tree Preservation Ordinance, an application for a Protected Tree Removal or Cutting Permit shall be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee

<sup>87</sup> City of Inglewood, Master Fee Schedule, September 2016.

<sup>88</sup> City of Inglewood, Ordinance 12-06 5-8-12 and Ordinance 13-04 11-5-13.

<sup>89</sup> City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, November 1, 2016.

<sup>90</sup> City of Inglewood, IMC Section 12-113, Protected Trees.

<sup>91</sup> City of Inglewood, IMC Section 12-113, Protected Trees.

Schedule.<sup>92</sup> This application will be filed and approved prior to any tree removal, relocation or cutting, per City Ordinance.<sup>93</sup>

As the proposed Project will comply with the City's Tree Preservation ordinance, **PDF AES-2**, and **PDF AES-4**, impacts will be less than significant.

#### **Prairie Avenue/Hardy Street Station**

As discussed previously, a total of approximately 32 private trees are associated with the Prairie Avenue/Hardy Street station site. These trees qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.<sup>94</sup> The proposed Prairie Avenue/Hardy Street station in relation to the existing trees is shown in **Figure 4.3-17** and **Figure 4.3-18**. The area within the site boundaries of the Prairie Avenue/Hardy Street station site would be demolished during construction. As such, these trees may be removed during construction.

In accordance with the City's Tree Preservation Ordinance, replacement trees will be planted for every protected tree that would be removed within areas after a permit is approved for tree removal.<sup>95</sup> Replacement trees will be replaced at a 1:1 ratio minimum with a tree of like-size and species or an equal value tree (or trees) as determined by the City. Due to compliance with the requirements of the Tree Preservation Ordinance, an application for a Protected Tree Removal or Cutting Permit shall be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee Schedule.<sup>96</sup> This application will be filed and approved prior to any tree removal, relocation or cutting, per City Ordinance.<sup>97</sup>

The HPSP area is located adjacent to the Prairie Avenue/Hardy Street station site. The east side of Prairie Avenue is subject to the HPSP while the west side is subject to the IMC. The Prairie Avenue/Hardy Street station would not be situated within the setback of the HPSP area along Prairie Avenue. Moreover, the street trees along the east side of Prairie Avenue have since been removed for the development of the HPSP area. The HPSP area would be fully developed prior to the construction of the proposed Project. Specifically, Prairie Avenue would be developed per the design guidelines of the HPSP.<sup>98</sup> The HPSP calls for large columnar evergreen trees such as Afghan pine (*Pinus eldarica*) or Canary Island pine (*Pinus canariensis*) along Prairie Avenue north of Hardy Street. This arrangement will visually reduce the scale of

<sup>92</sup> City of Inglewood, Master Fee Schedule, September 2016.

<sup>93</sup> City of Inglewood, Ordinance 12-06 5-8-12 and Ordinance 13-04 11-5-13.

<sup>94</sup> City of Inglewood, IMC Section 12-113, Protected Trees.

<sup>95</sup> City of Inglewood, IMC Section 12-113, Protected Trees.

<sup>96</sup> City of Inglewood, Master Fee Schedule, September 2016.

<sup>97</sup> City of Inglewood, Ordinance 12-06 5-8-12 and Ordinance 13-04 11-5-13.

<sup>98</sup> City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Chapter 3, Design Guidelines.

the street and will provide ample shade as visitors approach the Hollywood Park entries. In addition, large-canopy flowering trees and palms will mark major entry points and maintain adequate street visibility.

Landscaping along Prairie Avenue would also include a setback area which would serve as a primary welcoming edge of Hollywood Park. The Prairie Avenue setback will feature drought-tolerant plantings which will add a lush Mediterranean character to the spaces. Specifically, plant materials within the formal entrances will include hedges, colorful flowering groundcovers, and various flowering trees. Taller evergreen hedges and shrubs will be used to create strong entry drives and to screen undesirable views.

As the proposed Project will comply with the City's Tree Preservation ordinance, **PDF AES-2**, and **PDF AES-4**, impacts will be less than significant.

#### **Support Facilities**

##### **Maintenance and Storage Facility**

As discussed previously, a total of approximately 119 trees are located on the MSF site and the adjacent site for the new Vons replacement store. Of these, 116 are located within the site and are considered private property. The remaining 3 trees are public street trees located along Nutwood Street. These trees qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.<sup>99</sup> The proposed MSF site in relation to the existing trees is shown in Figure 4.3-7 through Figure 4.3-9. All uses within the MSF site would be demolished prior to construction. As such, these trees may be removed during construction.

The MSF site is located within an area bound by the Downtown TOD Plan which supersedes the provisions within the IMC. While the Downtown TOD Plan does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it does contain unique provisions and recommendations for the location of tree placement and types of tree species.

In particular, the Downtown TOD Plan recommends that Manchester Boulevard be lined with London Plane trees, or a similar species.

As the proposed Project will comply with the City's Tree Preservation ordinance, **PDF AES-2**, and **PDF AES-4**, impacts will be less than significant.

<sup>99</sup> City of Inglewood, IMC Section 12-113, Protected Trees.

### PDS Substations

The proposed Project would include two PDS substations located at the MSF site and the Prairie Avenue/Hardy Street station site which are analyzed above.

As discussed previously, the MSF site is located within an area bound by the Downtown TOD Plan which supersedes the provisions within the IMC. While the Downtown TOD Plan does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it does contain unique provisions and recommendations for the location of tree placement and types of tree species.

In particular, the Downtown TOD Plan recommends that Manchester Boulevard be lined with London Plane trees, or a similar species.

The HPSP area is located adjacent to the Prairie Avenue/Hardy Street station site. The east side of Prairie Avenue is subject to the HPSP while the west side is subject to the IMC. The Prairie Avenue/Hardy Street station would not be situated within the setback of the HPSP area along Prairie Avenue. The HPSP area would be fully developed prior to the construction of the proposed Project. Specifically, Prairie Avenue would be developed per the design guidelines of the HPSP.<sup>100</sup>

As the proposed Project will comply with the City's Tree Preservation ordinance, **PDF AES-2**, and **PDF AES-4**, impacts will be less than significant.

### Summary of Construction Impacts

As discussed above, the proposed Project will comply with the City's Tree Preservation ordinance, **PDF AES-2**, and **PDF AES-4**. Impacts from the removal of trees to construct the proposed Project will be less than significant.

### Operation

#### Guideway and Stations

Operation of the proposed Project, including the guideway and the three proposed stations, support facility sites, including trains using the guideway and stations, would be within an urbanized area of the City. The operation of the guideway and stations would introduce different land uses within the public rights-of-way and adjacent properties co-located with the proposed Project. The guideway and stations would introduce new ornamental landscaping, as well as new lighting associated with the guideway, stations, and passenger access areas. The new ornamental trees and landscaping could be illuminated by

<sup>100</sup> City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Chapter 3, Design Guidelines.

nighttime lighting and would be located in highly urbanized, active locations. Because the proposed Project is located in a highly urbanized area with existing light, noise, and activity, increased lighting, noise, and activity associated with the guideway and stations would not significantly affect the activities of birds within the area. Additionally, birds that occur within the existing area are highly adapted to living within urbanized areas; the guideway and stations would be consistent with the urbanized developments in the vicinity.

As previously noted, the City of Inglewood Tree Preservation Ordinance governs the removal or modification of protected trees within the City.<sup>101</sup> The proposed Project would follow the applicable program (Downtown TOD, HPSP, and IMC as applicable) for the area the guideway and stations it is under. Operation of the guideway and stations would require landscaping maintenance activities; however, no additional tree and/or ornamental vegetation removals are planned. As such, no significant impacts regarding conflict with local policies or ordinances protecting biological resources would occur from the operation of the guideway and stations.

### Support Facilities

#### Maintenance and Storage Facility

Operation of the MSF site would be within an urbanized area of the City. As mentioned previously, a replacement Vons store would be developed on the MSF site prior to construction of the proposed Project. The operation of the MSF site would introduce different land uses within the public rights-of-way and adjacent properties along Manchester Boulevard. The MSF site would introduce new ornamental landscaping, as well as new lighting associated with passenger access areas and support facilities. The new ornamental trees and landscaping could be illuminated by nighttime lighting and would be located in highly urbanized, active locations. Because the proposed Project is located in a highly urbanized area, increased lighting, noise, and activity associated with MSF site would not significantly affect the activities of birds within the area. Additionally, birds that occur within the existing area are highly adapted to living within urbanized areas; the MSF would be consistent with the urbanized developments in the vicinity.

As discussed previously, the City of Inglewood Tree Preservation Ordinance governs the removal or modification of protected trees within the City.<sup>102</sup> Operation of the MSF site would require landscaping maintenance activities similar to existing uses; however, no additional tree and/or ornamental vegetation removals are planned. As such, no significant impacts regarding conflict with local policies or ordinances protecting biological resources would occur from the operation of the MSF site.

<sup>101</sup> City of Inglewood Tree Preservation Ordinance (IMC Section Chapter 12, Article 32).

<sup>102</sup> City of Inglewood Tree Preservation Ordinance (IMC Section Chapter 12, Article 32).

**PDS Substations**

The proposed Project would include two PDS substations located at the MSF site and the Prairie Avenue/Hardy Street station site which are analyzed above.

As discussed previously, these sites could introduce new ornamental landscaping, as well as new lighting associated with p access areas and support facilities. The new ornamental trees and landscaping could be illuminated by nighttime lighting and would be located in highly urbanized, active locations. Because the proposed Project is located in a highly urbanized area, increased lighting, noise, and activity associated with these sites would not significantly affect the activities of birds within the area. Additionally, birds that occur within the existing area are highly adapted to living within urbanized areas; these sites would be consistent with the urbanized developments in the vicinity.

As previously noted, the City of Inglewood Tree Preservation Ordinance governs the removal or modification of protected trees within the City.<sup>103</sup> Operation of these sites would require landscaping maintenance activities similar to existing uses; however, no additional tree and/or ornamental vegetation removals are planned. As such, no significant impacts regarding conflict with local policies or ordinances protecting biological resources would occur from the operation of these sites.

**Summary of Operational Impacts**

Operation of the proposed Project including the guideway and stations, support facility sites, would not conflict with any existing policies or ordinances protecting biological resources including the City's Tree Preservation Ordinance, or the provisions identified in either the Downtown TOD or HPSP. Impacts would be less than significant.

**Mitigation Measures****Construction**

No mitigation is required due to conflicts existing policies or ordinances protecting biological resources.

**Operation**

No mitigation is required due to conflicts existing policies or ordinances protecting biological resources.

<sup>103</sup> City of Inglewood Tree Preservation Ordinance (IMC Section Chapter 12, Article 32).

**Level of Significance after Mitigation****Construction**

Impacts due to conflicts existing policies or ordinances protecting biological resources would be less than significant.

**Operation**

Impacts due to conflicts existing policies or ordinances protecting biological resources would be less than significant.

**4.3.8 CUMULATIVE IMPACTS**

Cumulative development projects in the vicinity of the proposed Project, described in **Section 4.0: Environmental Impact Analysis, 4.0.6: Cumulative Assumptions**, would result in potentially significant impacts to biological resources.

The City of Inglewood is located within a highly developed and urbanized area and potential biological resources are limited to a few small parks and the Inglewood Park Cemetery. These parks are primarily landscaped areas and wildlife species utilizing the parks are mostly those adapted to living in an urban environment. The geographic scope of analysis for cumulative impacts related to biological resources varies for each resource. Regarding the movement of wildlife species, which are limited to common species found in urban environments as identified above, it is considered to be the vicinity surrounding the proposed Project.

The proposed Project is located entirely in a disturbed and/or developed area and supports limited biological resources, with the exception of trees and ornamental shrubs that may provide nesting habitat for birds, including trees that are protected in accordance with the local municipal code. The geographic scope of analysis for cumulative impacts related to protected trees is the City. While migratory birds may occur within the proposed Project, including the guideway and stations, support facility sites, the quality of the habitat is low due to the absence of native habitat and open space, the level of disturbance (existing levels of urban activity and lighting from adjacent uses), and a lack of suitable habitat in the vicinity. As such, migratory bird habitat within the footprint of the proposed Project and vicinity is limited to mainly nonnative ornamental trees.

It is likely that the common, urbanized species, including migratory species, would continue to use the vegetation that exists within the urbanized areas that surround the proposed Project. Therefore, the loss of trees from demolition and construction of the proposed Project would not result in a substantial or significant decline of bird nesting habitat in the region. Implementation of mitigation measures would

#### 4.3 Biological Resources

ensure that bird nests are avoided during the demolition or construction phases of the proposed Project. Compliance with the IMC would require that replacement trees and landscaping that would ensure that the urban habitat for birds is maintained.

The proposed Project, in conjunction with cumulative development within the vicinity of the proposed Project, demolition, construction or operational activities would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

Therefore, the Project's potential to contribute to a significant cumulative impact related to biological resources would not be cumulatively considerable.

#### 4.3.9 CONSISTENCY WITH CITY OF INGLEWOOD GENERAL PLAN

The proposed Project will comply with the City's Tree Preservation ordinance, **PDF AES-2**, and **PDF AES-4**.

The Conservation Element of the City's General Plan was adopted in October 1997 and addresses the conservation, development, and use of natural resource including water, soils, lakes, and mineral deposits.<sup>104</sup> The Conservation Element notes that resources which are typically addressed in conservation elements, including biological resources such as forests, wildlife, fisheries, shorelines, and agricultural land, are not found in Inglewood.

The Land Use Element of the City's General Plan describes tree masses as an important component the physical environment of the City.<sup>105</sup> The Land Use Element states that trees are not merely aesthetic elements of the urban setting, but also provide beneficial effects such as noise attenuation, amelioration of air pollution and dust, and temperature control. As such, landowners are encouraged to plant trees to realize these benefits. The General Plan does not address biological resources any further.

The proposed Project would comply with the requirements of the IMC Tree Preservation Ordinance, **PDF AES-2**, and **PDF AES-4**. Implementation of incorporated features and actions of the CCP would address the removal of trees and the requirements for the replacement of the loss of protected trees at a 1:1 ratio per City requirements. As such, the proposed Project would help ensure the maintenance of a robust urban forest in the City and would not conflict with any goal, objective, or policy of the City's General Plan related to biological resources.

<sup>104</sup> City of Inglewood *General Plan*, "Conservation Element" (1997).

<sup>105</sup> City of Inglewood *General Plan*, "Land Use Element" (adopted 1980, amended 1986, 2009, and 2016).

## 4.4 CULTURAL RESOURCES

### 4.4.1 INTRODUCTION

This section of the Recirculated Draft Environmental Impact Report (Recirculated Draft EIR) evaluates the potential for the proposed Inglewood Transit Connector Project (proposed Project or ITC Project) to impact cultural resources within the proposed Project area.

Cultural resources include places, objects, and settlements that reflect group or individual religious, archaeological, architectural, or paleontological activities. Such resources provide information on scientific progress, environmental adaptations, group ideology, or other human advancements. Information from the following studies of the Project area is incorporated into this section:

- *Cultural Resource Investigation*, Roberta Thomas, M.A., RPA, and Gena Granger, M.A., RPA, PaleoWest Archaeology (PaleoWest), December 4, 2018 (**Appendix I.1**);
- *Historic Resources Technical Report*, Paul Travis, AICP, and Kari Fowler, Historic Resources Group (HRG), October 4, 2021 (**Appendix I.2**); and
- *Historic Preservation Memo*, Teresa Grimes, October 7, 2021 (**Appendix I.3**).

After circulation of the December 2020 Draft EIR for public review, the City revised the design of the Project in response consultation with key stakeholders in the community and comments received on the December 2020 Draft EIR. The *Historic Resources Technical Report* (see **Appendix I.2**) was peer reviewed in a *Historic Preservation Memo* (see **Appendix I.3**) and updated in response to comments received addressing historic buildings. Changes to the Project relevant to the potential effects of the Project on historic buildings include defining Project features addressing the physical design of the Project as described below in *Section 4.4.6.1: Project Design Features*. Specific changes to the proposed Project include raising the height of the ATS guideway along Market Street to preserve existing views of historic buildings in downtown Inglewood, relocating the Prairie Avenue/Pincay Drive Station to the southwest corner of Manchester Boulevard and Prairie Avenue, redesign of the proposed MSF to allow this facility to be located on the proposed site with a new Vons store, and realignment of the guideway and stations on Prairie Avenue to the west side of Prairie Avenue. These changes to the Project reduced the impacts of the Project on historic resources. In addition, the information and analysis in the historic resources report was updated and expanded and a peer review of this report was performed. The updated historic resources report determined the revised Project will not result in any significant impacts to historic resources.

See **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Recirculated Draft EIR.

### 4.4.2 METHODOLOGY

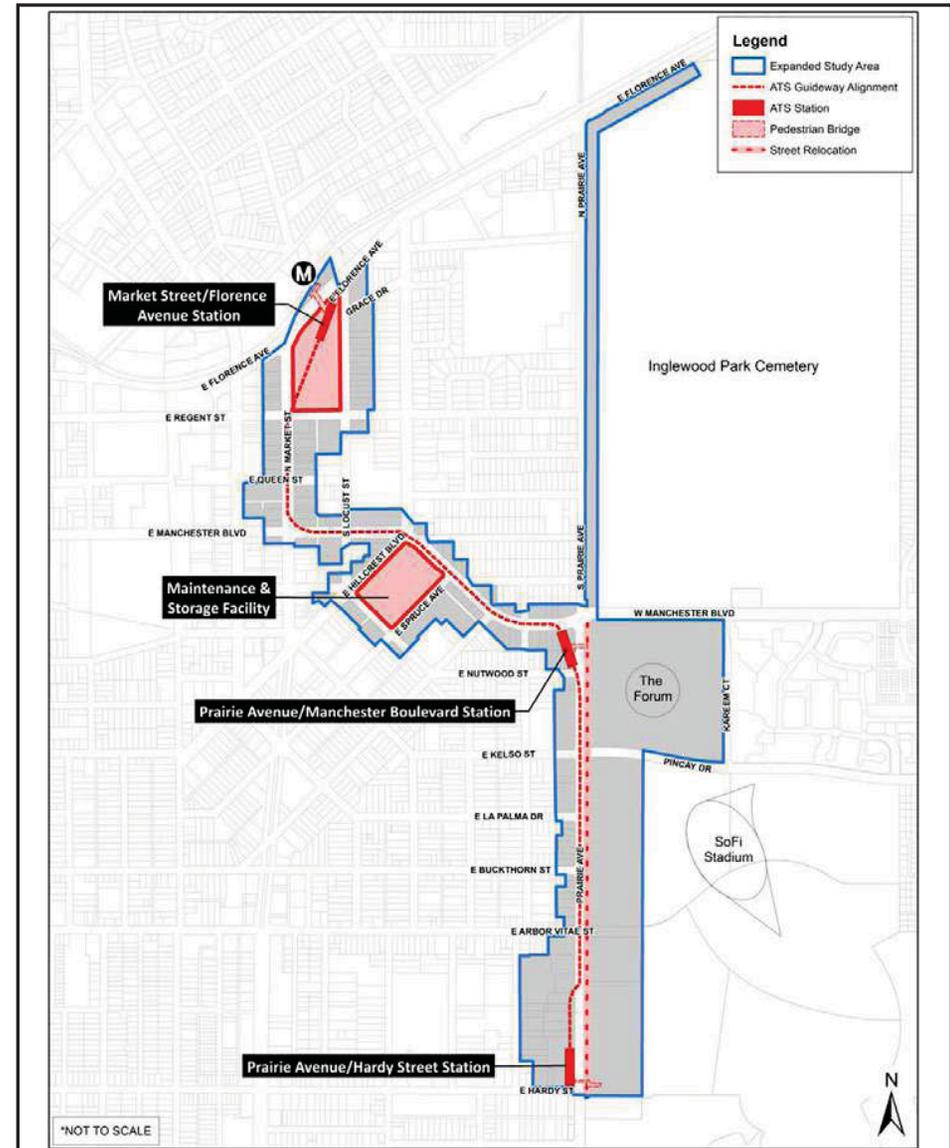
#### 4.4.2.1 Historic Architectural Resources

The analysis of impacts to historic architectural resources is based on the *Historic Preservation Memo (Appendix I.3)* and *Historic Resources Technical Report (Appendix I.2)* prepared by qualified personnel who meet or exceed the Secretary of the Interior's Professional Qualification Standards in history and architectural history.

**Figure 4.4-1: Historic Resource Study Area** identifies the Project Area and Expanded Study Area defined for purposes of the historic resource investigation. The Project Area includes all areas and parcels where new construction will occur. This includes the public rights-of-way along Market Street, Manchester Boulevard, and Prairie Avenue where the elevated ATS guideway will be constructed; the block bounded by Market Street, Florence Avenue, Locust Street, and Regent Street where the Market Street/Florence Avenue station would be constructed; parcels north of Florence Avenue where a pedestrian bridge from the Market Street/Florence Avenue station to the existing Metro K Line Downtown Inglewood station will land; the block bounded by Manchester Boulevard, Hillcrest Boulevard, Nutwood Street, and Spruce Avenue where the MSF and a PDS substation will be built; the parcel at the corner of southwest corner of Manchester Boulevard and Prairie Avenue where a station will be located; parcels at the northwest corner of Prairie Avenue and Hardy Street where a station and a PDS substation will be located; and parcels east of Prairie Avenue between Manchester and Hardy where the travel lanes will be relocated to the east.

The Expanded Study Area encompasses what is expected to be the maximum extent within which Project impacts will occur. The Expanded Study Area includes all parcels fronting the alignment right-of-way on both sides. In addition, where there will be substantial new construction outside of the alignment right-of-way, parcels immediately adjacent to or across from the new construction have been included in the Expanded Study Area. This includes parcels adjacent to or across from the block where the Market Street/Florence Avenue, Prairie Avenue/Manchester Boulevard, and Prairie Avenue/Hardy Street stations would be constructed; parcels adjacent to or across from the MSF site; and sites where the pedestrian bridges will land.

Where historical resources exist within the Project Area or Expanded Study Area, evaluation of the potential for the Project to result in an adverse change in the significance of identified historic resources was completed. Review of previous studies and reference materials on June 4, 2018, and February 21, 2019, were conducted to evaluate the eligibility of properties for listing in the National Register and the California Register. This investigation used primary and secondary sources related to the history and development of the City with an emphasis on the early 20th-century, central business district that comprises much of the Project footprint and Expanded Study Area.



SOURCE: Historic Resources Group, September 2021

FIGURE 4.4-1



251-004-21

## Historic Resource Study Area

Documents that were consulted included previous historical resources surveys and assessments; previous environmental reviews; the City's historical building permits; Los Angeles County Tax Assessor records; Sanborn Fire Insurance maps; historical photographs and aerial images; historical newspapers and other periodicals; local histories and historic context statements; and the California State Historic Resources Inventory, Los Angeles County.

The California State Historic Resources Inventory for Los Angeles County, records housed at the California Historic Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC), was consulted to identify any previous evaluations of potential historic resources on, or immediately adjacent to, the Project alignment.

Detailed field surveys of the Project Area and Expanded Study Area were conducted on June 4, 2018, February 21, 2019, and August 1, 2021. These field surveys were supplemented by property-specific and contextual research to identify additional properties that may be considered historical resources under CEQA.

#### 4.4.2.2 Archaeological Resources

A *Cultural Resource Investigation* (see **Appendix I.1**) was performed for the area for the proposed Project consisting of both desktop-level review and a field investigation. This investigation effort included the Project footprint and a half-mile radius beyond the footprint. The objective of this investigation was to identify prehistoric or historical cultural and archaeological resources that have been previously recorded within the study area during prior cultural resource investigations and through field investigation.

As part of the *Cultural Resource Investigation*, literature, and records searches were conducted at the SCCIC housed at California State University, Fullerton on June 20, 2018. The objective of this records search was to identify prehistoric or historical cultural resources that have been previously recorded within the study area during prior cultural resource investigations. The research component of the investigation was also used to describe the development history of the City and its surrounding area. Additional sources consulted during the literature review and records search included published local histories, previous environmental review documents for the City and region, the National Register of Historic Places, the Office of Historic Preservation Archaeological Determinations of Eligibility, and the Office of Historic Preservation Directory of Properties in the Historic Property Data File.

The *Cultural Resource Investigation* also included a windshield/reconnaissance field survey conducted by a qualified PaleoWest archaeologist on July 20, 2018. The purpose of the survey was to observe and note the conditions of the area, including the extent of the hardscape, the overall degree of ground disturbance, and the character and nature of the area. This included a survey along the length of the ATS alignment to

identify any areas of open ground surface and any areas likely to contain or exhibit archaeologically or historically sensitive cultural resources. Identified areas were inspected to ensure that if any visible, potentially significant archaeological resources were discovered that they were documented. The area of the proposed Project was recorded with digital photographs and a photo log was maintained to include, at a minimum, photo number, date, orientation, photo description, and comments.

As part of the *Cultural Resource Investigation*, the Native American Heritage Commission (NAHC) was contacted on June 15, 2018, for a review of the Sacred Lands File (SLF) in addition to five Native American individuals and/or tribal groups to elicit information regarding cultural resource issues related to the proposed Project. Detailed information describing the City's formal tribal consultation process and the proposed Project's potential impacts to tribal cultural resources are discussed in **Section 4.13: Tribal Cultural Resources** of this Recirculated Draft EIR.

#### 4.4.3 REGULATORY FRAMEWORK

Cultural historic resources are regulated at the Federal, State, and local levels of government. Federal laws establish broad frameworks for cultural historic resource identification and protection, while State and local jurisdictions actively identify, document, and protect resources within their boundaries. The National Historic Preservation Act of 1966,<sup>1</sup> the California Register, the California Public Resources Code (Sections 5020-5029.5,<sup>2</sup> 5079-5079.65,<sup>3</sup> and 5097.9-5097.998),<sup>4</sup> and the California Environmental Quality Act (CEQA) are the primary federal and State laws regulating the preservation of cultural historic resources of national and State significance.

##### 4.4.3.1 Federal Regulations

###### *National Historic Preservation Act*

The National Historic Preservation Act of 1966 (NHPA) authorized formation of the National Register and coordinates public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources. The National Register includes districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.<sup>5</sup>

Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to consider the effects of their undertakings on historic properties. A Section 106 review refers to the federal review process designed to ensure that historic properties are considered during federal project planning and

<sup>1</sup> US Code, Title 54, Section 300101 et seq., National Historic Preservation Act of 1966, Sections 106 and 110.

<sup>2</sup> California Public Resources Code (PRC), Sections 5020-5029.5, Historic Resources.

<sup>3</sup> California PRC, Sections, 5079-5079.65. Parks and Monuments.

<sup>4</sup> California PRC, Sections 5097.9-5097.998, Native American Historical, Cultural, and Sacred Sites.

<sup>5</sup> US Code, Title 54, Section 300101 et seq., National Historic Preservation Act of 1966, Sections 106 and 110.

implementation. The Advisory Council on Historic Preservation, an independent federal agency, administers the review process, with assistance from State Historic Preservation Offices (SHPOs). If any impacts are identified, the agency undergoing the project must identify the appropriate SHPO to consult with during the process.<sup>6</sup>

### **National Register of Historic Places**

The National Register of Historic Places (NRHP)<sup>7</sup> is the official list of the Nation's historic places worthy of preservation. Authorized by the National Historic Preservation Act of 1966, the National Park Service's (NPS) National Register of Historic Places is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archeological resources.

Section 106 of the NHPA requires federal agencies to consider the effects of an undertaking on historic properties, which are defined as cultural resources included in or eligible for listing in the National Register. Determination of National Register eligibility for cultural resources is made according to the following criteria:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and

- a. that are associated with events that have made a significant contribution to the broad patterns of our history; or
- b. that are associated with the lives of persons significant in our past; or
- c. that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- d. that have yielded, or may be likely to yield, information important in prehistory or history.<sup>8</sup>

If cultural resources do not meet the above criteria, they are not historic properties and are not further considered in the Section 106 process. In addition to having significance, resources must have integrity for the period of significance. The period of significance is the date or span of time within which significant events transpired or significant individuals made their important contributions.

<sup>6</sup> US Code, Title 54, Section 300101 et seq., National Historic Preservation Act of 1966, Section 106  
<sup>7</sup> U.S. Department of the Interior, National Park Service (NPS), *Nation Register of Historic Places*.  
<https://www.nps.gov/subjects/nationalregister/what-is-the-national-register.htm>  
<sup>8</sup> US Code, Title 54, Section 300101 et seq., National Historic Preservation Act of 1966, Section 106

### **Historic Districts**

The NPS defines a historic district as “a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.”<sup>9</sup> A historic district derives its significance as a single unified entity. According to the NPS:

*A district can comprise both features that lack individual distinction and individually distinctive features that serve as focal points. It may even be considered eligible if all of the components lack individual distinction, provided that the grouping achieves significance as a whole within its historic context. In either case, the majority of the components that add to the district's historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.*

Some examples of districts include business districts, college campuses, large estates, farms, industrial complexes, residential areas, and rural villages.<sup>10</sup> Properties that have been found to contribute to the historic significance of a district are referred to as district contributors. Properties located within the district boundaries that do not contribute to its significance are identified as non-contributors.

### **Secretary of the Interior's Standards**

The Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) are intended to promote responsible preservation practices that help protect irreplaceable cultural resources.<sup>11</sup> They cannot be used to make essential decisions about which features of the historic building should be saved and which should be changed. Choosing the appropriate treatment Standard, or approach, requires careful decision making and depends on a number of considerations, including level of historical significance, physical condition, proposed use, and code or regulatory requirements. Once the Standard is selected—whether it is preservation, rehabilitation, restoration, or reconstruction—the Standards provide philosophical consistency when treatment work is undertaken.

Rehabilitation, the most common treatment approach, is the process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values. The Standards for Rehabilitation are as follows:

<sup>9</sup> National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation. Washington D.C.: National Park Service, U.S. Department of Interior, 1995, 5.  
<sup>10</sup> National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation. Washington D.C.: National Park Service, U.S. Department of Interior, 1995, 5.  
<sup>11</sup> U.S. Department of the Interior, National Park Services, *Technical Preservation Services*, The Secretary of The Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings, 2017, accessed June 2018 at <https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf>.

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

#### 4.4.3.2 State Regulations

##### *Office of Historic Preservation*

The California Office of Historic Preservation (OHP) administers federally and State-mandated historic preservation programs to further the identification, evaluation, registration, and protection of California's irreplaceable resources.<sup>12</sup> As an office of the California Department of Parks and Recreation, the OHP implements the policies of the NHPA on a Statewide level. OHP works to preserve California's heritage

<sup>12</sup> State of California, Office of Historic Preservation. <https://ohp.parks.ca.gov/>.

resources by ensuring that projects and programs carried out or sponsored by federal, State, and local agencies comply with federal and State historic preservation laws.

##### *California Register of Historical Resources*

The State Historical Resources Commission has designed the California Register of Historic Places (California Register) for use by State and local agencies, private groups, and citizens to identify, evaluate, register, and protect California's historical resources. The California Register is the authoritative guide to the State's significant historical and archeological resources.<sup>13</sup>

The California Register program encourages public recognition and protection of resources of architectural, historical, archeological, and cultural significance, identifies historical resources for State and local planning purposes, determines eligibility for State historic preservation grant funding and affords certain protections under the California Environmental Quality Act.

The California Register is the authoritative guide to the State's significant archaeological and historical resources. It closely follows the eligibility criteria of the National Register but deals with State and local-level resources. The California Register serves to identify, evaluate, register, and protect California's historical resources. For purposes of CEQA, a historical resource is any building, site, structure, object, or historic district listed in or eligible for listing in the California Register.<sup>14</sup> A resource is considered eligible for listing in the California Register if it meets any of the following criteria:

- a. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- b. Is associated with the lives of persons important in our past.
- c. Embodies the distinctive characteristics of type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- d. Has yielded, or may be likely to yield, information important in prehistory or history [PRC Section 5024.1(c)].

Historical resources meeting one or more of the criteria listed above are eligible for listing in the California Register. In addition to significance, resources must have integrity for a period of significance—the date or span of time within which significant events transpired or significant individuals made important contributions. Important archaeological resources are required to be at least 50 years old to be considered. “Integrity is the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance.” Simply put, resources must

<sup>13</sup> State of California, Office of Historic Preservation, *California Register of Historic Places*, [https://ohp.parks.ca.gov/?page\\_id=21238](https://ohp.parks.ca.gov/?page_id=21238).

<sup>14</sup> California PRC, *Division 13. Environmental Quality*, Section 21084.1.

“retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance.”

CEQA also requires the lead agency to consider whether there is a significant effect on unique archaeological resources that are not eligible for listing in the California Register. As defined in CEQA, a unique archaeological resource is:

*an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:*

1. *Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.*
2. *Has a special and particular quality such as being the oldest of its type or the best available example of its type.*
3. *Is directly associated with a scientifically recognized important prehistoric or historic event or person.<sup>15</sup>*

If an archaeological resource is found eligible for listing in the California Register, then it is considered under CEQA to be a historic resource that needs to be protected. This may also apply to unique archaeological resources. If a historic resource may be impacted by activity, under CEQA, avoidance and preservation in place is the preferred alternative. If that is not possible, then a data recovery plan would need to be created and enacted to lessen impacts to the environment to a less-than-significant-level. If the archaeological resource is not eligible for listing in the California Register, and it is not a unique archaeological resource, then no further action is required to protect or mitigate possible impacts to it.

### **California Health and Safety Code**

The discovery of human remains is regulated per California Health and Safety Code,<sup>16</sup> which addresses dead bodies and requires the County Coroner to be notified in the event of the discovery of human remains. If the human remains discovered are determined to be Native American in origin, the Coroner will contact the Native American Heritage Commission (NAHC) within 24 hours.

<sup>15</sup> California PRC, *Division 13. Environmental Quality*, Section 21083.2.

<sup>16</sup> California, *Health and Safety Code* sec. 7050.5, “Dead Bodies.”

### **California Public Resources Code Sections 5020-5029.5 – Historical Resources**

The California Public Resources Code<sup>17</sup> addresses the protection of archaeological, paleontological, and historical sites. In addition, cultural and paleontological resources are recognized as a nonrenewable resource and, therefore, receive protection under the statute as follows:

- *California Public Resources Code* Sections 5020-5029.5 established the Historical Landmarks Advisory Committee as the State Historical Resources Commission (SHRC). The SHRC oversees the administration of the California Register of Historical Resources and is responsible for the designation of State Historical Landmarks and Historical Points of Interest.
- Defines the functions and duties of the OHP. OHP is responsible for the administration of federally and State mandated historic preservation programs in California and the California Heritage Fund.
- Provides protection to Native American historical and cultural resources and sacred sites and identifies the powers and duties of NAHC. These sections also require notification of discoveries of Native American human remains, descendants and provide for treatment and disposition of human remains and associated grave goods.

### **California Environmental Quality Act**

The State CEQA Guidelines<sup>18</sup> require that environmental protection be given significant consideration in the decision-making process. Historical resources are included under environmental protection. Thus, any project or action which constitutes a substantial adverse change in the significance of a historical resource also has a significant effect on the environment and shall comply with the State CEQA Guidelines.

CEQA clarifies which cultural resources are significant, as well as which project impacts are considered to be significantly adverse. A “substantial adverse change” means “demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired.”

CEQA defines a historical resource as a resource listed in, or determined eligible for listing, in the California Register of Historical Resources. All properties on the California Register are to be considered historic resources under CEQA. However, because a property does not appear on the California Register does not mean it is not significant and therefore exempt from CEQA consideration. All resources determined eligible for the California Register are also to be considered under CEQA.

<sup>17</sup> California PRC, Sections 5020-5029.5, *Historic Resources*.  
[https://leginfo.ca.gov/faces/codes\\_displayText.xhtml?lawCode=PRC&division=5.&title=&part=&chapter=1.&article=2](https://leginfo.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=5.&title=&part=&chapter=1.&article=2).

<sup>18</sup> State CEQA Guidelines, Section 15064.5. *Determining the Significance of Impacts to Archaeological and Historical Resources*.

The courts have interpreted CEQA to create three categories of historical resources:

- Mandatory historical resources are resources “listed in, or determined to be eligible for listing in, the California Register of Historical Resources.”
- Presumptive historical resources are resources “included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1 or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1” of the Public Resources Code, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant.
- Discretionary historical resources are those resources that are not listed but determined to be eligible under the criteria for the California Register of Historical Resources.<sup>19</sup>

To simplify the first three definitions provided in the CEQA statute, a historical resource is a resource that is:

- Listed in the California Register of Historical Resources;
- Determined eligible for the California Register by the State Historical Resources Commission; or
- Included in a local register of historical resources.

The CEQA Guidelines provide two additional definitions of historical resources, which may be simplified in the following manner. A historical resource is a resource that is:

- Identified as significant in a historical resource survey meeting the requirements of Public Resources Code 5024.1(g);
- Determined by a Lead Agency to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Generally, this category includes resources that meet the criteria for listing on the California Register (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852).

The fact that a resource is not listed in, or determined eligible for listing in, the California Register, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, does not preclude a lead agency from determining that the resource may be an “historical resource” for purposes of CEQA.

Properties formally determined eligible for listing in the National Register of Historic Places are automatically listed in the California Register. Properties designated by local municipalities can also be

<sup>19</sup> League for the Protection of Oakland’s Architectural and Historic Resources vs. City of Oakland, 52 Cal. App. 4th 896, 906-7 (1997).

considered historical resources. A review of properties that are potentially affected by a project for historic eligibility is also required under CEQA.

### **City of Inglewood General Plan**

The City’s General Plan Land Use Element presents a long-range plan for the distribution and future use of land within the City. The Land Use Element analyzes population, existing and future land use requirements, and proposed implementation techniques. It provides a framework upon which the development of public and privately owned land can be based.<sup>20</sup>

### **Land Use Element**

The City’s Land Use Element<sup>21</sup> was adopted in 1980 and subsequently amended in 1986, 2009, 2016, and 2020. Applicable goals to the Cultural Resources section were added in 2016 to the Land Use Element with the adoption of the New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines described below.

### **New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines**

The New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines<sup>22</sup> (Downtown TOD Plan) covers the Downtown Inglewood and Fairview Heights neighborhoods of the City and works to implement the City’s vision for transforming the quality of the environment within these areas. The Downtown TOD Plan area consists of approximately 585 acres located in the center of Inglewood along the Metro K line just east of the Florence Avenue/La Brea Avenue intersection. This Downtown planning and zoning area extends approximately one-half mile in all directions from the Metro Downtown Inglewood Station.

The Downtown TOD Plan planning goals were incorporated into the Land Use Element with its 2016 update. Relevant goals and policies in the Downtown TOD are listed as follows:

**Goal 1:** Downtown is a place to live, work, shop, recreate, and be entertained.

**Policy 1.2:** Ground Floor Uses and Storefronts. Require uses that activate pedestrian activity such as retail on major streets and plaza frontages. Require that

<sup>20</sup> City of Inglewood, *General Plan- Related Documents*, <https://www.cityofinglewood.org/209/General-Plan>. Accessed June 12, 2020.

<sup>21</sup> City of Inglewood, *Land Use Element*. <https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-PDF>. Accessed July 22, 2020.

<sup>22</sup> City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, November 1, 2016.

storefronts be historically-sensitive, attractive, and transparent in the Historic Downtown.

**Goal 2:** Downtown is a revitalized yet forward-looking gathering place for the community.

**Policy 2.3:** Preservation of Historic Fabric. Require the preservation of buildings that have been designated as historic and encourage the reuse of other historic buildings. Maintain the sense of place in areas with historic fabric and/or meaning such as Market Street between Regent Street and Hillcrest Avenue and the Hillcrest neighborhood east of Locust Street.

**Goal 6:** Downtown expresses the unique culture of Inglewood.

**Policy 6.1:** Districts. Define the following unique districts within the Downtown TOD area, each with their own unifying character or identity that should be preserved and enhanced: Historic Downtown, Civic Center, TechTown, Beach Avenue, Fairview West, Hillcrest and Queen Street.

Additionally, the Downtown TOD states that the Historic Downtown is the heart of Downtown Inglewood, characterizing it as pedestrian-oriented and human scaled neighborhood. The element further states that Downtown Inglewood is intended to function as a regional destination and gathering space for all in the City that links residents with the community's past, present, and future. The district should include public space, restaurants, entertainment, residential uses, hotel, and office uses.

### **City of Inglewood Municipal Code**

The City of Inglewood's General Plan does not identify any goals or policies related specifically to cultural or historical resources. Permitted uses in the Historic Core Zone are those identified in the Downtown TOD.<sup>23</sup>

## **4.4.4 EXISTING CONDITIONS**

### **4.4.4.1 Regional Ethnographic Setting**

#### **Pre-History**

In the pre-historical period, the fertile coastal plain between present-day Los Angeles and Long Beach was enriched by the periodic flooding of the Los Angeles River over millennia. It was home to the Tongva people, also referred as the Gabrieleño, Fernandño, or Nicoleño, the names given to the region's

<sup>23</sup> City of Inglewood, Municipal Code, Section 12-31.46 (Ord. 17-01 11-01-16).

indigenous people by California's Spanish missionaries. The Tongva occupied the area now encompassed by the Los Angeles basin, San Fernando Valley, San Gabriel Valley, San Bernardino Valley, and the local California coastline. The South Bay region was home to a number of small Tongva (Gabrieleño) villages, with notable settlements at Suangna near the present-day city of Carson, near Point Fermin in San Pedro, and near Malaga Cove in Palos Verdes.<sup>24</sup>

### **Spanish Colonial and Mexican Periods**

In 1542, Spanish explorer Juan Rodriguez Cabrillo led the first European expedition to explore what is now the west coast of North America. Explorers with Cabrillo's expedition encountered native people on land and sea voyages, making what is thought to be the first known contact with Alta California's indigenous tribes, including the Tongva of the Suangna area.<sup>25</sup> While Cabrillo claimed California for the Spanish Crown at this time, Spanish settlement would not reach this territory for another two hundred years.

On July 14, 1769, Don Gaspar de Portolá, governor and military leader of Baja California, led the first expedition to colonize Alta California. Accompanied by Franciscan friars Junípero Serra and Juan Crespi, Portolá took a group of 64 men northward from San Diego toward Monterey. On August 2, the expedition camped along the east bank of the Los Angeles River just south of where it is joined by the Arroyo Seco. Fr. Crespi named the spot "El Pueblo de Nuestra Señora la Reina de los Ángeles del Río Porciúncula (translating as "town of Our Lady the Queen of Angels of the River Porciúncula"). As the expedition crossed the river and continued to the south and west approximately one mile, they encountered the Tongva village of *Yang-na*, believed to be near the current site of *El Pueblo de Los Angeles*.

On September 8, 1771, Spanish colonists established Mission San Gabriel, the fourth of an eventual 21 Spanish missions in California, and the first in this area. Much of the area's native population would be recruited to work the San Gabriel Mission lands. Seven years later, in 1778, Governor Felipe de Neve received approval for the creation of a civil pueblo along the *Río la Porciúncula*. Persuaded by Crespi's earlier descriptions of a well-watered valley with good soils for growing crops and an ample native population to work the land, the Spanish colonial government ordered Governor Neve to establish a settlement at this location and name the new pueblo *La Reina de los Angeles* ("Queen of the Angels").

In 1821, Mexico won its independence from Spain and Alta California became a territory of the new Mexican Republic, marking an end to Spanish colonial rule in the region. The political and social control of the military and religious leadership began to shift toward the secular and private sector, and to native-born Californios. The new Mexican government sought to diminish the influence of Spain in the region, as the Spanish missions largely remained loyal to the Roman Catholic Church in Spain. At the same time,

<sup>24</sup> Sam Gnerre, "The Suangna Native American Village in Carson," South Bay Daily Breeze, January 17, 2015.

<sup>25</sup> Sam Gnerre, "The Suangna Native American Village in Carson," South Bay Daily Breeze, January 17, 2015.

there was a need for more grazing lands to increase commerce in the hide and tallow trade. Thus, beginning in 1834, the Mexican government began to secularize the missions, confiscating mission lands to be distributed in large land grants called “ranchos.” Pío Pico, the last governor of Alta California, subdivided the former mission lands into large tracts, granting them to various prominent “Californios.”

### American Period

United States troops began occupying Alta California in 1846, at the advent of the Mexican-American War, and soon gained possession of Los Angeles itself. However, Alta California would not officially come under American rule until February 2, 1848, with the signing of the Treaty of Guadalupe Hidalgo, which ceded the California territory to the United States and ended the war. Importantly, the treaty also provided that the existing land grants would be honored.

#### 4.4.4.2 History of Inglewood

The origin of today’s City of Inglewood dates back to the mid-1800s and a dispute between two prominent California families: the Ávilas and the Machados. José Manuel Orchado Machado was a Spanish soldier and mule tender who was sent west of Los Angeles in 1781 to graze his livestock. He found the area around the Centinela Springs to be excellent grazing lands and settled there with a group of ranchers.<sup>26</sup> In 1834, Machado’s son Ygnacio built the Centinela Adobe.<sup>27</sup> During this same period, Francisco Ávila and his family had established grazing lands near the Centinela. As the claims of the two families clashed, they took their dispute to the local council in 1837, which gave official title of the area around Centinela Springs to the Machado family as the 2,219-acre Rancho Aguaje de la Centinela. The Ávila family was granted the much larger Rancho Sausal Redondo. At 22,458 acres, this land encompassed much of what is now the South Bay region of Los Angeles County. In 1845, Bruno Ygnacio Ávila arranged a trade with the Machados: a small tract in the Pueblo de Los Angeles for Rancho Aguaje de la Centinela. The grant for Rancho Sausal Redondo was officially patented to Antonio Ygnacio Ávila in 1855; Rancho Aguaje de la Centinela was officially granted to Bruno Ávila in 1872.

Ultimately the Ávila family would lose both of the ranchos. Bruno Ávila lost Rancho Aguaje de la Centinela through foreclosure in 1857; the property was subsequently acquired by Scotsman Sir Robert Burnett in 1860. In 1868, the heirs of Antonio Ávila were forced to sell Rancho Sausal Redondo to pay probate costs, and Burnett acquired it. By 1872, Burnett combined the total area of some 25,000 acres into the Centinela Ranch, thus reuniting the extent of the original land grant. This ranch included what would ultimately

<sup>26</sup> The site of Centinela Springs is today’s Edward Vincent Junior Park, just northeast of the Project Area.

<sup>27</sup> The Centinela Adobe is located in the Los Angeles community of Westchester and is the oldest building in the area. Considered the “birthplace of Inglewood,” it is operated as a house museum by the Historical Society of Centinela Valley.

become the coastal communities of Playa del Rey, El Segundo, Manhattan Beach, Hermosa Beach, and Redondo Beach; as well as the inland communities of Westchester, Inglewood, Hawthorne, and Lawndale.

In 1873, Burnett returned to his native Scotland, leasing the combined rancho lands to Canadian attorney Daniel Freeman and his wife, Catherine, with an agreement that they could eventually purchase the property outright.<sup>28</sup> The Freeman family moved to the ranch, which Burnett had been using to graze sheep and cattle. Daniel Freeman continued to graze the stock, while also planting more than 10,000 fruit and nut trees. Following a drought that led to the death of some 22,000 of his sheep, Freeman turned to dry farming, eventually producing a million barrels of barley annually. Ultimately Freeman would amass a fortune farming barley, olives, citrus fruits, and almonds. He named his ranch “Inglewood,” after his birthplace in Ontario.

Following Catherine’s death, Daniel Freeman began to pursue the commercial development of his expansive holdings. He first established the Centinela Land Company, which proved unsuccessful. Then in 1887, as the California Central Railway laid tracks to Redondo Beach, Freeman sold some 11,000 acres of his ranch to the Centinela-Inglewood Land Company, which would subdivide the extent into small parcels for the settlement of the new town of Inglewood. The parcels sold quickly and attracted crowds traveling in from far and wide to make land purchases.

In 1888, Freeman began work on a large mansion for himself and his family, with bricks provided by his own newly-established Continuous Brick Kiln Company of Inglewood, and lumber from the recently-acquired local planning mill.<sup>29</sup> In 1889, he built the Land Company office next to the train depot, moving it to the grounds of his estate in 1895 where it served as his office until his death in 1918.<sup>30</sup> Ultimately, all 25,000 acres of the Centinela Ranch would be subdivided and developed, with the only remaining portion of the ranch being the one-acre site on which the Centinela Adobe is situated.

<sup>28</sup> The Freeman family officially acquired this land from Burnett in 1885.

<sup>29</sup> Gladys Waddingham, *The History of Inglewood (Inglewood, CA: Historical Society of Centinela Valley, 1994)*, 8.

<sup>30</sup> Gladys Waddingham, *The History of Inglewood (Inglewood, CA: Historical Society of Centinela Valley, 1994)*, 11. Daniel Freeman is considered the founder of the City of Inglewood. Among his various pursuits, he is said to have been the first farmer to engage extensively in wheat cultivation in Southern California. Upon discovering a deposit of brick clay on his property, he established the Continuous Brick Kiln Company of Inglewood in 1888, manufacturing the building materials for many of the business blocks on Spring Street and Broadway in downtown Los Angeles, including his own building, the Freeman Block at 6th and Spring streets. He was the first president of the California Club of Los Angeles, president of the Los Angeles Chamber of Commerce in 1893-1894, and director of the Southern California Railway Co. Freeman lived in the Centinela Adobe before erecting his own residence in beginning in 1891, which was demolished 1972 to make way for the Daniel Freeman Memorial Hospital (now closed). In 1975, the Land Company office was moved from his estate to the grounds of the Centinela Adobe, where it now stands.

### ***Inglewood Townsite***

The townsite of Inglewood was platted by the Centinela-Inglewood Land Company in 1888, by which time the town already had a population of 300.<sup>31</sup> The plan divided the town into northern and southern sections on either side of the newly completed Inglewood Division of the California Central Railroad line, a subsidiary of the Atchison Topeka & Santa Fe Railway, which ran along Florence Boulevard as it made its way from Los Angeles to Redondo Beach. The major north-south street leading into Inglewood was Grevillea Avenue. Development during this period was sparse, and most buildings were of impermanent wood-frame construction. The first few business buildings clustered on narrow uniform lots along Grevillea Avenue and Commercial Street (now La Brea Avenue) between Regent and Queen streets.

By 1892, the town of Inglewood was home to several small businesses, including a grocery, post office, a barber, a restaurant, and a large two-story hotel on Queen Street between Commercial and Market.<sup>32</sup> At this time, Inglewood also had a post office, a railroad depot, and a large grain storage building situated along the Redondo Branch of the AT&SF railroad, as well as a handful of single-family residences. Market Street was predominantly residential during this period, before the opening of a streetcar line along its length in 1904, which would lead to its gradual transition to a commercial corridor.

By 1907, downtown Inglewood had several dozen dwellings. Commercial establishments included a drug store, general merchandise store, grocery, meat market, tailor, print shop, and various lodging buildings and offices. Institutional properties included a public school and a Presbyterian church. Industrial uses were clustered along the rail lines and included a greenhouse, planning mill, lumber yard, cement storage, gain mills and storage, and several warehouses.<sup>33</sup> The City of Inglewood was officially incorporated on February 14, 1908.

Also, by this time, Inglewood was home to an expansive cemetery. In 1905, a group of local businessmen formed the Inglewood Park Cemetery Association, acquiring a large plot of land just east of what would become downtown Inglewood. A total of 32 internments took place in the cemetery's first year of operation, with funerals often arriving by rail from Los Angeles in a private funeral car.<sup>34</sup> In 1907, the cemetery erected the Romanesque-style Grace Chapel, a three-quarters replica of a church in Edinburgh, Scotland. Within a decade, the cemetery would erect the Neoclassical-style Inglewood Mausoleum, the first community mausoleum in the State of California.<sup>35</sup> Many of the South Bay region's earliest settlers

<sup>31</sup> Gladys Waddingham, *The History of Inglewood (Inglewood, CA: Historical Society of Centinela Valley, 1994)*, 6.

<sup>32</sup> Sanborn Fire Insurance Maps, Inglewood CA, 1892. The Inglewood Hotel is labeled on this map as "not open" and occupied by four families as a dwelling.

<sup>33</sup> Sanborn Fire Insurance Maps, Inglewood CA, 1907.

<sup>34</sup> Portions of the original railroad waiting station have been incorporated into the main entrance.

<sup>35</sup> The Inglewood Mausoleum was erected over the course of three years, from 1913 to 1915.

have been laid to rest at Inglewood Park Cemetery, including a number of Civil War veterans.<sup>36</sup> Other notable residents include former Los Angeles Mayor Tom Bradley, Chet Baker, Ray Charles, Ella Fitzgerald, Etta James, boxer Sugar Ray Robinson, and architect Paul Williams.<sup>37</sup>

By 1912, Inglewood's commercial core was beginning to take shape along Commercial Street between Los Angeles Street/Inglewood Avenue (now Florence Avenue) and Queen Street. Deep, narrow lots were being developed with various commercial uses, from restaurants and boarding houses to plumbers and hardware stores. Market Street remained primarily residential during this period, with a few commercial buildings, including a jeweler, a milliner, a confectioner, an undertaker, a bank, and a Methodist church.<sup>38</sup>

By 1920, the South Bay's local economy was booming due to the region's fertile agricultural lands, productive oil fields, and emerging aviation industry. The City of Inglewood was growing exponentially, as hundreds of new homes were being built. At the same time, the city's commercial development was coalescing into a downtown business district. Commercial Street between Regent and Queen streets was now solidly commercial, boasting many of the business enterprises needed by any growing town, from banks and automobile showrooms to furniture stores and a movie theater. South of Queen, Commercial Street was still largely undeveloped but for a few single-family residences and an apartment house. At this point, Market Street was more sparsely developed overall and displayed a combination of commercial and residential uses.<sup>39</sup>

The commercial structures erected in downtown Inglewood at this time were typical of those being built in downtowns throughout Southern California. These were what have since been termed "taxpayer blocks," speculative investments to generate tax benefit until more valuable development could be carried out. Early examples were multiunit two-story buildings, frequently with retail units on the ground floor and offices or apartments above. These buildings were typically unreinforced brick in construction, with applied ornament of cast stone or terra cotta at the entrance or along the parapet. Depending on the size of the building, it may contain one or more retail storefronts, with flexible interiors to accommodate the ever-changing needs of individual tenants. While many of these buildings were vernacular in design, in Southern California they were often overlaid with details of the Spanish Colonial Revival style, including tile roofs or parapet edges, arched doors and window openings, and decorative wall tile and cast-stone

<sup>36</sup> Inglewood Park Cemetery, <http://www.inglewoodparkcemetery.com/heritage.html> (accessed February 2019).

<sup>37</sup> Mike Sonksen, "On Location: Inglewood," KCET: History and Society, <https://www.kcet.org/history-society/on-location-inglewood> (accessed February 2019).

<sup>38</sup> Sanborn Fire Insurance Maps, Inglewood CA, 1912.

<sup>39</sup> Sanborn Fire Insurance Maps, Inglewood CA, 1923.

detailing. With the advent of the personal automobile, a single-story version of the form became popular, with surface parking behind.<sup>40</sup>

Inglewood also had a number of churches by this time, including the First Methodist Episcopal Church, St. John's Catholic Church, Church of the Brethren, and Christian Church.<sup>41</sup> The only church that survives from this period is Holy Faith Episcopal Church, located at the southeast corner of Locust Street and Grace Avenue.<sup>42</sup> The church was first established in 1911, with services held in the Inglewood Masonic Hall. In 1912, Grace Freeman Howland<sup>43</sup> and her husband Charles donated the funds to erect a religious complex consisting of a church, a rectory (the dwelling to the south), and parish hall (now a school at the rear). They hired a young architect, Philip Frohman, to design what would be hailed as "the most perfect example of true Gothic architecture in the West." Frohman would go on to become nationally renowned, particularly for his work on the National Cathedral in Washington, D.C. The church was officially consecrated on November 8, 1914, and dedicated to Catherine Freeman and Mathilda Howland, the mothers of Grace and Charles. The church lost its original bell tower in the 1933 Long Beach Earthquake, but soon thereafter gained the Stations of the Cross, imported from Italy; the pulpit, lectern, and choir stalls from England; and the reredos carved and imported from Bavaria. The stained-glass windows were crafted by Judson Studios in Highland Park.<sup>44</sup>

On the evening of June 21, 1920, the Los Angeles Basin was rattled by an estimated 5.0 earthquake centered near Inglewood. While tremors were felt as far away as Ventura and Riverside, almost all of the damage took place in Inglewood, and specifically to the unreinforced brick buildings along Commercial Street (now La Brea Avenue), where exterior walls fell into the street and plate glass windows shattered.<sup>45</sup> The Inglewood Hotel was also badly damaged and subsequently demolished. The City recovered quickly however, and the population grew from 3,286 according to the 1920 census to double of that number in two years.<sup>46</sup>

The 1920s was a boom period for the City, both in terms of population and development. While Commercial Street continued to be the primary artery of the downtown business district, many more

40 Lauren Weiss Bricker, Marion Mitchell-Wilson, and Janet L. Tearnen, Inglewood Downtown District Main Street Project Area, Historic Design Guidelines, report (Inglewood, CA: Main Street Inglewood, 2000), 9-10.

41 Lauren Weiss Bricker, Marion Mitchell-Wilson, and Janet L. Tearnen, Inglewood Downtown District Main Street Project Area, Historic Design Guidelines, report (Inglewood, CA: Main Street Inglewood, 2000), 9.

42 Holy Faith Episcopal Church is located at 260 N. Locust Street.

43 Grace Freeman was the daughter of Daniel Freeman, considered the founder of the City of Inglewood.

44 "Holy Faith Episcopal Church: One Hundred Years of Ministry," Holy Faith Episcopal Church, <https://www.holyfaithla.org/> (accessed February 2019).

45 Paul R. Spitzzeri, "Shake, Rattle and Roll: The Inglewood Earthquake of 21 June 1920," *Homestead Museum*, <https://homesteadmuseum.wordpress.com/2018/06/21/shake-rattle-and-roll-the-inglewood-earthquake-of-21-june-1920/> (accessed February 2019).

46 Gladys Waddingham, *The History of Inglewood (Inglewood, CA: Historical Society of Centinela Valley, 1994)*, 26.

businesses were being established on Market Street and its cross-streets during this period. At least seven new buildings were constructed in the 100 block of North Market Street alone. The local financial institution the People's Federal Building & Loan Association was established at this time, first in a unit of the building at 314 S. Market Street, before constructed their own building at the northeast corner of Market Street and Pimiento Street (now Manchester Boulevard) in 1927.<sup>47</sup> That same year, the Bank of Inglewood erected a two-story mixed-use building at the northeast corner of Market and Queen streets, at a cost of \$140,000. Designed by local architect William L. Campbell in the Mediterranean Revival style, the reinforced concrete building was touted as the "first steel frame business block in this city" and as "practically fire and earthquake proof."<sup>48</sup>

On May 18, 1927, some 15,000 locals came out to celebrate the "Festival of Light," which marked the opening of a new ornamental lighting system installed along Market Street. In addition to providing much needed illumination, the standards also supported the trolley wires of the Los Angeles Railway, allowing for the removal of the wooden poles from the middle of the street and the sidewalk.<sup>49</sup> In 1928, a two-story mixed-use structure called the Professional Building was constructed at Market Street and Manchester Boulevard's northwest corner. The building was designed in the Spanish Colonial Revival style with Churrigueresque details.<sup>50</sup> Also constructed in downtown Inglewood during this period were a new City Hall building (1923, demolished), the Granada Theater (1923, demolished), an S.H. Kress Variety Store (1927), and a United Artists Theater (1931, demolished), as well as a number of auto-related businesses such as gas stations and repair garages.

Toward the end of the 1930s, Inglewood's economic base began to expand outside the downtown core. In 1937, the City of Los Angeles purchased the Mines Field just southwest of the City to serve as its municipal airport, bringing many new jobs to the region. In 1938, the Hollywood Park, an "ultra-modern" thoroughbred racetrack, opened on 314 acres just southeast of downtown, effectively making Inglewood a destination for the first time.<sup>51</sup> In addition to attracting the typical racing fan, Hollywood Park brought in celebrated personalities associated with the entertainment industry from studio executives Jack Warner, Walt Disney, and Samuel Goldwyn to A-list actors like Al Jolson and Bing Crosby, of whom were also investors in the operation.

47 The former People's Federal Building & Loan Association building is located at 150 S. Market Street. It is currently occupied by the World Hat & Boot Mart.

48 "Two-Story Business Structure: Work for Inglewood Bank Let," Los Angeles Times, May 15, 1927. The former Bank of Inglewood building is located at 100 N. Market Street/307 E. Queen Street.

49 "Inglewood Glows Under New Lights," Los Angeles Times, May 20, 1927.

50 The Professional Building is located at 149-155 S. Market Street/231-239 E. Manchester Boulevard.

51 Bricker, 15.

### **Wartime and Postwar Growth**

As the likelihood of war increased in the early 1940s, a number of aviation-related and other wartime manufacturing facilities set up shop around the Los Angeles Airport. North American Aviation, Inc., and the Northrup Company both established airplane manufacturing plants in the vicinity. Due to the emergence of these new facilities, this area would not only be important to the defense industry during World War II, but in the postwar years would evolve into a center of the nation's aerospace industry.

The presence of wartime and postwar manufacturing jobs added to the local population and financially supported a growing middle class throughout the South Bay region, including in Inglewood. In 1938, the City had a population of 26,000; by 1956, that number had grown to 64,000.<sup>52</sup> Housing construction responded to the increased demand, and commercial development followed, leading to a pattern of postwar decentralization. By the mid-1950s, the City had three retail business areas – in North Inglewood, Morningside Park, and Crenshaw – in addition to the downtown.

Despite this overall growth, new development in downtown Inglewood was limited during this period. In 1941 a J.C. Penney department store opened on Market Street between Queen Street and Manchester Boulevard. Originally constructed as a one-story building, in 1954 it was expanded with a second story and remodeled in its exiting Mid-Century Modern style, with a deep front canopy and glazed terra cotta tile columns.<sup>53</sup>

The Fox Theater opened on March 31, 1949, on Market Street between Regent and Queen streets. Erected on the site of the Granada Theater, which burned down in 1945, it was the last theater constructed by the Fox West Coast Theater chain. Designed by theater architect S. Charles Lee in the Late Modern style, it was the first theater in Inglewood to have air conditioning. Other features included automatic lobby doors, CinemaScope widescreen projections, assistance for the hearing impaired, and a soundproof “crying room.” The Fox Inglewood was often used for Fox Pictures’ premiers and sneak previews.<sup>54</sup>

During this same period, two noteworthy institutions opened near downtown Inglewood. In 1948, Bank of America erected a 22,000-SF branch at the southwest corner of Manchester Boulevard and Locust Street.<sup>55</sup> That same year, funeral director John Flanagan opened Hardin & Flanagan Colonial Chapel &

<sup>52</sup> Bricker, 15.

<sup>53</sup> The former J.C. Penney building is located at 129-139 S. Market Street.

<sup>54</sup> “Inglewood Fox Theatre,” Los Angeles Historic Theatre Foundation, <http://www.lahtf.org/inglewoodfox/> (accessed February 2019); “Fox Theater,” Inglewood Public Art, [http://www.inglewoodpublicart.org/Fox\\_Theater.html](http://www.inglewoodpublicart.org/Fox_Theater.html) (accessed February 2019). The former Fox Theater is located at 115 N. Market Street.

<sup>55</sup> The Bank of America building is located at 320-330 E. Manchester Boulevard.

Mortuary on Prairie Avenue at La Palma Drive, across the street from Hollywood Park. Flanagan built a number of mortuaries around the Los Angeles area using the same American Colonial Revival design.

In 1959, the business was purchased by the McCormick family and renamed McCormick Mortuary.<sup>56</sup> The following year, the building was expanded with a two-story north wing, adding a new lobby with offices above. Today, the business is operated as Lighthouse McCormick Mortuary.<sup>57</sup> The other area for new development during the postwar period was La Brea Avenue, a wide auto corridor which previously served as the western border of downtown Inglewood.<sup>58</sup>

Despite these examples of new construction in and around downtown during this period, the primacy of the City's downtown as a commercial district was substantially diminished by increased competition from outlying commercial areas. The removal of the Market Street trolley line in 1957 added further stress to already struggling businesses. The City responded by adding municipally owned off-street parking lots located throughout the district to draw car-dependent shoppers. The Chamber of Commerce and Downtown Inglewood Retail Merchants Association coordinated to organize various promotional activities, as well as physical improvements like tree planting in the center strip and along sidewalks, which were in place by the early 1960s.<sup>59</sup> However, these effects of these efforts were soon eclipsed by the continued loss of customers to new shopping malls in communities throughout Los Angeles. Inglewood considered, but ultimately rejected, plans to build a mall of its own on a large parcel at Prairie Avenue and Manchester Boulevard, a proposal largely defeated by the Market Street merchants. The site would instead become the home of the Forum.<sup>60</sup>

By the late 1960s, downtown Inglewood needed reinvention. To this end, the City contemplated a wholesale redevelopment scheme for the Market Street corridor that would expand and remodel existing stores, construct two high-rise office and apartment towers, introduce a landscaped arcade, and build a four-square block parking deck above shops to quadruple parking capacity.<sup>61</sup> However, this plan would go unrealized. The United Bank of California at the southeast corner of Market and Regent streets would be the first new structure to be added to the Market Street corridor in nearly two decades, replacing several early 20th-century commercial buildings.<sup>62</sup> Constructed in 1967 in the Late Modern style, it was joined nine years later by a stand-alone drive-thru automated teller building situated across Regent Street from

<sup>56</sup> The McCormick family operated various locations throughout the South Bay, including Westchester, Hawthorne, Redondo Beach, Manhattan Beach, Gardena, and Whittier.

<sup>57</sup> The Lighthouse McCormick Mortuary is located at 619-635 S. Prairie Avenue.

<sup>58</sup> Also built during this period was a Sears department store at Manchester and Hillcrest boulevards. Opened in 1947, this was an early indicator that the future of retail in Inglewood would not be downtown. Sears was demolished in 1993 and replaced by a Vons supermarket.

<sup>59</sup> “Downtown Center of Many Activities,” Los Angeles Times, March 18, 1962.

<sup>60</sup> “The Changing Face of South Bay: Downtowns,” Los Angeles Times, January 4, 1987.

<sup>61</sup> “\$11 Million Center Assured in Inglewood,” Los Angeles Times, March 31, 1968.

<sup>62</sup> The former United Bank of California is located at 158-170 N. Market Street.

the bank. Both buildings are believed to have been designed by Los Angeles modernist architect Richard Dorman.<sup>63</sup>

### **Beyond Downtown**

In the late 1960s, nationally prominent businessman Jack Kent Cooke selected the site of a former golf course at the southeast corner of Prairie Avenue and Manchester Boulevard to erect a new venue for his three professional sports franchises – the Los Angeles Lakers NBA basketball team, the Los Angeles Kings NHL hockey team, and the short-lived Los Angeles Wolves professional soccer team. The Forum, a multipurpose indoor arena, was designed by the prominent Los Angeles architectural firm Charles Luckman & Associates and completed in 1967.<sup>64</sup> Designed in the New Formalist architectural style, it was intended as a modern and highly-stylized version of the Coliseum of ancient Rome. Nicknamed “the Fabulous Forum,” it would host tennis matches, boxing matches, ice shows, rodeos, the circus, award shows, and political events. In 1972, the Forum was the site of the Lakers’ first NBA championship since moving to Los Angeles; five additional titles would follow in the 1980s. From the mid-1970s through the 1990s, the Forum would serve as the premier large-scale concert venue for the Los Angeles area and would be influential in the birth of “arena rock.” During the 1984 Olympics, the Forum was the venue for men’s and women’s basketball.<sup>65</sup>

By the early 1970s, Market Street had been neglected as shoppers abandoned the downtown business center for suburban malls, and key tenants like J.C. Penney closed their doors. In an effort to reinvigorate the core of the City, from 1971 to 1976 Inglewood spent about \$50 million in local, County, and federal funds to erect a new civic center complex along La Brea Avenue, just one block west of downtown. This new complex combined City Hall, a courthouse, library, fire and police facilities, public health complex, and a major new parking garage onto a single super-block, surrounded by expanses of lawn and public art. As hoped, this new construction sparked a flurry of new commercial development in the larger In-Town Redevelopment Area<sup>66</sup>—bounded by Florence, Locust, Manchester, and Fir—the vast majority of which was office space and not retail. Several residential projects were built at this time as well, most notably the 200-unit Inglewood Meadows housing complex on Locust Street, just east of downtown.<sup>67</sup>

While these projects brought large numbers of people into the vicinity of Market Street, their presence did not raise the corridor’s fortunes, and the vitality of the downtown business district continued to wain

<sup>63</sup> Although an original building permit for the 1967 bank building is not available from the City of Inglewood, the permit for the similarly-styled drive-thru automated teller building lists Richard Dorman as its architect.

<sup>64</sup> The Forum is located at 3900 W. Manchester Boulevard.

<sup>65</sup> “Forum,” National Register of Historic Places Form. Prepared by Historic Resources Group, April 29, 2014.

<sup>66</sup> The In-Town Redevelopment Area was one of six redevelopment project areas adopted by the Inglewood Redevelopment Agency between 1970 and 1973.

<sup>67</sup> Dean Murphy and Michele L. Norris, “Government Money Becomes Urban Lifeblood: Innovation and Optimism Thrive on Public Funds in Inglewood, San Pedro,” Los Angeles Times, January 4, 1987.

into the 1980s. In October 1986, Market Street merchants brought downtown business activity to a halt as they closed their shops and picketed in a City-owned parking lot in a final effort to save it from redevelopment. The parking lot at La Brea Avenue and Queen Street provided 80 metered parking spaces which local shopkeepers saw as critical to continued viability of the downtown business district, which was already suffering from a parking shortage. Ultimately, however, the protests were unsuccessful, and the parking lot was soon replaced by a five-story office building.<sup>68</sup> Yet another sign of downtown’s economic decline, the Fox Theater, then owned by the Mann theater chain, closed its doors in 1988.

Since the late-1970s, at least four City-sponsored revitalization programs have focused on improving Market Street’s commercial viability, introducing street landscaping and furniture as well as façade improvements to the existing buildings. Efforts have included a façade improvement program designed by architectural firm Kahn, Kappe, Lotery, Boccato (1979); a \$250,000 façade improvement program, including signs and awnings (1984); a California Main Street Community Project (1990s); and the Market Street Renaissance program (2000). However, despite these efforts, Market Street has largely remained an underutilized asset.

### **Present Day Inglewood**

In 1994, Hollywood Park underwent a \$100 million expansion into Hollywood Park Casino, which extended the facility’s economic viability. However, in May of 2013, it was announced that the Hollywood Park racetrack would be closing at the end of the fall racing season. In 2015, the Inglewood City Council approved a plan to build an 70,000-seat football stadium on the site in anticipation of the St. Louis Rams moving back to Los Angeles.

The Forum remained the home of the Lakers and Kings until 1999, when both teams relocated to the newly constructed Staples Center in downtown Los Angeles. Beginning in 2012, the Forum underwent a \$50 million renovation, reopening in 2014. Later that year, the Forum was listed in the National Register. The venue is inextricably tied to the identity of the City, which adopted the moniker “City of Champions.” The Forum is slated to host the gymnastics events for the 2028 Summer Olympics.

Over the past decade, the City of Inglewood has been acquiring select parcels throughout the City for redevelopment, including along Market Street. Various planning studies have been conducted to develop standards for transit-oriented development, mixed-use development, and parking, with the goal of revitalizing downtown Inglewood. Local advocacy organization the Inglewood Historic Preservation Alliance (IHPA, formerly the Inglewood Historic Site Preservation Committee) continues to work toward the protection of the City’s historic structures and places of interest, including the Fox Theater, which was

<sup>68</sup> “Merchants Protest Proposal to Build on Parking Lot,” Los Angeles Times, October 16, 1986.

successfully listed in the National Register in 2013.<sup>69</sup> Currently, the City is utilizing The New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines, adopted November 1, 2016, as the controlling document for future development activity along Market Street and downtown Inglewood.

On January 12, 2016, the National Football League (NFL) voted to move the St. Louis Rams back to Los Angeles, with the San Diego Chargers to follow. In October 2016, the last part of the former racetrack, the Casino, was demolished, and a new Hollywood Park Casino was opened next door. Construction of the new SoFi Stadium was completed in July 2020 and is the new home of the NFL Los Angeles Rams and Los Angeles Chargers. The SoFi Stadium is slated to host Super Bowl LVI in 2022, the College Football National Championship in 2023, and the opening and closing ceremonies and soccer events for the 2028 Summer Olympics. Construction at the adjacent Hollywood Park Specific Plan development area is ongoing. In September 2020, the City of Inglewood approved the Inglewood Basketball and Entertainment Center (IBEC).

#### 4.4.4.3 Historic Setting

The proposed Project is located entirely within the City and would connect downtown Inglewood near the Metro K Line to the City's major activity centers, including the Forum, the Los Angeles Stadium and Entertainment District (LASED) at Hollywood Park and the Inglewood Basketball and Entertainment Center (IBEC).

Beginning on Market Street and Locust Street, land uses bordering the proposed ATS system include a commercial shopping center with surface parking, single-family and multi-family residences, and vacant land. These land uses transition to one- and two-story mixed-use commercial development further south on Market Street, including the former Fox Theater, with little to no front or side setbacks. Shifting east on Manchester Boulevard, the ATS system would similarly be bordered by one- and two-story mixed-use commercial/office development with little to no front or side setbacks. Proceeding further east on Manchester Boulevard, adjacent buildings include a strip mall and commercial shopping center with surface parking. Continued one- and two-story commercial and mixed-use development, surface parking, and limited areas of single- and multifamily uses round out the remainder of Manchester Boulevard. Surrounding the proposed MSF site along Manchester Boulevard are one-story commercial development to the northwest, five-story office, and one-story educational uses to the southwest, and two-story multifamily uses to the southeast.

<sup>69</sup> Anne Check La Rose, "Inglewood Fox Theatre: Bringing Back the Inglewood Fox Theatre," *Los Angeles Historic Theatre Foundation*, <http://www.lahtf.org/inglewoodfox/> (accessed February 2019).

At the intersection of Manchester Boulevard and Prairie Avenue, the Inglewood Park Cemetery is located to the northeast. Turning south on Prairie Avenue until Century Boulevard, the ATS system would primarily be bordered by one- and two-story mixed-use commercial, office, and multifamily development to the west, with substantial portions of single-family residences and surface parking intermixed. Kelso Elementary School and the Lighthouse McCormick Mortuary building are also located along the western side of Prairie Avenue. To the east of Prairie Avenue are major commercial and recreation venues such as the Forum, which is surrounded by surface parking, and the SoFi stadium, entertainment, retail, and residential uses under construction as part of the LASED at Hollywood Park.

#### 4.4.4.4 Cultural and Historical Resources

##### *Archaeological Resources*

The cultural resource records search and field visit conducted in support of the *Cultural Resource Investigation* (see **Appendix I.1**) did not result in identifying any prehistoric or historical archaeological resources within the Project study area.<sup>70</sup> The *Cultural Resource Investigation* states that the highly developed status of the Project area limits ground visibility and the ability to assess surface conditions for cultural resources. Further, the built nature of the area indicates a high degree of disturbance suggesting the likelihood of encountering intact archaeological deposits near the surface of the Project area to be very low.

##### *Historical Resources*

##### **Listed Historic Resources**

There are two properties along the proposed Project alignment that are listed in the National Register and are, therefore, automatically listed in the California Register. Accordingly, these properties are considered historic resources as defined by CEQA. These resources consist of the following:

**3900 W. Manchester Boulevard (The Forum).** This property, located at the southeastern corner of Manchester Boulevard and Prairie Avenue, contains the Forum, a multipurpose indoor arena, surrounded by an expansive surface parking lot. It was built by nationally prominent businessman Jack Kent Cooke as a venue for his three professional sports franchises, the Los Angeles Lakers NBA basketball team, the Los Angeles Kings NHL hockey team, and the short-lived Los Angeles Wolves professional soccer team. Completed in 1967, it was designed by prominent Los Angeles architectural firm Charles Luckman & Associates in the New Formalist style. From 2012 to 2014, it underwent an extensive historic renovation.

<sup>70</sup> See **Appendix I.1** of this Recirculated Draft EIR.

The Forum was listed in the National Register on September 24, 2014, under Criterion C as an excellent example of a 1960s New Formalist-style arena building.

**115 N. Market Street (former Fox Theater).** This property, located on the western side of Market Street between Regent and Queen streets, contains a 12,090-SF-neighborhood movie theater building. Originally constructed in 1949 for Fox West Coast Theaters, it was designed by prolific theater architect S. Charles Lee in the Late Modern style. The building is currently unoccupied and its storefront windows and doors are boarded up. The Fox Theater was listed in the National Register on January 14, 2013.

#### Previous Historic Resources Study

An investigation to inform the preparation of the “Inglewood Downtown District, Main Street Project Area, Historic Design Guidelines” prepared for the City of Inglewood in May 2000 included an effort to identify historic resources. The 2000 Historic Design Guidelines document included an investigation of historic resources located in the Inglewood Downtown District/Main Street project area, which was bounded by La Brea Avenue to the west, Locust Street to the east, Florence Avenue to the north, and Hillcrest Boulevard to the south. The upper portion of the Downtown District/Main Street area includes the Market Street portion of the Project Area and Expanded Study Area.

The 2000 Historic Design Guidelines investigation does not meet the requirements in Public Resources Code 5024.1(g) for historic resource surveys. This investigation did not include an intensive-level historic resources survey. Instead, preparation of the Historic Design Guidelines was limited to a reconnaissance-level survey only; properties were not fully evaluated or documented on inventory forms. These preliminary evaluations were summarized and entered into a database. Several properties were identified as eligible for local listing only, but the City of Inglewood does not have a local landmark designation program with codified eligibility standards and criteria for local listing. For these reasons, as well as the fact that it is now over 20 years old, the 2000 Historic Design Guidelines investigation is not considered an authoritative or definitive source for this report and is utilized only for research and informational purposes. There are ten properties adjacent to the Project alignment identified in the 2000 investigation as potentially eligible for listing in the National Register or California Register. Each of these properties was re-examined and re-evaluated for its eligibility for listing in the National Register or California Register.

#### Properties Evaluated as Eligible for Historic Listing

During field surveys, eight properties were re-evaluated and were determined to appear eligible for listing in the National Register and/or California Register and, for this reason, are considered historical resources for the purposes of CEQA.

**260 N. Locust Street (Holy Faith Episcopal Church).** This property, located at the southeast corner of Locust Street and Grace Avenue, contains the Holy Faith Episcopal Church complex. The congregation was first established in 1911, with services held in the Inglewood Masonic Hall. In 1912, funds were donated to erect a complex consisting of a church, a rectory (the dwelling to the south), and parish hall (now a school at the rear). The complex of buildings designed by architect Philip Frohman would go on to become nationally renowned, particularly for his work on the National Cathedral in Washington, D.C. The church building was officially consecrated on November 8th, 1914. It lost its original bell tower in the 1933 Long Beach Earthquake, but continued to be improved throughout the 1930s, with the Stations of the Cross, imported from Italy; the pulpit, lectern, and choir stalls from England; and the reredos carved and imported from Bavaria. The stained-glass windows were crafted by Judson Studios in Highland Park. Due to its growing congregation, in the late 1950s architect Philip Frohman returned to design an addition to the church building. The church was extended to the west and an interior balcony added, doubling its capacity from 200 to 400. The newly expanded church building was dedicated in 1959. The parish hall, which now serves as a school, has been expanded multiple times from the 1950s to the 1980s, now extending nearly the full width of the lot. The rectory appears largely intact, with some windows replaced. In 2000, the property was assigned a status code of 4S1 (may become eligible for the National Register when it becomes old enough).

This property was re-evaluated and appears substantially intact, including the main church building, the rectory, and the school. Character-defining features of the church building include its double-cruciform plan; gabled roofs with capped parapets and decorative crosses; copper steeple; stucco exterior walls with cast-stone stepped buttresses; base with cast-stone molding; pointed-arch openings with decorative cast-stone surrounds; leaded stained-glass windows; cast-stone Gothic tracery and quoining; wood plank doors with exposed iron hardware; metal scuppers and downspouts; and decorative wrought-iron wall sconces. The church expansion was designed by the original architect to respect and complement the original church—with features such as wood entry doors and stained-glass windows retained and incorporated into the expanded design—and thus is considered to have acquired significance in its own right. Similarly, additions to the school building are compatible with yet differentiated from the original extent, which remains evident.

Because this is a religious property, in order to be eligible for listing in the National Register it must meet Criterion Consideration A. Criterion Consideration A states that a religious property must “[derive] primary significance from architectural or artistic distinction or historical importance. Indeed, the Holy Faith Episcopal Church complex was found eligible for both of these reasons, thus meeting the Criterion Consideration.

#### 4.4 Cultural Resources

According to National Park Service guidance on Criterion Consideration A as applied to eligibility under National Register Criterion A, a religious property can meet this criterion if it is significant under a historical theme not related to religion, such as patterns of settlement. Because the complex originated with the main church building constructed in 1914, the property meets Criterion Consideration A and appears eligible under National Register Criterion A as an excellent, intact example of early institutional development in Inglewood.

According to NPS guidance on Criterion Consideration A as applied to eligibility under National Register Criterion C, a religious property can meet this criterion for its architectural or artistic values.<sup>71</sup> This property represents the work of nationally-renowned architect Philip Frohman, who would become best known for his work on the National Cathedral in Washington, D.C. As noted above, Frohman was not only responsible for the church's original design but also for its mid-20th century expansion. In addition to its architecture, the church incorporated the work of various artisans, including the Stations of the Cross, imported from Italy; the pulpit, lectern, and choir stalls from England; and the reredos carved and imported from Bavaria. The stained-glass windows were crafted by the world-renowned Judson Studios in the Los Angeles neighborhood of Highland Park. Thus, the property meets Criterion Consideration A and appears eligible under National Register Criterion C as an outstanding example of Late Gothic Revival architecture, and as representing the work of master designers and artisans, including a nationally significant architect.

This property appears substantially intact, including the main church building, the rectory, and the school. The church expansion was designed by the original architect to respect and complement the original church and thus is considered to have acquired significance in its own right. Similarly, additions to the school building are compatible with yet differentiated from the original extent, which remains evident. As such, the property as a whole retains sufficient integrity to convey its significance. Therefore, the Holy Faith Episcopal Church complex meets Criterion Consideration A for Religious Properties and thus appears eligible for listing in the National Register.

**158-170 N. Market Street (former United Bank of California).** This property, located at the southeast corner of Market and Regent streets, contains a 9,000 SF branch bank building and rear surface parking lot. Originally constructed in 1967 for United Bank of California, it was designed by noted Los Angeles architect Richard Dorman in the Late Modern style. Richard Dorman was a prolific modernist architect and designer who worked throughout the Los Angeles region from the 1950s through the 1970s. Over the course of his career, he designed dozens of high-end residences, as well as various commercial and institutional buildings such as offices, churches, and banks. In 1976, the bank added a similarly designed drive-thru automated teller building across Regent Street to the north, also designed by Dorman. The

<sup>71</sup> National Register Bulletin 15, 26.

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building is currently occupied by Broadway Federal Bank. In 2000, the property was assigned a status code of 6Z (appears ineligible for the National Register).

This property was re-evaluated and found to be substantially unaltered since its original construction. Character-defining features include its cruciform roof plan; projecting trapezoidal volumes; battered walls; heavy wood beams; smooth exterior surfaces of brick and stucco; and large expanses of tinted glass. Alterations, such as contemporary signage, and the addition of an in-wall ATM with an access ramp and projecting canopy, are minor in relation to the building's overall appearance, and do not substantially diminish its integrity. At the time of its previous evaluation, the bank building was well below the 50-year age threshold used in standard preservation practice for evaluating eligibility for historic designation.<sup>72</sup> Additionally, since the 2000 survey there has been substantial new scholarship on the built environment of the mid-20th century, with new historic contexts developed to provide guidance for evaluating such properties. In light of this new scholarship, this property appears to be significant as a 1960s Late Modern-style bank building in Inglewood, representing the work of a noted architect. It remains highly intact and thus retains sufficient integrity to convey its significance as a good example of its architectural style. Therefore, the property appears eligible for listing in the California Register under Criterion 3 for its architectural merit. As such, it is considered a historical resource for the purposes of CEQA.

**100 N. Market Street/307 E. Queen Street (former Bank of Inglewood).** This property, located at the northeast corner of Market and Queen streets, contains a two-story, 9,258 SF mixed-use commercial building constructed in 1927. The building was originally constructed for the Bank of Inglewood at a cost of \$140,000. Designed by local architect William L. Campbell in the Mediterranean Revival style, the reinforced concrete building was the first steel frame business block in the city. The building was sold to Bank of America National Trust & Savings Association in 1936; in 1950 it became Southwest Bank. It now serves as a retail space occupied by Vajra Books & Gifts. In 2000, the property was assigned a status code of 3S (appears eligible for the National Register as an individual property through survey evaluation) under Criterion C as an excellent example of a 1920s Mediterranean Revival-style bank building in Inglewood.

This property was re-evaluated and found to be substantially unaltered since its original construction. The building retains the majority of its original exterior features, including its form and massing, roof material, exterior wall cladding, fenestration patterns, elaborated arched main entrance and ground-story windows, upper-story windows, and various decorative elements. Alterations—such as replaced front doors and the addition of tile cladding on the ground story—are minor in relation to the building's overall appearance, and do not substantially diminish its integrity. The building remains highly intact and continues to display the characteristic features of a Mediterranean Revival bank building from the 1920s. Thus, this building retains sufficient integrity to convey its significance as a good example of its architectural style, and

<sup>72</sup> According to National Park Service guidance, 50 years is a general estimate of time needed to develop sufficient historical perspective to evaluate historic significance.

therefore appears eligible for listing in the National Register and the California Register. As such, this property is considered a historical resource herein for the purposes of CEQA.

**129-139 S. Market Street (former J.C. Penney).** This property, located on the west side of Market Street between Queen Street and Manchester Boulevard, contains a two-story, 62,583 SF commercial retail building which originally housed a J.C. Penney department store. The building was initially constructed as one story in 1941. In 1954, it was expanded with a second story and remodeled in the Mid-Century Modern style. The Inglewood Marketplace currently occupies the building. In 2000, the property was assigned a status code of 5S1 (eligible for local listing) under Criterion C as a good example of a 1950s Mid-Century Modern-style department store building.

This property was re-evaluated and found to be substantially unaltered since its 1950s remodel. The building retains the majority of its exterior features from this period, including its form and massing, exterior wall cladding, angled storefronts, recessed entry with terrazzo flooring, entry doors, canopy, upper-story ribbon windows, and applied decoration. Alterations—such as contemporary signage and the distinctive paint job—are minor in relation to the building’s overall appearance, and do not substantially diminish its integrity. The building remains highly intact and continues to display the characteristic features of a Mid-Century Modern department store building from the 1950s. Thus, this building retains sufficient integrity to convey its significance as a good example of its architectural style, and therefore appears eligible for listing in the California Register. As such, this property is considered a historical resource for the purposes of CEQA.

**149-155 S. Market Street/231-239 E. Manchester Boulevard (Professional Building).** This property, located at the northwest corner of Market Street and Manchester Boulevard, contains a two-story, 6,000-square-foot (SF) mixed-use commercial building. Constructed in 1928 as the Professional Building, it was designed in the Spanish Colonial Revival style with cast-stone Churrigueresque details. In 2000, the property was assigned a status code of 4S7 (may become eligible for the National Register when integrity is restored).

This property was re-evaluated and despite alterations on the ground story, the upper story appears substantially unaltered since its original construction. The building retains the majority of its original exterior features, including its red clay tile shed roofs with exposed rafter tails; smooth stucco exterior cladding; wood tripartite upper-story windows; decorative cast-stone details at the roofline; and a canopy with decorative wrought-iron supports at the secondary entrance. Alterations, including replacement of ground-story storefronts and entry doors, somewhat diminish the building’s integrity. Overall, however, the building remains largely intact and continues to display the characteristic features of a Spanish Colonial Revival commercial building from the 1920s. Thus, it retains sufficient integrity to convey its significance as a good example of its architectural style, and therefore appears eligible for listing in the California

Register under Criterion 3 for its architectural merit. As such, this property is considered a historical resource for the purposes of CEQA.

**320-330 E. Manchester Boulevard (Bank of America).** This property, located at the southwest corner of Manchester Boulevard and Locust Street, contains a 21,976-SF bank building and a rear surface parking lot. Originally constructed in 1948, the building was erected for Bank of America and designed in the Late Moderne style. Bank of America continues as its current tenant. The smaller adjacent building at 320 E. Manchester Boulevard was originally constructed in 1920 and remodeled as part of the Bank of America in 1954. In 2000, the property was assigned a status code of 3S (appears eligible for the National Register as an individual property through survey evaluation) under Criterion C as a good example of a 1940s PWA Moderne-style bank building in Inglewood.

This property was re-evaluated and found to be substantially unaltered since its original construction. The building retains the majority of its original exterior features, including its form and massing, exterior wall cladding, fenestration patterns, and decorative elements. The framing of the windows and doors may have been updated. However, the replacement material appears to be in keeping with what would have been in place historically, such that this change does not substantially diminish the building’s integrity. Other changes—including lighting, signage, and the addition (and subsequent removal) of an in-wall ATM—are minor in relation to the building’s overall appearance. The building remains largely intact and continues to display the characteristic features of a PWA Moderne bank building from the 1940s. Thus, this building retains sufficient integrity to convey its significance as a good example of its architectural style, and therefore appears eligible for listing in the California Register. As such, this property is considered a historical resource for the purposes of CEQA.

**720 E. Florence Avenue (Inglewood Park Cemetery).** This property, located at the northeast corner of Manchester Boulevard and Prairie Avenue, contains a large cemetery. In 1905, a group of local businessmen formed the Inglewood Park Cemetery Association and acquired a large plot of land just east of what would become downtown Inglewood. In 1907, the cemetery erected the Romanesque-style Grace Chapel, a three-quarters replica of a church in Edinburgh, Scotland. In these early days, funerals often arriving by rail from Los Angeles in a private funeral car; portions of the original railroad waiting station have been incorporated into the main entrance. The Neoclassical-style Inglewood Mausoleum was completed in 1915 and was the first community mausoleum in the State of California. The Mausoleum of the Golden West was built over several decades from the 1930s to the 1960s and features stained-glass representations of early California by Judson Studios. Various notable persons have been laid to rest at Inglewood Park Cemetery, including some of the South Bay region’s earliest settlers, a number of Civil War veterans, and famous figures such as former Los Angeles Mayor Tom Bradley, Chet Baker, Ray Charles, Ella Fitzgerald, Etta James, boxer Sugar Ray Robinson, and architect Paul Williams. At the time of this report, both Grace Chapel and the Inglewood Mausoleum were undergoing renovation.

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This property was re-evaluated and while it has evolved over time, it remains substantially intact. The property appears to retain the majority of its original features, such as its overall form and configuration, landscape design, and main entrance, as well as multiple excellent examples of cemetery architecture, including Grace Chapel, Inglewood Mausoleum, and Mausoleum of the Golden West. Alterations, such as the addition of more recent buildings, do not substantially diminish the integrity of the property overall.

The property as a whole retains sufficient integrity to convey its significance as an excellent and rare early 20th-century cemetery in Inglewood. Additionally, Grace Chapel, Inglewood Mausoleum, and Mausoleum of the Golden West appear to be excellent examples of their architectural style. Therefore, the property appears eligible the California Register under Criterion 1 as early institutional development in Inglewood, and Criterion 3 and for the quality of its architectural and landscape design.

Because this is a cemetery property, in order to be eligible for listing in the National Register it must meet Criterion Consideration D. Criterion Consideration D states that a cemetery property must “[derive] its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, from association with historic events.”<sup>73</sup>

National Park Service guidance on the application of Criterion Consideration D explains that a cemetery property can meet this criterion and be eligible under National Register Criterion A on the basis of age if it has “achieved historic significance for [its] relative great age in a particular geographic or cultural context.”<sup>74</sup> As described in the Historical Resources Technical Report, Inglewood Park Cemetery was originally established in 1905, three years prior to the City of Inglewood’s incorporation in 1908. Grace Chapel, built in 1907, is one of the oldest, if not the oldest, remaining religious buildings in Inglewood. As noted above, the Inglewood Mausoleum was the first community mausoleum in the State of California when it was erected in 1915. For these reasons, the property meets Criterion Consideration D and appears eligible under National Register Criterion A as an excellent example of early institutional development in Inglewood.

According to NPS guidance, a cemetery property can also meet Criterion Consideration D and be eligible under National Register Criterion A as the burial place of persons of transcendent importance, defined as persons “of great eminence in their fields of endeavor or [who] had a great impact upon the history of their community, State, or nation.”<sup>75</sup> Inglewood Park Cemetery contains the graves of numerous notable persons, including some of the South Bay region’s earliest settlers, and a number of Civil War veterans. Additionally, the cemetery serves as the final resting place for a number of the region’s most prominent African American residents, including singers Ray Charles, Ella Fitzgerald, and Etta James; boxer Sugar Ray Robinson; architect Paul R. Williams; and former Los Angeles Mayor Tom Bradley. For these reasons, the

<sup>73</sup> *National Register Bulletin* 15, 25.

<sup>74</sup> *National Register Bulletin* 15, 35.

<sup>75</sup> *National Register Bulletin* 15, 34.

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property meets Criterion Consideration D and appears eligible under National Register Criterion A as the burial place of persons of transcendent importance.

Per NPS guidance, a cemetery property can meet Criterion Consideration D and be eligible under National Register Criterion C on the basis of distinctive design values, including “aesthetic or technological achievement in the fields of city planning, architecture, landscape architecture, engineering, mortuary art, and sculpture.”<sup>76</sup> As noted above, the cemetery contains several excellent examples of architecture styles, most notably the Romanesque-style Grace Chapel and the Neoclassical-style Inglewood Mausoleum. Additionally, the Mausoleum of the Golden West features scenes of early California rendered in stained-glass by the world-renowned Judson Studios in Highland Park. For these reasons, the property meets Criterion Consideration D and appears eligible under National Register Criterion C for the quality of its architecture and design.

Although this property has evolved over time, it remains substantially intact. The property appears to retain the majority of its original features, and the addition of more recent buildings do not substantially diminish the integrity of the property overall. Thus, the property as a whole retains sufficient integrity to convey its significance. Therefore, the Inglewood Park Cemetery meets Criterion Consideration D for Cemetery Properties and thus appears eligible for listing in the National Register in addition to being eligible for the California Register. As such, this property is considered a historical resource for the purposes of CEQA.

**619-635 S. Prairie Avenue (Lighthouse McCormick Mortuary).** This property, located at the northwest corner of Prairie Avenue and La Palma Drive, contains a two-story, 9,352-SF chapel and mortuary building. Designed in the American Colonial Revival style, the building was initially constructed in 1948 as the Hardin & Flanagan Colonial Chapel & Mortuary. In 1959, the business was acquired by the McCormick family and renamed McCormick Mortuary. Around 1960, the building was expanded with a new two-story wing to the north. It is currently operated as Lighthouse McCormick Mortuary.

This property was re-evaluated and found to be substantially unaltered since its 1960s expansion. The building retains the majority of its exterior features from this period, including its form and massing; hipped and gable roofs with boxed eaves; decorative cornice with return; two-story porticos with slender full-height columns; stucco and wood clapboard exterior cladding; fluted pilasters; divided-light double-hung wood windows with louvred wood shutters; wood paneled doors; round and rounded-arch openings; elaborated entrances including fanlights, sidelights, and decorative wood surrounds; and hanging lanterns. Alterations, such as replacement of an original window with a vinyl slider, are minor in relation to the building’s overall appearance, and do not substantially diminish its integrity. The mortuary’s expansion was designed to respect and complement that of the original chapel and office and is considered to have

<sup>76</sup> *National Register Bulletin* 15, 35.

acquired significance in its own right. The building remains highly intact and continues to display the characteristic features of a mid-20th century American Colonial Revival mortuary building. It retains sufficient integrity to convey its significance as an excellent example of its architectural style, and therefore appears eligible for listing in the California Register under Criterion 3 for its architectural merit. As such, this property is considered a historical resource for the purposes of CEQA.

#### Properties Evaluated as Eligible for Historic Listing

Six (6) properties that had been previously identified as potentially eligible for historic listing in the 2000 Historic Design Guidelines investigation were re-evaluated and were found to appear ineligible for historic listing due to substantial alteration. Each of these properties has been evaluated for its eligibility for listing in the California Register below.

**124-126 N. Market Street.** This property, located on the east side of Market Street between Regent and Queen streets, contains a two-story, 2,750-SF mixed-use commercial building constructed in 1920. In 2000, the property was assigned a status code of 5S1 (eligible for local listing); no reason for significance was provided.

The property was re-evaluated and found to have been substantially altered over time. The original retail storefronts have been replaced with floor-to-ceiling aluminum storefronts, thereby completely altering the ground story on the building's only publicly visible façade. On the upper story, original fenestration has been replaced with metal sliders. The building does not display the characteristic features of a particular architectural style and is not known to be the work of a master; it does not appear to be a notable example of its building type from a particular period; and it has no known important historic associations that would qualify it for historic listing or designation. Therefore, the building does not appear eligible for listing in the National Register or the California Register. As such, it is not considered a historical resource for the purposes of CEQA.

**125 S. Market Street.** This property, located on the west side of Market Street between Queen Street and Manchester Boulevard, contains a one-story commercial building constructed in 1938. The building is currently occupied by Basket Beauty Supply. In 2000, the property was assigned a status code of 5S1 (eligible for local listing) under Criterion C as an intact example of a mid-century remodeled façade.

The property was re-evaluated and found to have been substantially altered over time, including alterations since its previous evaluation. The 2000 survey referred to this building as "among the more visually interesting" mid-century façade remodels along Market Street, noting a "metal pylon sign [that] juts above the building's parapet at a sufficient height and angle to be seen by the pedestrian" and "framed [display] cases that cantilever beyond their built-in bases." None of these features remain extant. Alterations include the replacement of the exterior wall cladding on both stories, the replacement of all retail storefronts and entry doors, the addition of applied decorative features above the canopy, added

light fixtures, and contemporary signage. Taken together, these alterations have completely transformed the building's only publicly visible façade, such that it no longer displays any elements of its original 1930s design, nor does it represent a comprehensive mid-century façade remodel. Thus, this building does not retain sufficient integrity to convey its significance as a good example of its architectural style, and therefore does not appear eligible for listing in the National Register or the California Register. As such, it is not considered a historical resource herein for the purposes of CEQA.

**132 S. Market Street.** This property, located on the east side of Market Street between Queen Street and Manchester Boulevard, contains a two-story mixed-use commercial building constructed in 1925. The building is currently occupied by Smoove Fashion World. In 2000, the property was assigned a status code of 5S1 (eligible for local listing) but no reason for significance was provided.

The property was re-evaluated and found to have been substantially altered over time. The building's original retail storefront has been replaced with a floor-to-ceiling aluminum storefront, and brick veneer wall cladding and an awning have been added, thereby completely altering the building's ground story. On the upper story, original fenestration has been replaced with metal or vinyl sliders. Some original decorative features remain on the upper story. Overall, the building does not display the characteristic features of a particular architectural style and is not known to be the work of a master; it does not appear to be a notable example of its building type from a particular period; and it has no known important historic associations that would qualify it for historic listing or designation. Therefore, the building does not appear eligible for listing in the National Register or the California Register. As such, it is not considered a historical resource herein for the purposes of CEQA.

**150 S. Market Street (former People's Federal Building & Loan Association Building).** This property, located at the northeast corner of Market Street and Manchester Boulevard, contains a two-story, mixed-use commercial building originally constructed in 1927 as the People's Federal Building & Loan Association. It was remodeled in the Late Modern style, likely sometime in the 1960s, and is currently occupied by World Hat & Boot Mart. The 2000 historic resources investigation for the "Inglewood Downtown District, Main Street Project Area, Historic Design Guidelines," assigned the property a status code of 5S1 (eligible for local listing) under Criterion C as a good example of a 1960s Late Modern-style commercial building. As noted above, the 2000 historic resources investigation was limited to a reconnaissance-level survey only and did not include an intensive-level historic resources survey. The 2000 Historic Design Guidelines effort identified 150 S. Market Street as eligible for local listing only, but the City of Inglewood did not then, and does not currently, have a local landmark designation program with codified eligibility standards and criteria for local listing.

A more detailed investigation of the building indicates 150 S. Market Street is not an eligible historic resource. The building was originally constructed in 1927 and later acquired its Late Modern-style appearance in the mid-1960s. Visible elements of the underlying original 1920s building include its overall

form and massing, pedestrian orientation set at the sidewalk, clipped corner entrance, and the overall fenestration pattern including primary and secondary door openings and upper-story window openings. In the 1960s, additional design elements were applied to the primary facades of the building. These include stucco and stone panel cladding; metal-framed doors, windows, and storefronts, a flat, curved canopy over the ground story; and stylized piers on the upper story which support a flat, curved canopy suspended above the roofline. No architect was identified with this remodel. The end result is a 1920s-era building in mass and form with 1960s-era design elements applied to its facades. As such, 150 S. Market Street is not a fully realized and cohesive example of Late Modern architecture from the 1960s.

Re-evaluation of 150 S. Market Street determined the building is not a significant example of Late Modern architecture and is, therefore, not eligible for listing in the National Register under criterion C or the California Register under Criterion 3. It is not listed in a local register of historical resources and is not identified as significant in a historical resources survey which meets state criteria. Based upon this re-evaluation, the former People's Federal Building & Loan Association at 150 S. Market Street is not a historical resource for purposes of CEQA.

**302 E. Manchester Boulevard/200-204 S. Market Street (Cox Menswear).** This property, located at the southeast corner of Manchester Boulevard and Market Street, contains a two-story commercial retail building. Originally constructed in 1941, the building was designed in the Streamline Moderne style and was historically occupied by Scotty's Men's Shop. The building's current tenant is Cox Menswear. In 2000, the property was assigned a status code of 3S (appears eligible for the National Register as an individual property through survey evaluation) under Criterion C as a good example of the Streamline Moderne style in Inglewood.

The property was re-evaluated and found to have been substantially altered over time. On the ground story, the existing stone veneer and projecting aluminum-frame display windows appear to be the result of a mid-century remodel, replacing all of the original retail storefronts and wall cladding along both street-facing façades. On the upper story, original fenestration has been replaced with vinyl sliders. Also, the neon sign that originally adorned the corner tower has been removed. Due to these alterations, the building no longer displays the characteristic features of the Streamline Modern style, nor does it represent a comprehensive or wholesale stylistic remodel from a particular historic period. Thus, this building does not retain sufficient integrity to convey its significance as a good example of its architectural style, and therefore does not appear eligible for listing in the National Register or the California Register. As such, it is not considered a historical resource for the purposes of CEQA.

**333 E. Nutwood Street.** This property, located at the northwest corner of Locust and Nutwood streets, contains a one-story commercial office building constructed in 1940. The building is currently occupied by Anphon Medical Center. In 2000, the property was assigned a status code of 5S1 (eligible for local listing); no reason for significance was provided.

The property was re-evaluated and found to have been substantially altered over time. The building's exterior wall cladding has been replaced with rough-textured stucco, and exaggerated stucco-clad window surrounds have been added throughout. These changes are incompatible with the building's American Colonial Revival style, and thereby substantially alter the building's overall appearance. The building is no longer a good example of its architectural style and is not known to be the work of a master; it does not appear to be a notable example of its building type from a particular period; and it has no known important historic associations that would qualify it for historic listing or designation. Therefore, the building does not appear eligible for listing in the National Register or the California Register. As such, it is not considered a historical resource herein for the purposes of CEQA.

#### Potential Historic District

No historic districts have been identified within the Project area and/or Expanded Study Area. The extent of Market Street within the Project area and Expanded Study Area appears significant as a historic district for its association with early- and mid-20th century commercial development in the City of Inglewood. This extent comprises a significant concentration of historically related properties from a specific historic period, and thus is an identifiable entity that is distinguishable from the surrounding area. However, due to substantial changes to individual properties over time, this extent does not convey a visual sense of the overall historic environment.

A total of 42 parcels were examined and researched in detail, including parcels along both sides of Market Street, between Florence Avenue on the north and Manchester Boulevard on the south, and including all four corner parcels at the intersection of Market and Manchester. While downtown Inglewood originated in the 1920s, the period of significance for a potential historic district was extended through the 1960s to include postwar development and façade improvements that remain evident in the downtown area today.<sup>77</sup>

Of the 42 parcels that were examined, twelve were evaluated as potential district contributors (DC) if a historic district was identified,<sup>78</sup> while the remaining 30 parcels were evaluated as non-contributors (NC). Most of the non-contributing parcels were evaluated due to extensive alterations over time. Some parcels contain more recent infill development, while others are vacant lots or parking lots. With 12 of 42 parcels evaluated as potential district contributors, this results in a contribution rate of just 29 percent, which is below the requirement for an eligible historic district.<sup>79</sup> Due to this low ratio of district contributors, it was

<sup>77</sup> Of the six properties evaluated as individually eligible, three are postwar resources.

<sup>78</sup> Six of these twelve were also evaluated as individually eligible for historic listing and comprise the six identified CEQA resources discussed in the DEIR for this project.

<sup>79</sup> For a geographical area to be considered eligible for listing as a historic district, standard preservation practice requires that the majority of properties be contributors to the district.

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determined that this extent of Market Street does not retain sufficient integrity to convey its historic significance, and therefore does not meet the criteria to qualify as a historic district.

The full extent of the Market Street corridor in downtown Inglewood, extending an additional two-and-a-half blocks south of the Project Area and Expanded Study Area to Hillcrest Boulevard, was also evaluated to determine if this larger area retained sufficient integrity to qualify as a potential historic district. As with the smaller area described above, this larger segment of the Market Street corridor is considered potentially significant for its association with early- and mid-20th century commercial development in the City of Inglewood as it includes a significant concentration of historically related properties from a specific historic period. However, due to substantial changes to individual properties over time this corridor no longer conveys a visual sense of the overall historic environment. A reconnaissance-level review of these southern blocks found a somewhat higher concentration of buildings with sufficient integrity to qualify as district contributors, but not enough to offset the lower concentration in the northern blocks. Of the 64 parcels that examined along the full extent of the Market Street corridor, 23 were evaluated as potential district contributors (DC) if a historic district was identified, while the remaining 41 parcels were evaluated as non-contributors (NC). This results in a contribution rate of just 36 percent, still well below what would typically be required for an eligible historic district. Due to this low ratio of district contributors, it was determined that this larger segment of Market Street does not retain sufficient integrity to convey its historic significance, and therefore does not meet the criteria to qualify as a historic district. While Market Street largely retains its overall scale, massing and pedestrian orientation, incremental changes over time have substantially compromised the cohesion of the area as a whole. As such, Market Street does not retain the ability to convey a sense of time and place from its historic period. Despite its historic significance, Market Street in downtown Inglewood does not retain sufficient integrity to convey its significance and does thus not meet the criteria to qualify as a historic district. This determination confirms a previous evaluation of the Market Street corridor completed in a 2000 historic resources investigation prepared to support the preparation of design guidelines. The reconnaissance-level survey completed in 2000 reviewed 112 buildings and did not identify a historic district. For these reasons, Market Street does not constitute historic district and is not a historical resource under CEQA.

Summary of Historical Resources

In summary, ten (10) historical resources have been identified in the Project Area and/or Expanded Study Area as shown in **Table 4.4-1: Summary List of Historical Resources** and **Figure 4.4-2: Map of Historic Resources** below. Of these, two (2) are listed in the National Register and the California Register, and eight (8) were evaluated as appearing eligible for listing in the California Register and/or National Register. All of these properties are considered as historical resources for the purposes of CEQA and the potential for the Project to impact properties is evaluated below.

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Table 4.4-1  
Summary List of Historical Resources

Address	APN	Date	Name	Description	Current Evaluation
260 N Locust Street	4015026039	1914	Holy Faith Episcopal Church	Religious complex (Church, rectory, and School)	Appears Eligible for listing in NR and CR
158-170 N. Market Street	4021007012	1967	Former United Bank of California (now Broadway Federal Bank)	Branch bank, rear parking lot	Appears eligible for listing in CR
115 N Market Street	4021008006	1949	Former Fox Theater	Neighborhood movie theater	Listed in NR and CR
100 N. Market St/307 E. Queen Street	4021007024	1927	Former Bank of Inglewood (now Vajra Books & Gifts)	Two-story mixed-use commercial building	Appears eligible for listing in NR and CR
129-139 S Market Street	4021009031	1941, addition and remodel 1954	Former J.C. Penney (now Inglewood Marketplace)	Two-story retail commercial building	Appears eligible for listing in CR
149-155 S Market St/231-239 E Manchester Boulevard	4021009017	1928	Professional Building	Two-story mixed-use commercial building	Appears eligible for listing in CR
320-330 E Manchester Boulevard	4021013018	1948	Bank of America	Branch bank, rear parking lot	Appears eligible for listing in CR
720 E Florence Avenue	4012031930	1905	Inglewood Park Cemetery	Cemetery	Appears eligible for listing in NR and CR
3900 W Manchester Boulevard	4025001002	1967	The Forum	Multipurpose indoor arena, surrounding parking lot	Listed in NR and CR
619-635 S Prairie Avenue	4021038027	1948, addition c. 1960	Lighthouse McCormick Mortuary (former Hardin & Flanagan Colonial Chapel and Mortuary)	Two-story chapel and mortuary building	Appears eligible for listing in CR

Source: Historic Resources Technical Report, HRG, O 2021 (refer to Appendix I.2).

### 4.4.5 THRESHOLDS OF SIGNIFICANCE

The project would have a significant impact in relation to cultural resources if it were to:

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

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

*The significance of a historical resource is materially impaired when a project...[d]emolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources...local register of historical resources... or its identification in a historical resources survey.<sup>80</sup>*

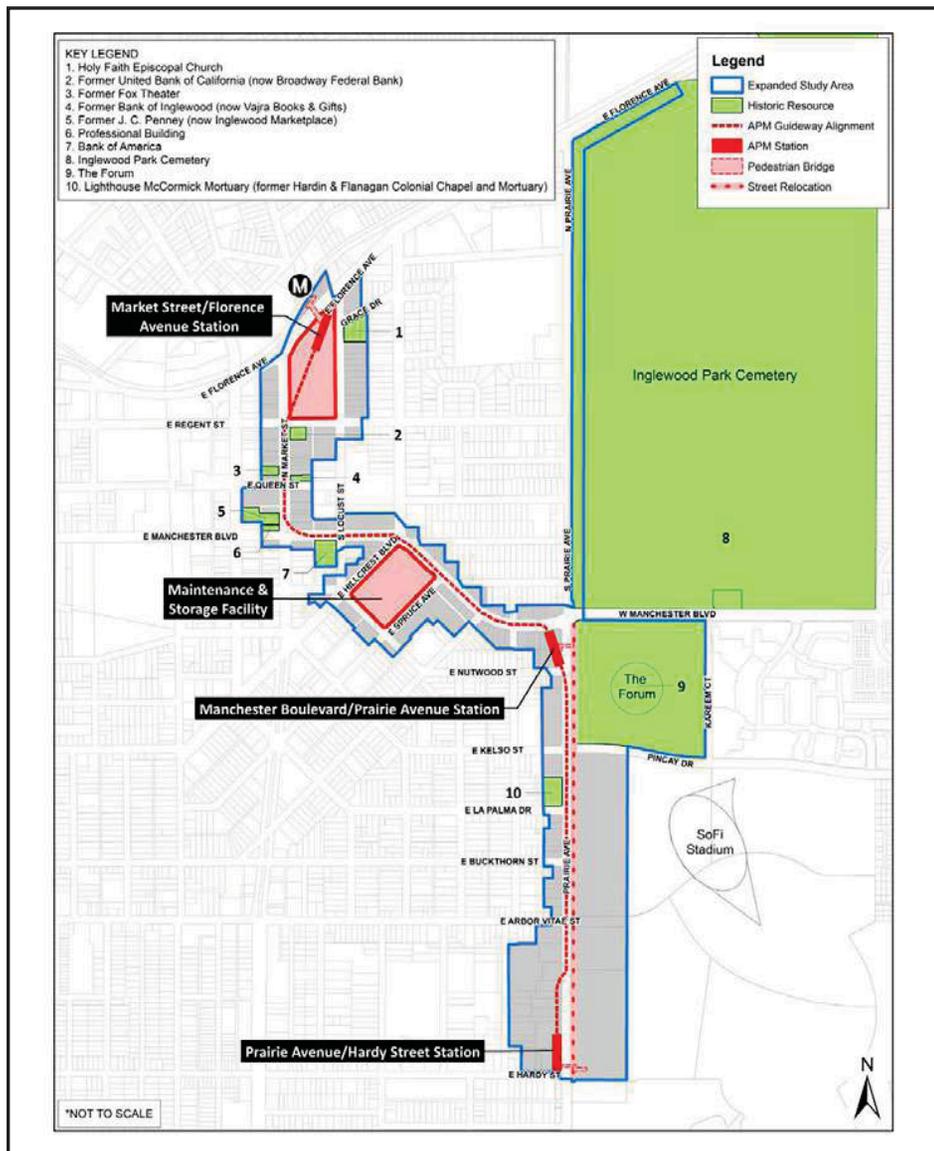
The significance of a historical resource may be materially impaired through both direct and indirect project impacts. Thus, the *Historic Resources Technical Report* (see **Appendix I.2**) analyzed the potential for the proposed Project to impact a historical resource either directly or indirectly.

### 4.4.6 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

#### 4.4.6.1 Project Design Features

The Project includes the following feature, identified in the ITC Design Standards and Guidelines (Design Guidelines), that address the potential effects of the Project on historic resources located along the proposed alignment:

<sup>80</sup> CEQA Guidelines, Section 15064.5(b).



SOURCE: Historic Resources Group, September 2021

FIGURE 4.4-2



251-004-21

## Map of Historic Resources

**PDF CUL-1 Historic Resources (Design Standards and Guidelines)**

The final Project design must consider design variables (elevation of guideway, width of guideway, distance of the guideway from the resources, and the dimensions, placement, and spacing of support columns) and resource variables (building's height, scale, number of street-facing facades, width of primary façade, front setback, project elements overhanging the sidewalk, and viewpoints from which the resource can best be discerned in its entirety). The final Project design shall ensure minimal impacts to the setting of historical resources, and little or no visual obstruction of the resource's street-facing façades from the optimal viewpoints. In order to meet these performance-based standards, the following Project Design Features shall be incorporated into the final Project design:

- The guideway's elevation and distance from the façade of the historical resource will be sufficient for the guideway to visually clear the top of the historical resources' street-facing façade(s) when viewed from the optimal viewpoints. The final Project design is expected to achieve no visual obstruction of any of the identified historical resources from the guideway.
- At the former Fox Theater, and for 100 feet on either side of the resource, the guideway elevation (measured from the ground plane to the underside of the guideway structure) will be a minimum of 52 feet from grade in order to achieve unobstructed views of this resource, including its monumental sign pylon.
- The dimensions, placement, and spacing of the guideway support columns will be such that the obstruction of views of the historical resources' street-facing façade(s) when viewed from the optimal viewpoints will be minimized. For five of the identified historical resources—Holy Faith Episcopal Church, former United Bank of California (now Broadway Federal Bank), former Fox Theater, Professional Building, and Inglewood Park Cemetery—the final Project design is expected to completely avoid visual obstructions from support columns.
- For five of the historical resources—the former Bank of Inglewood, former J.C. Penney, Bank of America, the Forum, and Lighthouse McCormick Mortuary Mortuary—views that are completely unobstructed by support columns are not necessary for the resource to convey its significance. A small portion of the resources' primary façades will be intermittently obscured depending on the position of the viewer. However, due to the scale and/or setback of these resources, their primary façades will remain readily discernable.

**Impact CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?****Impacts**

The *Historic Resources Technical Report* identified a total of ten historical built-environment resources within the proposed Project area,<sup>81</sup> as identified in **Table 4.4-1** and **Figure 4.4-2**. Two of these are listed in the National Register and the California Register, and eight have been re-evaluated as appearing eligible for listing in the National Register and/or California Register. All of these properties are considered as historical resources as defined in CEQA Guidelines Section 15064.5.

**Direct Impacts**

A direct adverse environmental impact would involve an immediate physical change in the built characteristics of a resource or its immediate surroundings that convey its historical significance. While the proposed ATS guideway and stations would largely be constructed within the public right-of-way, several properties along the ATS alignment would be affected through the development of the ATS guideway and stations on adjacent properties.

The proposed ATS guideway would result in direct physical impacts on the following resource:

- 3900 W. Manchester Boulevard (The Forum), AIN 4025-001-002.

The Forum property is located within the Project Area on the east side of Prairie Avenue. The ATS guideway and Prairie Avenue/Manchester Boulevard station are proposed on the west side of Prairie Avenue. The elevated ATS guideway will be primarily supported by columns located on the west side of Prairie Avenue within the public right-of-way. A few straddle bent columns may be necessary along this section of the alignment near the corner of Manchester Boulevard and Prairie Avenue immediately south of the Prairie Avenue/Manchester Boulevard station to support a switch zone for this station. Traffic lanes on Prairie Avenue would also be relocated to the east to accommodate the ATS columns on the west side of the street and maintain a sufficient sidewalk width. The relocation of the lane along Prairie Avenue will result in an encroachment into the Forum property along its western boundary. Straddle bent support columns may land on the east side of the ATS guideway in what is now the Forum parking lot. An elevated passenger walkway will be constructed from the Prairie Avenue/Manchester Boulevard Station, with vertical circulation elements (stairs, escalators, elevators) landing on the east side of Prairie in the current Forum parking lot.

<sup>81</sup> *Historic Resources Technical Report*. Inglewood Transit Connector. October 4, 2021.

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The Project will not physically alter the Forum building itself. The building will remain in its original location and will retain all of its significant character-defining features. The Project will alter a portion of the Forum's surface parking lot, which is defined in the National Register nomination for the Forum as one of the Forum's character-defining features. The Project will encroach into the Forum parking lot along its western edge between Manchester Boulevard and Pincay Drive no more than 30 feet to accommodate the relocation of one of the traffic lanes on Prairie Avenue. This encroachment will alter the original dimensions of the property. Because this encroachment will only affect the westernmost 30 feet of the large parking lot around the Forum building, the parking lot will retain its overall character as an expansive, on-grade, asphalt-paved parking area surrounding the Forum building on all sides.

The stairway and elevator components from the elevated passenger walkway from the Prairie Avenue/Manchester Boulevard station will land on what is currently the Forum property. These elements would be constructed within the public right-of-way of the newly relocated sidewalk on the east side of Prairie Avenue. These features would be situated along the property's western edge and there will remain a substantial physical distance of over 300 feet between these new features and the Forum building itself. The Project, therefore, will not alter the relationship between the Forum building and its immediate surroundings in any meaningful way.

The view for motorists of the Forum building from Prairie Avenue looking east and pedestrian views from the west sidewalk will be intermittently obstructed by the straddle-bent support columns supporting the ATS guideway and the stairs and elevators from the elevated passenger walkway. However, pedestrian views from the new sidewalk on the east side of Prairie Avenue will remain largely unobstructed with only minimal impairment. Views of the Forum building looking south from Manchester Boulevard and north from Pincay Drive will also remain unobstructed. Overall, the new construction will not block or obscure important views of the Forum building, as there will remain multiple vantage points from which the building can be observed without obstruction. The Forum property will retain its essential character as a large circular building set at the center of a sprawling, generally open site with largely unobstructed views from all sides. Important features of the Forum's setting are limited mainly to the property itself, the most important of which is the expansive surface parking area surrounding the building on all sides. Although the Project will encroach on the Forum property along the eastern edge of the parking lot, the important aspects of the Forum's historical setting will remain intact.

Because the Project will not physically alter the Forum building; will not block or obscure important views of the Forum building; and will only alter a small portion of the Forum parking lot; the revised Project will not result in a substantial adverse change in the significance of the historical resource. After construction of the Project, the Forum will continue to convey its historic significance as a 1960s New Formalist-style

#### 4.4 Cultural Resources

arena in Inglewood. Therefore, direct, and indirect impacts to the Forum as a result of the revised Project would be less than significant.

#### Indirect Impacts

An indirect impact is distinguished in this evaluation as a physical change which is not immediately related to the Project, but which is caused indirectly by the Project. An indirect adverse environmental impact would involve a substantial alteration in how a resource is viewed and experienced by pedestrians and motorists through obscuring, interfering, or blocking the view of a resource from the public right-of-way. An example would be new construction that diminishes the ability of a historical resource to convey its significance by blocking or obscuring character-defining features after the project has been completed. These indirect impacts 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 the California Register, local register, or historical resource survey. Built-environmental historical resources identified along the proposed Project's footprint, including those adjacent the proposed ATS guideway alignment and stations, have been determined to convey their historical significance through physical characteristics such as design, construction, and/or form.

The Project could potentially result in indirect impacts on the following seven resources as discussed below:

- 158-170 N. Market Street (former United Bank of California)
- 115 N. Market Street (former Fox Theater)
- 100 N. Market St/307 E Queen Street (former Bank of Inglewood)
- 129-139 S. Market Street (former J.C. Penney)
- 149-155 S. Market Street/231-239 E Manchester Boulevard (Professional Building)
- 320-330 E. Manchester Boulevard (Bank of America)
- 619-635 S. Prairie Avenue (Lighthouse McCormick Mortuary)

The ATS guideway and stations would follow Market Street, Manchester Boulevard, and Prairie Avenue and pass directly in front of these resources. The ATS guideway and support structure would not physically alter these buildings in any way and the buildings would remain in their original locations, retaining all their significant character-defining features and materials. The proposed Project would erect substantial new physical structure features in the form of the ATS guideway and support structures within proximity to these buildings along Market Street and Manchester Boulevard. However, the guideway structure and the support columns would only obscure a limited portion of the facades for five of the six historical

resources, depending on the position of the viewer. Additionally, the ATS guideway would be elevated above the roadway and sidewalks, and often substantially higher than the historic structures. For these reasons, the proposed Project would have a less than significant indirect impact on the former United Bank of California building, the former Fox Theater building, the former Bank of Inglewood building, the former J.C. Penney building, the Professional Building, the Bank of America building, and the Lighthouse McCormick Mortuary. Impacts to each of these resources is described below.

158-170 N. Market Street (former United Bank of California)

The former United Bank of California building is located on the east side of Market Street, immediately adjacent to the proposed location of the ATS guideway.<sup>82</sup>

The Project will not physically alter the former United Bank of California building in any manner. The building will remain in its original location and will retain all of its significant character-defining features. However, the Project will erect a substantial new physical structure in front of and within close proximity of the building along Market Street, altering its setting and potentially interfering with the visual and spatial relationships between the building and its immediate surroundings. Because the United Bank of California building is set back slightly from the property line, important setting features are limited to the building parcel and the configuration of the street and sidewalk fronting the building's east-facing façade. New construction has the potential to encroach upon and reduce the generally open area of public street and sidewalk that partly defines the building's setting. The Project also has the potential to limit the ability of the building to convey its historic significance by substantially obscuring its primary façade when viewed from the west side of Market Street which is an important vantage point from which to understand the building's overall scale, massing composition, and design. The building's secondary façade along Regent Street will not be obscured by the Project.

The ATS guideway will be elevated above the roadway and sidewalks, passing directly in front of the United Bank of California building. As shown in the updated conceptual Project plans, the edge of the guideway will be approximately 38 feet from the building's façade and approximately 24 feet from the projecting canopy. The bottom of the guideway will be elevated a minimum of 40 feet above the roadway. Additionally, the guideway will be carried by single columns positioned in the center of Market Street, one of which will be located in front of or immediately adjacent to the United Bank of California. The support columns will be a round shape approximately 8 feet in diameter and spaced a minimum of 120 feet apart on center. Moreover, **PDF CUL-1** has been incorporated into the Project that requires the elevation and distance of the guideway from the façade of the historical resource to be sufficient for the guideway to visually clear the top of the historic resources' street facing façade. **PDF CUL-1** also requires the

<sup>82</sup> The drive-thru automated teller building across the street is not considered part of the bank building.

dimensions, placement, and spacing of the guideway support columns be optimized to minimize the obstruction of views of the street facing facades of historical buildings.

These elements will allow for a substantial distance between the ATS guideway and the United Bank of California building, maintaining a substantial portion of the existing open sidewalk and street area that partly defines the building's setting. The United Bank of California building measures approximately 23 feet in height and the guideway will clear the top of the building by approximately 17 feet. Because the guideway will be a substantial distance away from the façade of the United Bank of California building's and positioned a substantial distance higher than the building, it will not obscure important physical features of the primary façade when viewed from the west side of Market Street.

Because two columns will sit in front of or immediately adjacent to the United Bank of California building, a portion of the building's primary façade will be intermittently obscured depending on the position of the viewer. However, due to the dimensions and spacing of the columns, only a very limited portion of the United Bank of California building's primary façade will be obstructed when viewed from the west side of Market Street. The north façade facing Regent Street will remain unobstructed. Those portions of the building's façade that will be obscured will be minor in comparison to the overall size of the building, the majority of which will remain visible. Because the ATS guideway would be located approximately 17 feet above the top of the United Bank of California building and the center support columns carrying the guideway will only obscure a small portion of the building's primary façade, the Project will not obscure its primary façade such that its physical form and architectural style cannot be discerned. Ultimately, the building's overall scale, massing, composition, and design will remain readily discernable despite some intermittent obscuring of physical features from some views.

The Project will alter the historic setting of the United Bank of California building by placing new construction along Market Street. However, this alteration to setting will not substantially interfere with the visual and spatial relationships between the building and its immediate surroundings. **PDF CUL-1** requires the height of the guideway, the distance of the guideway from the edge of the building, and the size and spacing of the vertical supporting columns to be designed in a manner that maintains important aspects of the existing setting of this resource and ensures that the overall scale, massing, composition, and design of the building will remain readily discernable. For architecturally significant historical resources like the United Bank of California building, the most important aspects of integrity are design, workmanship, and materials. Although integrity of setting will be altered along Market Street, all of the other aspects of integrity including location, design, materials, workmanship, feeling and association will remain and, for these reasons, the historical resource will retain overall integrity. The United Bank of California building will continue to convey its historic significance after implementation of the Project and as such, the impact of the Project to the historic resource will be less than significant.

115 N. Market Street (former Fox Theater)

The former Fox Theater building is located on the west side of Market Street, immediately adjacent to where the new ATS guideway will be located in the center of Market Street.

The Project will not physically alter the Fox Theater building in any way. The building will remain in its original location and will retain all of its significant character-defining features. The Project will, however, erect a substantial new physical structure in front of, and within close proximity to, the Fox Theater, altering its setting and potentially interfering with the visual and spatial relationships between the buildings and their immediate surroundings. Because the Fox Theater building is built to the property line, important features of the building are limited to the scale of the surrounding development and configuration of the street and sidewalk fronting the building's west and south façades. New construction has the potential to encroach upon and reduce the generally open area of public street and sidewalk that defines the building's setting. New construction also has the potential to limit the building's ability to convey its historic significance by substantially obscuring its primary east-facing façade when viewed from the west side of Market Street, an important vantage point from which to understand the building's overall scale, massing, composition, and design.

The former Fox Theater building conveys its historical significance through its only public façade on Market Street, an important vantage point from which to observe the building's primary façade. The ATS guideway will be elevated above the roadway and sidewalks, passing directly in front of the Fox Theater building. The main volume of the Fox Theater building measures approximately 38 feet tall, with its vertical sign pylon, an important feature of the front facade, rising to a height of approximately 70 feet.

As shown in the conceptual Project plans, the horizontal distance from the edge of the guideway to the marquee will be approximately 17 feet; the horizontal distance from the edge of the guideway to the building façade would be approximately 28 feet, based on a maximum guideway width of 42 feet. The guideway along the frontage of the building would be supported by single columns positioned in the center of Market Street, with no columns located directly in front of, or immediately adjacent to, the Fox Theater building.

In order to allow continued views of the sign pylon, the height of the guideway will be raised so that the bottom is a minimum of 53 feet from grade above the roadway. This minimum elevation will be maintained for approximately 100 feet to the north and south of the Fox Theater. This would allow for a greater distance between the ATS guideway and the Fox Theater building, maintaining much of the existing open sidewalk and street that define the building's setting. The height of the guideway in front of the Fox Theater building, the stipulation that no support columns will be located in front of or adjacent to the Fox Theater and the horizontal separation between the Fox Theater and the guideway would ensure that the

Project would not obscure important physical features of the primary façade, including the vertical sign pylon, when viewed from the east side of Market Street.

The Project will alter the historic setting of the Fox Theater building by placing new construction along Market Street. However, this alteration to the setting will not substantially interfere with the visual and spatial relationships between the building and its immediate surroundings. **PDF CUL-1** requires minimum visual clearances; including the height of the guideway, the distance of the guideway from the edge of the building, and the size and spacing of the vertical supporting columns, to be incorporated into project design. The Project will be designed in a manner that maintains important aspects of the resource's existing setting and ensures that its overall scale, massing, composition, and design will remain readily discernable. For architecturally significant historical resources like the Fox Theater building, the most important aspects of integrity are design, workmanship, and materials. Although integrity of setting will be altered along Market Street, all of the other aspects of integrity, including location, design, materials, workmanship, feeling and association will remain, and therefore the historical resource will retain integrity overall. The Fox Theater building will continue to convey its historic significance as a 1940s Late Moderne-style movie theater building after implementation of the Project and as such, indirect impacts to the Fox Theater building would be less than significant.

100 N. Market St/307 E Queen Street (former Bank of Inglewood)

The former Bank of Inglewood building is located on the west side of Market Street, immediately adjacent to where the new ATS guideway will be located.

The Project will not physically alter the former Bank of Inglewood building in any manner. The building will remain in its original location and will retain all of its significant character-defining features. The Project will, however, erect a substantial new physical structure in front of and within close proximity of the buildings along Market Street, altering their setting and potentially interfering with the visual and spatial relationships between the buildings and their immediate surroundings. Because the Bank of Inglewood building is built to the property line, important setting features are limited to the scale of the surrounding development and configuration of the street and sidewalk fronting the building's west and south façades. New construction has the potential to encroach upon and reduce the generally open area of public street and sidewalk that defines the building's setting. New construction also has the potential to limit the building's ability to convey its historic significance by substantially obscuring its primary façade when viewed from the west side of Market Street, which is an important vantage point from which to understand the building's overall scale, massing composition, and design. The building's façade along Queen Street will not be obscured by the Project.

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The ATS guideway will be elevated above the roadway and sidewalks, passing directly in front of the Bank of Inglewood building. The edge of the guideway will be approximately 29 feet from the façade of the Bank of Inglewood building (assuming a maximum guideway width of 42 feet). Additionally, the guideway will be supported by single columns positioned in the center of Market Street, one of which will likely be located in front of or immediately adjacent to the Bank of Inglewood building. The support columns will be round in shape, approximately 8 feet in diameter, and spaced a minimum of 120 feet apart on center. This will allow for a substantial distance between the ATS guideway and the Bank of Inglewood building, maintaining much of the existing open sidewalk and street that define the setting of the building. The Bank of Inglewood building measures approximately 33 feet in height; thus, the guideway will be higher than the building by approximately 7 feet. Because the guideway will be a substantial distance away from the Bank of Inglewood building's façade, and positioned a substantial distance higher than the building, it will not obscure important physical features of the primary façade when viewed from the west side of Market Street.

With a single column located adjacent to the Bank of Inglewood building, a portion of the building's primary façade will be intermittently obscured depending on the position of the viewer. However, due to the dimensions and spacing of the columns, only a very limited portion of the Bank of Inglewood building's primary façade will be obstructed when viewed from the west side of Market Street. The larger south façade facing Queen Street will remain unobstructed. Additionally, columns will be placed so that the important corner view of the building, which takes in the entirety of both publicly visible façades, will be maintained. Those portions of the building's façade that will be obscured will be minor in comparison to the overall size of the building, the majority of which will remain visible. Because the ATS guideway would be located at least 7 feet higher than the Bank of Inglewood building and the center support columns carrying the guideway will only obscure a small portion of the building's primary façade, the Project will not obscure its primary facade such that its physical form and architectural style cannot be discerned. Moreover, **PDF CUL-1** requires the guideway's elevation and distance from the façade of the historical resource to be sufficient for the guideway to visually clear the top of the historic resources' street facing façade. **PDF CUL-1** also requires the dimensions, placement, and spacing of the guideway support columns will be such that the obstruction of views of historical resources' street facing facades will be minimized. Ultimately, the building's overall scale, massing, composition, and design will remain readily discernable despite some intermittent obscuring of physical features from some views.

The Project will alter the historic setting of the Bank of Inglewood building by placing new construction along Market Street. However, this alteration to setting will not substantially interfere with the visual and spatial relationships between the building and its immediate surroundings. **PDF CUL-1** requires the height of the guideway, the distance of the guideway from the edge of the building, and the size and spacing of the vertical supporting columns to be designed in a manner that maintains important aspects of the

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existing setting of the building, which will ensure that the overall scale, massing, composition, and design of this building will remain readily discernable.

For architecturally significant historical resources like the Bank of Inglewood building, the most important aspects of integrity are design, workmanship, and materials. Although integrity of setting will be altered along Market Street, all of the other aspects of integrity including location, design, materials, workmanship, feeling and association will remain, and therefore the historical resource will retain integrity overall. Thus, the Bank of Inglewood building will continue to convey its historic significance after implementation of the revised Project and as such, the indirect impact of the Project to this historic resource would be less than significant.

#### 129-139 S. Market Street (former J.C. Penney)

The former J.C. Penney building is located on the west side of Market Street adjacent to where the new ATS guideway will be located. The former J.C. Penney building conveys its historical significance through its only public façade on Market Street, an important vantage point from which to observe the building's primary façade and main entry.

The Project will not physically alter the former J.C. Penney building in any way. The building will remain in its original location and will retain all of its significant character-defining features. However, the Project will erect a substantial new physical structure in front of and within close proximity of the buildings along Market Street, altering their setting and potentially interfering with the visual and spatial relationships between the buildings and their immediate surroundings. Because the J.C. Penney building is built to the property line, important setting features are limited to the scale of the surrounding development and configuration of the street and sidewalk fronting the building's east façade. New construction has the potential to encroach upon and reduce the generally open area of public street and sidewalk that defines the building's setting. New construction also has the potential to limit the building's ability to convey its historic significance by substantially obscuring its primary façade when viewed from the east side of Market Street—an important vantage point from which to understand the building's overall scale, massing composition, and design.

The ATS guideway will be elevated above the roadway and sidewalks, passing directly in front of the J.C. Penney building. The edge of the guideway will be approximately 21 feet to the building's projecting canopy and approximately 28 feet to the building façade at its closest point, after which the guideway pulls further away from the building as it turns the corner onto Manchester Boulevard. The bottom of the guideway will be approximately of 40 feet above the roadway. Additionally, the guideway will be carried by single columns positioned in the center of Market Street, one of which will be located in front of or immediately adjacent to the J.C. Penney building. The support columns will be round in shape,

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approximately 8 feet in diameter, and spaced a minimum of 120 feet apart when measured from the center of the column.

This will allow for distance between the ATS guideway and the J.C. Penney building, maintaining a substantial portion of the existing open sidewalk and street that define the building's setting. The J.C. Penney building measures approximately 30 feet in height so the guideway will clear the top of the building by approximately 10 feet. Because the guideway will be a substantial distance away from the J.C. Penney building façade, and positioned a substantial distance higher than the building, it will not obscure important physical features of the primary façade when viewed from the east side of Market Street. Additionally, **PDF CUL-1**, incorporated into the Project, requires the guideway's elevation and distance from the façade of the historical resource to be sufficient for the guideway to visually clear the top of the historic resources' street facing façade. **PDF CUL-1** also requires the dimensions, placement, and spacing of the guideway support columns will be such that the obstruction of views of historical resources' street facing facades will be minimized.

With a single column located in front of or adjacent to the J.C. Penney building, a portion of the building's primary façade will be intermittently obscured depending on the position of the viewer. However, due to the dimensions and spacing of the columns, only a very limited portion of the J.C. Penney building's primary façade will be obstructed when viewed from the east side of Market Street. The portion of the building's façade that will be obscured will be minor in comparison to the overall size of the building, the majority of which will remain visible. Because the ATS guideway would be located approximately 10 feet higher than the J.C. Penney building and the support columns carrying the guideway will only obscure a small portion of the building's primary façade, the Project will not obscure its primary facade such that its physical form and architectural style cannot be discerned. Ultimately, the building's overall scale, massing, composition, and design will remain readily discernable despite some intermittent obscuring of physical features from some views.

The Project will alter the historic setting of the J.C. Penney building by placing new construction along Market Street. However, this alteration to setting will not substantially interfere with the visual and spatial relationships between the building and its immediate surroundings. **PDF CUL-1** requires that the height of the guideway, the distance of the guideway from the edge of the building, and the size and spacing of the vertical supporting columns, have been designed in a manner that maintains important aspects of the resource's existing setting and ensures that its overall scale, massing, composition, and design will remain readily discernable.

For architecturally significant historical resources like the J.C. Penney building, the most important aspects of integrity are design, workmanship, and materials. Although integrity of setting will be altered along Market Street, all of the other aspects of integrity, including location, design, materials, workmanship,

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feeling and association, will remain, and therefore the historical resource will retain integrity overall. Thus, the J.C. Penney building will continue to convey its historic significance as a 1950s Mid-Century Modern-style department store building after implementation of the Project and the impact of the Project to this historic resource will be less than significant.

#### 149-155 S. Market Street/231-239 E Manchester Boulevard (Professional Building)

The Professional Building is located on the west side of Market Street, immediately adjacent to where the new ATS guideway will be located. The Professional Building conveys its historical significance through its two publicly visible facades, on Market Street (primary) and Manchester Boulevard (secondary).

The Project will not physically alter the Professional Building in any way. The building will remain in its original location and will retain all of its significant character-defining features. However, the Project will erect a substantial new physical structure in front of and within close proximity of the building along Market Street, altering its setting and potentially interfering with the visual and spatial relationships between the building and its immediate surroundings. Because the Professional Building is built to the property line, important setting features are limited to the building parcel and the configuration of the street and sidewalk fronting the building's east- and south-facing façades. New construction has the potential to encroach upon and reduce the generally open area of public street and sidewalk that partly defines the building's setting. New construction also has the potential to limit the building's ability to convey its historic significance by substantially obscuring its primary façade when viewed from the east side of Market Street—an important vantage point from which to understand the building's overall scale, massing composition, and design. The building's secondary façade along Manchester Boulevard will not be obscured by the Project.

The ATS guideway will be elevated above the roadway and sidewalks, passing directly in front of the Professional Building. The edge of the guideway will be approximately 47 feet from the building's façade at its closest point, after which the guideway pulls further away as it turns the corner onto Manchester Boulevard. The bottom of the guideway will be elevated approximately 40 feet above the roadway. Additionally, as the guideway makes its turn at Market Street and Manchester Boulevard, the columns will be placed on the opposite (east) side of the Market Street and on Manchester Boulevard. Because no columns will sit in front of or immediately adjacent to the Professional Building, the building's primary facade will not be obscured when viewed from the east side of Market Street. The south façade facing Manchester will also remain unobstructed.

This allows for a substantial distance between the ATS guideway and the Professional Building, maintaining more of the existing open sidewalk and street area that partly defines the building's setting. The Professional Building measures approximately 32 feet in height; thus, the guideway will clear the top of

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the building by approximately eight feet. Because the guideway will be a substantial distance away from the Professional Building's façade, and positioned a substantial distance higher than the building, it will not obscure important physical features of the primary façade when viewed from the east side of Market Street. Ultimately, the building's overall scale, massing, composition, and design will remain readily discernable. Moreover, **PDF CUL-1** has been incorporated into the Project that requires the guideway's elevation and distance from the façade of the historical resource to be sufficient for the guideway to visually clear the top of the historic resources' street facing façade. **PDF CUL-1** also requires the dimensions, placement, and spacing of the guideway support columns will be such that the obstruction of views of historical resources' street facing facades will be minimized.

The Project will alter the historic setting of the Professional Building by placing new construction along Market Street. However, this alteration to setting will not substantially interfere with the visual and spatial relationships between the building and its immediate surroundings. **PDF CUL-1** requires the height of the guideway, the distance of the guideway from the edge of the building, and the size and spacing of the vertical support columns, to be designed in a manner that maintains important aspects of the resource's existing setting and ensures that its overall scale, massing, composition, and design will remain readily discernable. Although integrity of setting will be altered along Market Street, all of the other aspects of integrity, including location, design, materials, workmanship, feeling and association, will remain, and therefore the historical resource will retain integrity overall. For these reasons, the Professional Building will continue to convey its historic significance as a 1920s Spanish Colonial Revival-style commercial building after implementation of the Project and as such, the indirect impact of the Project to the historic resource would be less than significant.

#### 320-330 E. Manchester Boulevard (Bank of America)

The Bank of America building is located on the south side of Manchester Boulevard, adjacent to where the new ATS guideway will be located. The Bank of America building conveys its historical significance through its two publicly visible facades, on the south side of Manchester Boulevard (primary), and Locust Street (secondary).

The revised Project will not physically alter the Bank of America building in any manner. The building will remain in its original location and will retain all of its significant character-defining features. However, the revised Project will erect a substantial new physical structure in front of this resource, altering its setting and potentially interfering with the visual and spatial relationships between the building and its immediate surroundings. The setting of a historical resource includes features within its boundaries as well as its immediate surroundings. Because the Bank of America building is built to the property line, important setting features are limited to the scale of the surrounding development and configuration of the street and sidewalk fronting the building's north and east façades. New construction has the potential to

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encroach upon and reduce the generally open area of public street and sidewalk that defines the building's setting. New construction also has the potential to limit the building's ability to convey its historic significance by substantially obscuring its primary façade when viewed from the north side of Manchester which is a critical vantage point from which to understand the building's overall scale, massing, composition, and design.

The ATS guideway will be elevated above the roadway and sidewalks, passing directly in front of the Bank of America building. The edge of the guideway will be approximately 30 feet from the façade of the Bank of America building (assuming a maximum guideway width of 42 feet). The bottom of the ATS guideway would be elevated a minimum of 40 feet above the roadway.

The guideway along Manchester Boulevard would be supported by single columns in a new center median. Each column will be approximately 8 feet in diameter and spaced a minimum of 120 feet apart on center. As a result, the support columns will be located away from the Bank of America building façade with substantial space between columns, maintaining much of the existing open sidewalk and street that define the building's setting. The Bank of America building measures approximately 28 feet in height; the guideway will clear the top of the building by approximately 12 feet. Because the guideway will be a substantial distance away from the Bank of America building's façade, and positioned a substantial distance higher than the building, it will not obscure important physical features of the primary façade when viewed from directly across the street on the north side of Manchester.

With single columns located within the center of Manchester Boulevard in the vicinity of the Bank of America building, portions of the building's primary facade will be intermittently obscured depending on the position of the viewer. However, due to the planned dimensions and spacing of the columns, only very limited portions of the Bank of America building's primary façade will be obstructed when viewed from the north side of Manchester Boulevard. Those portions of the building's façade that will be obscured will be minor in comparison to the façade's total size, the majority of which will remain unobstructed. Because the ATS guideway would be located approximately 12 feet above the top of the Bank of America Building and the center support columns carrying the guideway will only obscure small portions of the building's primary façade, the Project will not obscure its primary facade such that its physical form and architectural style cannot be discerned. The building's overall scale, massing, composition, and design will remain readily discernable despite some intermittent obscuring of some views. The revised Project will alter the historic setting of the Bank of America building by placing new construction along Manchester Boulevard. However, this alteration to the setting will not substantially interfere with the visual and spatial relationships between the building and its immediate surroundings. **PDF CUL-1**, incorporated into the Project, requires the guideway's elevation and distance from the façade of the historical resource to be sufficient for the guideway to visually clear the top of the historic resources' street facing façade. **PDF CUL-**

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1 also requires the dimensions, placement, and spacing of the guideway support columns will be such that the obstruction of views of historical resources' street facing facades will be minimized. **PDF CUL-1** ensures that the Bank of America building's overall scale, massing, composition, and design will remain readily discernable.

For architecturally significant historical resources like the Bank of America building, the most important aspects of integrity are design, workmanship, and materials. Although integrity of setting will be altered along Manchester Boulevard, all of the other aspects of integrity, including location, design, materials, workmanship, feeling and association, will remain, and therefore the historical resource will retain integrity overall. The Bank of America building will continue to convey its historic significance after implementation of the revised Project and as such, the indirect impact of the revised Project to the historical resource would be less than significant.

#### 619-635 S. Prairie Avenue (Lighthouse McCormick Mortuary)

The Lighthouse McCormick Mortuary property is located on the west side of Prairie Avenue, adjacent to where the new ATS guideway will be located. The Lighthouse McCormick Mortuary building conveys its historical significance through its main public façade on Prairie Avenue, an important view from which to observe the building's primary east-facing façade and main entry.

The Project will not physically alter the Lighthouse McCormick Mortuary property. The building will remain in its original location and will retain all of its significant character-defining features. However, the Project will erect a substantial new physical structure in front of the mortuary property, altering its setting and potentially interfering with the visual and spatial relationships between the building and its immediate surroundings to the east. The Lighthouse McCormick Mortuary property is set back from the property line behind a front lawn. Important setting features are limited to the property itself and the configuration of the street and sidewalk fronting the building's east-facing façade. New construction has the potential to encroach upon and reduce the generally open area of public street and sidewalk that partly defines the building's setting. New construction also has the potential to limit the building's ability to convey its historic significance by substantially obscuring its primary façade when viewed from Prairie Avenue. The building's secondary façade along La Palma Drive will not be obscured by the revised Project.

The ATS guideway will be elevated above the roadway and sidewalks, passing directly in front of the Lighthouse McCormick Mortuary property. The bottom of the guideway will be elevated approximately 40 feet above the roadway, meaning the ATS guideway will clear the top of the mortuary building by approximately 10 feet. Additionally, the guideway will be carried by three support columns positioned on the Prairie Avenue sidewalk in front of the mortuary building.

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The Project will alter the immediate surroundings of the Lighthouse McCormick Mortuary by encroaching on the existing open sidewalk and street area that partly defines the building's setting. ATS support columns will also partially obscure the mortuary building's primary façade from some vantage points on the east side of Prairie Avenue. Because three columns will sit in front of the Lighthouse McCormick Mortuary property, a portion of the building's primary façade will be intermittently obscured depending on the position of the viewer. However, due to the dimensions and spacing of the columns, only a very limited portion of the Lighthouse McCormick Mortuary property's primary façade will be obstructed when viewed from the west side of Prairie Avenue. More importantly, the mortuary's primary façade is set back from the sidewalk behind a front lawn, physically separating between the mortuary building and the new construction. Due to this separation, the mortuary building's primary façade will not be obscured from vantage points on the east side of Prairie Avenue. The south façade facing La Palma Drive will remain unobstructed. Those portions of the building's façade that will be obscured will be minor in comparison to the overall size of the building, the majority of which will remain visible.

Because the ATS guideway would be located approximately 10 feet higher than the Lighthouse McCormick Mortuary property and the center support columns carrying the guideway will only obscure a small portion of the building's primary façade, the Project will not obscure its primary facade such that its physical form and architectural style cannot be discerned. In addition, **PDF CUL-1** has been incorporated into the Project which requires the guideway's elevation and distance from the façade of the historical resource to be sufficient for the guideway to visually clear the top of the historic resources' street facing façade. **PDF CUL-1** also requires the dimensions, placement, and spacing of the guideway support columns will be such that the obstruction of views of historical resources' street facing facades will be minimized. The building's overall scale, massing, composition, and design will remain readily discernable despite some intermittent obscuring of physical features from some views.

The Project will alter the historic setting of the Lighthouse McCormick Mortuary property by placing new construction along Prairie Avenue including the placement of three support columns within the Prairie Avenue sidewalk in front of the Mortuary building. This alteration to setting will not substantially interfere with the visual and spatial relationships between the building and its immediate surroundings. **PDF CUL-1** requires the height of the guideway, the distance of the guideway from the edge of the building, and the size and spacing of the vertical supporting columns, to be designed in a manner that maintains important aspects of the resource's existing setting and ensures that it's overall scale, massing, composition, and design will remain readily discernable.

For architecturally significant historical resources like the Lighthouse McCormick Mortuary property, the most important aspects of integrity are design, workmanship, and materials. Although integrity of setting will be altered along Market Street, all of the other aspects of integrity, including location, design,

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materials, workmanship, feeling and association, will remain, and therefore the historical resource will retain integrity overall. The Lighthouse McCormick Mortuary property will continue to convey its historic significance after implementation of the Project and the indirect impact of the Project to the historic resource will be less than significant for this reason.

**Summary of Impacts**

The Project will result in both direct and indirect impacts to historical resources under CEQA. Of the ten (10) historical resources identified in the Project Area and/or Expanded Study Area, the Project will have a less than significant impact on eight (8) resources, and no impact on two (2) resources. There will be no significant impacts to historical resources as a result of the Project as summarized below in **Table 4.4-2: Historical Resources Impact Summary**.

**Table 4.4-2  
Historical Resources Impact Summary**

Address	APN	Name	No Impact	Less Than Significant Impact	Significant Impact
260 N Locust St	4015026039	Holy Faith Episcopal Church	✓		
158-170 N Market St	4021007012	Broadway Federal Bank (former United Bank of California)		✓	
115 N Market St	4021008006	Former Fox Theater		✓	
100 N Market St/ 307 E Queen St	4021007024	Vajra Books & Gifts (former Bank of Inglewood)		✓	
129-139 S Market St	4021009031	Former J.C. Penney		✓	
149-155 S Market St/ 231-239 E Manchester Bl	4021009017	Professional Building		✓	
320-330 E Manchester Bl	4021013018	Bank of America		✓	
720 E Florence Ave <sup>83</sup>	4012031930	Inglewood Park Cemetery	✓		
3900 W Manchester Bl	4025001002	The Forum		✓	
619-635 S Prairie Ave	4021038027	Lighthouse McCormick Mortuary (former Hardin & Flanagan Colonial Chapel and Mortuary)		✓	

Source: *Historic Resources Technical Report*, HRG, October 2021 (refer to **Appendix I.2**).

<sup>83</sup> The parcel situated within the Expanded Study Area (APN 4012031930) has no address and contains only a small portion of the Inglewood Park Cemetery property. The vast majority of the cemetery occupies the adjacent parcel at 720 E Florence Avenue (APN 4012031027).

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**Impact CUL-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?**

**Impacts**

Section 15064.5 of the CEQA Guidelines generally defines a historic or archeological resource as a resource that is (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the PRC); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the PRC) in addition to maintaining a sufficient level of physical integrity.

Further, CEQA considers unique archaeological resources including archaeological artifact, object, or site which can clearly demonstrate the following criteria: (1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type; or (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.<sup>84</sup> Unique archaeological resources include material evidence of past human life and culture of previous ages.

A literature review and records search were conducted at the South Central Coastal Information Center housed at California State University, Fullerton on June 20, 2018.<sup>85</sup> The records search included the proposed Project footprint and an area of a half-mile surrounding the Project area. The records search indicated there are no prehistoric or historical archaeological resources recorded within a half-mile radius of the area. In addition to the records search, a reconnaissance survey of the proposed Project area was conducted on July 20, 2018, also resulting in negative findings of prehistoric or historic archaeological resources identified. However, ground visibility surrounding the proposed Project footprint is very poor due to a high level of urbanization and development and any resources buried below ground would be difficult to observe.

During construction, the proposed Project 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

<sup>84</sup> California PRC, Sections 21083.2, Archeological Resources.

<sup>85</sup> *Cultural Resource Investigation*, Roberta Thomas, M.A., RPA, and Gena Granger, M.A., RPA, PaleoWest Archaeology (PaleoWest), December 12, 2018.

destroyed during drilling. Therefore, there is a potential significant impact for unearthing or destroying previously unknown archaeological resources during construction.

Operation of the proposed Project would not involve ground disturbing activities and, therefore, would not have the opportunity to unearth previously unknown archaeological resources. Operation of the proposed Project would have no impact on archaeological resources at or around the proposed Project area.

#### **Mitigation Measures**

**MM TCR-1 to MM TCR-4** from **Section 4.13**.

#### **Level of Significance after Mitigation**

The impacts associated with causing a substantial adverse change in the significance of an archaeological resource would be reduced to a less-than-significant-level with the implementation of **MM TCR-1 to MM TCR-4**. The measures would require the contractor to hire a qualified archaeologist meeting 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, including on-site monitoring of any ground disturbing activities. The monitor would be versed in locating and identifying archeological artifacts. This would increase the likelihood for locating archeological resources unearthed on-site and properly identifying its significance. Proper treatment of the artifacts immediately after discovery would be determined by the qualified archaeologist to minimize adverse change in the significance of the archeological resource discovered.

Prior to construction all construction personnel associated with demolition and ground disturbance activities would also be required to receive Cultural Resources Sensitivity Training, which would include training in identifying characteristics of archeological resource finds. Minimizing the possibility to cause substantial adverse change to significant archeological resources due to construction activities. 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 project applicant regarding recommendation for treatment and ultimate disposition of the resource(s). This process would ensure proper treatment and processing of the archeological resources found. Therefore, potential impacts associated with causing a substantial adverse change in the significance of an archaeological resource would be reduced to a less-than-significant-level.

**Impact CUL-3: Disturb any human remains, including those interred outside of formal cemeteries.**

#### **Impacts**

A significant adverse effect would occur if ground disturbing activities associated with the proposed Project were to disturb previously interred human remains. Construction of the proposed Project would require extensive construction of foundations and columns, as well as other ground-disturbing activities. Required construction activities have the potential for unearthing and destroying unknown human remains underground which were not observed during the field survey. Thus, the potential to disturb human remains exists and this potential impact would be significant.

Discovery of Native American human remains is further discussed in **Section 4.13**.

#### **Mitigation Measures**

**MM TCR-1, MM TCR-3 and MM TCR-5** from **Section 4.13**.

#### **Level of Significance after Mitigation**

The impacts associated with disturbing any undiscovered human remains would be reduced to a less-than-significant-level with the implementation of **MM TCR-1, MM TCR-3, and MM TCR-5**. The measures would require the contractor to hire a qualified monitor on-site to monitor any ground disturbing activities. The monitors would be versed in locating and identifying human remains. Prior to construction all construction personnel associated with demolition and ground disturbance activities would also be required to receive Cultural Resources Sensitivity Training, which would include training in identifying human remains. In the event human remains is found, work would immediately cease within 150 feet of the discovery and the County coroner would be contacted in accordance with PRC Section 5097.98 and Health and Safety Code Section 7050.5. The City, tribal cultural resources monitor, and archaeological monitor would also be notified. Proper treatment and processing of the human remains would be carried out in compliance with PRC Section 5097.98, Health and Safety Code Section 7050.5, **MM TCR-1, MM TCR-3, and MM TCR-5**. Therefore, potential impacts to disturbing human remains would be reduced to a less-than-significant-level.

#### **4.4.7 CUMULATIVE IMPACTS**

The cumulative context for historic resources can be defined by a number of factors depending on the conditions and the presence or absence of known historic resources in the area. No historic district has been identified within the Project Area or Expanded Study Area and, for this reason, there is no potential for cumulative impacts to historical resources as a result of the proposed Project.

For the proposed Project, the cumulative context for historical resources considers impacts to significant historical resources in Inglewood. The majority of the cumulative projects identified in **Section 4.0** involve commercial and residential developments, many of which are smaller in scale, while the HPSP accounts for a large portion of the cumulative development. The HPSP EIR was certified in 2009 and concluded that the HPSP project would result in a less-than-significant impact to historic resources. Given the long history of Inglewood and large number of historic-age buildings and structures throughout the City it is possible that historical resources may be significantly impacted as a result of at least one of the identified cumulative projects that constitute the cumulative context. Therefore, the cumulative impact on historic architectural resources is considered potentially significant. Because the Project would not be constructed within a Historic District and would result in less than significant impacts to historical resources, the Project's incremental contribution to the potential significant cumulative impact on cultural resources would not be cumulatively considerable.

#### 4.4.8 CONSISTENCY WITH CITY OF INGLEWOOD GENERAL PLAN

##### Land Use Element

The City's Land Use Element<sup>86</sup> was adopted in 1980 and subsequently amended in 1986, 2009, 2015, 2016, and 2020. Applicable goals to the Cultural Resources section were added in 2016 to the Land Use Element with the adoption of the New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines described below.

##### ***New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines***

The New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines<sup>87</sup> (Downtown TOD Plan) covers the Downtown Inglewood and Fairview Heights neighborhoods of the City and works to implement the City's vision for transforming the quality of the environment within these areas. The Downtown TOD Plan area consists of approximately 585 acres located in the center of Inglewood along the Metro K line just east of the Florence Avenue/La Brea Avenue intersection. This Downtown planning and zoning area extends approximately one-half mile in all directions from the Metro Downtown Inglewood Station.

The Downtown TOD Plan planning effort were incorporated into the Land Use Element with its 2016 update. Relevant goals and policies in the Downtown TOD are listed as follows:

<sup>86</sup> City of Inglewood. *Land Use Element*. <https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-PDF>. Accessed July 22, 2020.

<sup>87</sup> City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, November 1, 2016.

<b>Goal 1:</b>	Downtown is a place to live, work, shop, recreate, and be entertained.
<b>Policy 1.2:</b>	Ground Floor Uses and Storefronts. Require uses that activate pedestrian activity such as retail on major streets and plaza frontages. Require that storefronts be historically sensitive, attractive, and transparent in the Historic Downtown.
<b>Goal 2:</b>	Downtown is a revitalized yet forward-looking gathering place for the community.
<b>Policy 2.3:</b>	Preservation of Historic Fabric. Require the preservation of buildings that have been designated as historic and encourage the reuse of other historic buildings. Maintain the sense of place in areas with historic fabric and/or meaning such as Market Street between Regent Street and Hillcrest Avenue and the Hillcrest neighborhood east of Locust Street.
<b>Goal 6:</b>	Downtown expresses the unique culture of Inglewood.
<b>Policy 6.1:</b>	Districts. Define the following unique districts within the Downtown TOD area, each with their own unifying character or identity that should be preserved and enhanced: Historic Downtown, Civic Center, TechTown, Beach Avenue, Fairview West, Hillcrest and Queen Street.

The proposed Project is consistent with the Policy 1.2 and Policy 6.1 within the Downtown TOD Plan in the Land Use Element. The design of the proposed ATS system has taken into consideration storefronts and retail on major streets within the project footprint to limit its direct and indirect impact to surrounding historic resources. Resources impacted by the proposed Project would be mitigated to the extent feasible and impacts to publicly visible facades would be minimized as allowed for by proposed Project design.

The proposed Project would be consistent with Policy 2.3 within the Downtown TOD Plan through the implementation of an amendment proposed by the Project, by adding the underlined language to the end of Policy 2.3's text:

- Policy 2.3: *Preservation of Historic Fabric*. Require the preservation of buildings that have been designated as historic and encourage the reuse of other historic buildings. Maintain the sense of place in areas with historic fabric and/or meaning such as Market Street between Regent Street and Hillcrest Avenue and the Hillcrest neighborhood east of Locust Street, while also accommodating for the development of the Inglewood Transit Connector along Market Street between Regent Street and Manchester Boulevard.

The amendment would allow the policy to take into account the historical significance of Inglewood Downtown while accommodating for the implementation of the ATS system. Historical resources would remain recognized as an important part of the Inglewood Downtown and any impacts to historical resources would be mitigated to the extent feasible. The proposed Project would be consistent with Policy 2.3 with the proposed amendment.

## 4.5 ENERGY RESOURCES

### 4.5.1 INTRODUCTION

This section of the Recirculated Draft Environmental Impact Report (Recirculated Draft EIR) evaluates potential impacts associated with the proposed Inglewood Transit Connector Project (proposed Project) as it relates to energy resources, focusing on the following three resources: electricity, natural gas, and transportation-related energy (petroleum-based fuels). This section contains: (1) a summary of the federal, State, and local regulations related to energy demand and conservation; (2) a description of the energy consumption from the proposed Project, as well as a description of the Adjusted Baseline Environmental Setting; and (3) an analysis of the potential impacts related to energy demand associated with the implementation of the proposed Project.

Appendix F: Energy Conservation of the State California Environmental Quality Act (CEQA) Guidelines identifies the suggested requirements to be considered in an EIR relative to the potential energy impacts of a proposed Project, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy.

Furthermore, this section addresses the infrastructure capacity and demand associated with the energy consumption of the proposed Project, energy conservation and sustainability measures that may be included in the proposed Project. The proposed Project includes ITC Design Standards and Guidelines (Design Guidelines) and a Construction Commitment Program (CCP) provided in **Appendix C** and **Appendix D** to this Recirculated Draft EIR. These features align with Inglewood's commitment to sustainability Citywide, as outlined in the City's Energy and Climate Action Plan and Energy Efficiency Climate Action Plan. These sustainability features serve as a mechanism to promote the City's commitment to reduce its environmental footprint and promote energy efficient design requirements, water conservation, and water quality improvement projects, natural resource protection efforts, waste reduction and recycling, and numerous air quality emissions reduction policies and programs.

For construction impacts, the City would include in bid documents for the proposed Project language specifying that the Project's contractors shall use Tier 4 construction equipment or equivalent on the proposed Project (see **PDF AQ-1** in the CCP). For operational impacts, the proposed Project would comply with the requirements of California Green Building Standards Code (CALGreen), the Design Guidelines and be consistent with the City Energy Efficiency Climate Action Plan policies and programs related to sustainability, energy efficiency, and reduction in greenhouse gas (GHG) emissions. The City has committed to taking an active role in promoting energy conservation and environmentally-friendly initiatives to improve the environment and realize the co-benefits, which include energy independence, cost savings

for energy not used, water saved, improved air quality, and public health benefits from improved air quality.

Energy calculations for this analysis were conducted for existing uses, and proposed Project construction and operation. These calculations are detailed within the following appendices to this Recirculated Draft EIR:

- *Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition*, Lea + Elliott, August 2021 (**Appendix E**)
- *Existing Conditions Energy Calculations*, Meridian Consultants LLC, September 2021 (**Appendix J.1**)
- *Electricity Calculations for Project Construction*, Meridian Consultants LLC, September 2021 (**Appendix J.2**)
- *Vehicle Fuel Calculations for Project Construction*, Meridian Consultants LLC, September 2021 (**Appendix J.3**)
- *Project Operational Energy Calculations*, Meridian Consultants LLC, September 2021 (**Appendix J.4**)
- *Operational Vehicle Fuel Calculations*, Meridian Consultants LLC, September 2021 (**Appendix J.5**)
- *Project Operational Vehicle Fuel Calculations*, Meridian Consultants LLC, September 2021 (**Appendix J.7**)
- *Vons Store Replacement Energy Calculations*, Meridian Consultants LLC, October 2021 (**Appendix J.8**)

Air quality and GHG emissions associated with energy production—that is, production of electricity and the combustion of fuels—are discussed in the impact analyses in **Sections 4.2: Air Quality** and **4.7: Greenhouse Gas Emissions**. Potential conflicts between the proposed Project and existing utility infrastructure that would result in environmental impacts are discussed in **Section 4.14: Utilities and Service Systems**.

After circulation of the December 2020 Draft EIR for public review, the City revised the design of the proposed Project in response to consultation with key stakeholders in the community and comments received on the December 2020 Draft EIR. Specific changes to the proposed Project include raising the height of the ATS guideway along Market Street to preserve existing views of historic buildings, relocating the Prairie Avenue/Pincay Drive Station to the southwest corner of Prairie Avenue and Manchester Boulevard, redesign of the proposed MSF to allow this facility to be located on the proposed site with a new Vons store, and realignment of the guideway and stations on Prairie Avenue to the west side of Prairie Avenue. In addition, the two power distribution system (PDS) substations are now proposed to be located on the MSF and Prairie Avenue/Hardy Street station sites. As it relates to energy impacts, these changes include updated construction and operational details which resulted in reductions of energy resource consumption compared to the December 2020 Draft EIR.

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Recirculated Draft EIR.

#### 4.5.2 METHODOLOGY

This analysis compares energy consumption associated with the proposed Project to those under the Adjusted Baseline conditions as defined in **Section 4.0: Environmental Impact Analysis, 4.0.5: Adjusted Baseline**. Energy demand for the proposed Project has been estimated based on generation factors for use type or on specifications for similar facilities at other locations and as estimated by the system design engineers in the Operating Systems Conceptual Report.<sup>1</sup>

Specific assumptions and data sources needed to quantify energy consumption during both construction and operation are presented in **Section 3.0: Project Description**. The methods and scenarios used for the energy calculations are the same as those used for the air quality emissions calculations, as discussed in **Section 4.2**.

##### 4.5.2.1 Construction

Annual energy use includes mobile sources and energy usage associated with the existing on-site structures that would be removed and replaced with construction of the proposed Project. The proposed Project would require a number of full and partial property acquisitions and easements or leases for construction and operation of the guideway, stations, maintenance, and storage facility (MSF), and other support facilities included in the proposed Project. (See **Section 3.0** for a detailed discussion of the existing land uses that would be demolished as part of the proposed Project).

Construction energy consumption would result from transportation fuels (e.g., diesel and gasoline) used for haul trucks, heavy-duty construction equipment, construction workers traveling to and from the proposed Project, electricity consumed to power the construction trailers (lights, electronic equipment, and heating and cooling), and exterior uses such as lights, conveyance of water for dust control, and any electrically-driven construction equipment.

Construction activities could vary substantially from day to day, depending on the specific type of construction activity and the number of workers and vendors that would travel to the proposed Project. This analysis considered these factors and provided the estimated maximum construction energy consumption for the purposes of evaluating the associated impacts on energy resources. The anticipated construction program is discussed in **Section 3.0, 3.7: Construction**. Further details are provided in **Appendix F: ITC Construction Scenarios**.

<sup>1</sup> Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021.

Construction fuel use was forecasted by assuming a conservative estimate of construction activities and applying mobile source emission factors. Construction activities are expected to commence in early 2024 and be completed in 2027.

Construction electricity use was estimated for a temporary construction office, for construction equipment that would use electricity as an alternative to diesel fuel, and for water usage from dust control activities. The CalEEMod emissions model, described further in **Sections 4.2**, was used to estimate the proposed Project's emissions of criteria air pollutants, and was also used to estimate electricity, natural gas, and water use. The same model used for air quality analyses was also used for the purpose of estimating energy use.

The construction office was assumed to be two 2,500 SF trailers and was modeled using the CalEEMod land use category for "General Office." Electricity demand by construction equipment was estimated using default horsepower (hp) and load factors from CalEEMod and hours of operation per day.<sup>2</sup> The total horsepower-hours (hp-h) were then converted to kilowatt-hours (kWh) using a standard conversion factor.

Natural gas would not be consumed in large quantity during construction of the proposed Project because construction offices would not be heated with natural gas, and construction equipment and vehicles would be primarily powered by either diesel, gasoline, or electricity.

Transportation fuels would be consumed for transportation of construction workers and materials to and from the proposed Project, and operation of construction equipment throughout the construction phases. Fuel consumption from on-site heavy-duty construction equipment was calculated based on the equipment mix estimated in the **Appendix F**. The total hp was then multiplied by fuel usage estimates per hp-h from the CARB off-road vehicle (OFFROAD) model.<sup>3</sup>

Fuel consumption from construction on-road worker, vendor, and delivery/haul trucks was calculated using the trip rates and distances consistent with the air quality emissions modeling worksheets and CalEEMod construction output files (see **Section 4.2**). Total vehicle miles travelled (VMT) for these on-road vehicles were then calculated for each type of construction-related trip and divided by the corresponding County-specific miles per gallon factor using the CARB EMFAC2017 model. The model was used to calculate fuel consumed based on the total annual VMT for each vehicle type. A combination of CalEEMod assumed trip lengths and client-provided specific trip lengths were used for worker commutes, vendor and concrete trucks, and haul truck trips (see **Appendix F**). Consistent with CalEEMod, construction worker trips were assumed to include a mix of light duty gasoline automobiles and light duty gasoline trucks.

<sup>2</sup> South Coast Air Quality Management District, 2017. CalEEMod® Users Guide Appendix D: Default Data Tables. October 2017.

<sup>3</sup> California Air Resources Board, 2017. Off-Road Diesel Emission Factor Update for NO<sub>x</sub> and PM. 2017.

Construction vendor trucks were assumed to be a mix of medium-heavy duty and heavy duty diesel trucks and concrete and haul trucks were assumed to be heavy-duty diesel trucks.

The energy usage required for construction of the proposed Project was estimated based on the number and type of construction equipment that would be used during construction by assuming a conservative estimate of construction activities (i.e., maximum daily equipment usage levels) (see **Appendix F**). Energy for construction-worker commuting trips was estimated based on the predicted number of workers for the various phases of construction, and the estimated VMT based on the conservative values in the CalEEMod and EMFAC2017 models. The assessment also includes a discussion of the proposed Project's compliance with relevant energy-related regulatory requirements and incorporation of design features discussed in **4.7**, which would minimize the amount of energy usage during construction. These measures are also discussed in **Section 3.0**.

The estimated fuel economy for heavy-duty construction equipment was based on fuel consumption factors from the CARB OFFROAD emissions model, which is a State-approved model for estimating emissions from off-road heavy-duty equipment. The estimated fuel economy for haul trucks, vendor trucks, concrete trucks, and worker commute vehicles was based on fuel consumption factors from the CARB EMFAC 2017 emissions model, which is a State-approved model for estimating emissions from on-road vehicles and trucks.

#### 4.5.2.2 Operation

Operational energy impacts were assessed based on the increase in energy demand compared to existing conditions described. Operation of the proposed Project would include implementation of a number of sustainability measures as noted in **Section 3.0**, 3.5.9.

Operational energy associated with the existing uses to be demolished were subtracted from the total operations of the proposed Project to calculate the net energy consumed. Within the CalEEMod software, building electricity and natural gas usage rates were adjusted to account for prior Title 24 Building Energy Efficiency Standards for the existing uses.<sup>4</sup> As stated previously, the net change in operational energy demand was based on the difference between the existing baseline condition energy demand and the energy demand of the proposed Project at full buildout. The following discusses only the methodology for the new operations at the proposed Project's MSF, power distribution system (PDS) substations, stations, and train operations as detailed in the Operating Systems Conceptual Report.<sup>5</sup>

<sup>4</sup> California Air Resources Board, 2016. *CalEEMod\* Users Guide*, Appendix E, Section 5. September 2016. Factors for the prior Title 24 standard are extrapolated based on the technical source documentation.

<sup>5</sup> Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021.

The proposed Project operational natural gas demand would be generated mainly by building heating/cooling of the MSF and stations. The proposed Project estimated natural gas demand was analyzed relative to Southern California Gas Company (SoCalGas) existing and planned energy supplies in 2027 (i.e., the proposed Project buildout year)<sup>6</sup> to determine whether the utility would be able to meet the proposed Project energy demands. Furthermore, natural gas demand generated by the existing uses to be demolished were calculated using demand factors provided in CalEEMod and subtracted from the proposed Project natural gas demand to obtain the net annual natural gas demand.

Mobile source fuel consumption for the proposed Project during operation would include event-day trips related to commute trips by employees and suppliers.

### 4.5.3 REGULATORY FRAMEWORK

#### 4.5.3.1 Federal Regulations and Directives

##### *Energy Policy and Conservation Acts*

The Federal Energy Policy and Conservation Act of 1975,<sup>7</sup> the Federal Energy Policy Act of 2005,<sup>8</sup> and the Energy Independence and Security Act of 2007<sup>9</sup> require the US Department of Energy (USDOE) to set electrical efficiency standards of various appliances, fixtures, and equipment.

The Energy Independence and Security Act of 2007 includes standards for an increased Corporate Average Fuel Economy standard of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by the 2020 model year, in addition to provisions for Renewable Fuel Standard, Appliance and Lighting Efficiency Standards, and Building Energy Efficiency. The Act includes standards for general service lighting that will require lightbulbs to consume 60 percent less energy by 2020. This standard is leading to the phasing out of incandescent lightbulbs to be replaced by more efficient lighting. Additional provisions of the Act address energy savings in government and public institutions; promote research for alternative energy, carbon capture, and international energy programs; and create green jobs.

##### *Corporate Average Fuel Economy Standards*

Established by the US Congress in 1975, the Corporate Average Fuel Economy (CAFE) standards<sup>10</sup> reduce energy consumption by increasing the fuel economy of cars and light trucks. The National Highway Traffic Safety Administration (NHTSA) and United States Environmental Protection Agency (USEPA) jointly

<sup>6</sup> California Gas and Electric Utilities, 2020. *2020 California Gas Report, 2020*. While the estimated life of the proposed Project would be 30 years, comparison to the year of 2027 provides a conservative analysis as supply projections for electricity and natural gas increase in future years.

<sup>7</sup> Energy and Policy Conservation Act (EPCA) (Pub. Law 94-163, 89 Stat. 871, enacted December 22, 1975).

<sup>8</sup> 42 USC §13201 et seq. (2005).

<sup>9</sup> Public Law 110-140 (2007).

<sup>10</sup> For more information on the CAFE standards, refer to <https://www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy>.

administer CAFE standards. The US Congress has specified that CAFE standards must be set at the “maximum feasible level” with consideration given to: (1) technological feasibility; (2) economic practicality; (3) effect of other standards on fuel economy; and (4) need for the nation to conserve energy.

Fuel efficiency standards for medium- and heavy-duty trucks have been jointly developed by USEPA and NHTSA. The Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018, and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type. USEPA and NHTSA have also adopted the Phase 2 heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.<sup>11</sup>

#### ***US Department of Transportation, US Department of Energy, and US Environmental Protection Agency Influence on Transportation Energy***

On the federal level, the US Department of Transportation (USDOT), USDOE, and USEPA are three agencies with substantial influence over energy policies related to transportation fuels consumption. Generally, federal agencies influence transportation energy consumption through establishment and enforcement of fuel economy standards for automobiles and light trucks, through funding of energy-related research and development projects, and through funding for transportation infrastructure projects.

#### **4.5.3.2 State Regulations and Directives**

##### ***California Public Utilities Commission***

The California Public Utilities Commission (CPUC) has authority to set electric rates, regulate natural gas utility service, protect consumers, promote energy efficiency, and ensure electric system reliability. The CPUC has established rules for the planning and construction of new transmission facilities, distribution facilities, and substations. Utility companies are required to obtain permits to construct certain power line facilities or substations. The CPUC also has jurisdiction over the siting of natural gas transmission lines.

The CPUC regulates distributed energy generation policies and programs for both customers and utilities. This includes incentive programs (e.g., California Solar Initiative) and net energy metering policies. Net energy metering allows customers to receive a financial credit for power generated by their on-site system and fed back to the utility. The CPUC is involved with utilities through a variety of energy procurement programs, including the Renewable Portfolio Standard program.

<sup>11</sup> US Environmental Protection Agency, 2016. Federal Register/Vol. 81, No. 206/Tuesday, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2. October 25, 2016.

In 2008, the CPUC adopted the Long-Term Energy Efficiency Strategic Plan, which is a road map to achieving maximum energy savings in California through 2020.<sup>12</sup> Consistent with California's energy policy and electricity “loading order,” the Energy Efficiency Strategic Plan indicates that energy efficiency is the highest priority resource in meeting California's energy needs. The CPUC also adopted energy goals that require all new residential construction in California to be zero net energy by 2020. The zero net energy goal means new buildings must use a combination of improved efficiency and distributed renewable energy generation to meet 100 percent of their annual energy need. In addition to the zero net energy goals for residential buildings by 2020, the CPUC has adopted goals that all new commercial construction in California will be zero net energy by 2030 and 50 percent of existing commercial buildings will be retrofitted to zero net energy by 2030.

#### ***California Energy Commission***

The California Energy Commission (CEC) is primary energy policy and planning agency in California. Created by the California Legislature in 1974, the CEC has five major responsibilities: (1) forecasting future energy needs and keeping historical energy data; (2) licensing thermal power plants 50 MW or larger; (3) promoting energy efficiency through appliance and building standards; (4) developing energy technologies and supporting renewable energy; and (5) planning for and directing State response to energy emergencies.

#### ***Senate Bill 1389***

Senate Bill (SB) 1389 requires the CEC to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the electricity, natural gas, and transportation fuel sectors in California, and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the State economy; and protect public health and safety.<sup>13</sup>

The 2019 Integrated Energy Policy Report<sup>14</sup> provides the results of the CEC assessments of a variety of energy topics in California, including electricity sector trends, building decarbonization and energy efficiency, zero-emission vehicles, energy equity, climate change adaptation, electricity reliability in Southern California, natural gas assessment, and electricity, natural gas, and transportation energy demand forecasts.

<sup>12</sup> CPUC, *Long Term Energy Efficiency Strategic Plan*. 2008

<sup>13</sup> SB 1389, (PRC sections 25300–25323)

<sup>14</sup> *Final 2019 Integrated Energy Policy Report*, Adopted February 20, 2020, <https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2019-integrated-energy-policy-report>. Accessed September 28, 2021.

### **California Green Building Standards Code**

Adopted in 2010, and updated periodically, CALGreen is found in Part 11, Title 24 of the California Code of Regulations (CCR).<sup>15</sup> The purpose of CALGreen is to cause a reduction in GHG emissions; promote environmentally responsible, cost effective, healthier places to live and work; and reduce energy and water consumption. CALGreen identifies mandatory building measures and voluntary measures that may be incorporated into the design of buildings. CALGreen establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development, energy efficiency, water conservation, material conservation, and interior air quality.

The 2019 CALGreen Code took effect January 1, 2020. CALGreen requires every new building constructed in California to reduce water consumption by 20 percent, divert 65 percent of construction waste from landfills, and install low-pollutant-emitting materials. It also requires separate water meters for nonresidential buildings' indoor and outdoor water use, with a requirement for moisture-sensing irrigation systems for larger landscape projects and mandatory inspections of energy systems (e.g., heat furnace, air conditioner, and mechanical equipment) for nonresidential buildings larger than 10,000 SF to ensure that all are working at their maximum capacity and according to their design efficiencies.

### **Senate Bill 350, Clean Energy and Pollution Reduction Act of 2015**

SB 350, the Clean Energy and Pollution Reduction Act of 2015, requires that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased from 33 percent to 50 percent by December 31, 2030; thereby doubling energy efficiency within the State.<sup>16</sup> SB 350 makes revisions to the California Renewable Portfolio Standards (RPS) Program and to certain other requirements on public utilities and publicly owned electric utilities. SB 350 also requires local, publicly owned electric utilities to establish annual targets for energy efficiency savings and demand reduction consistent with a Statewide goal established by the California Public Utilities Commission and provides incentives for electrification of rail facilities. Local utilities would be required to develop more detailed strategies and incentives for use of renewable energy sources, resulting in an increased demand for renewable energy generation.

SB 350 emphasizes the important role of electric vehicles in California's overall scheme to combat climate change, declaring that "[d]eveloping electric vehicles should assist in grid management, integrating generation from eligible renewable energy resources, and reducing fuel costs for vehicle drivers." The bill (1) promotes the development of additional electric vehicle charging infrastructure to encourage greater

<sup>15</sup> California Green Building Standards Code (CCR, Title 24, Part 11 - CALGreen)

<sup>16</sup> SB 350, Clean Energy and Pollution Reduction Act.

use of electric cars; and (2) requires electrical utilities to include expansion of electrical vehicle charging facilities as part of their strategies and incentives for reducing overall energy consumption.

### **Assembly Bill 32**

In 2006, Governor Schwarzenegger signed Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006,<sup>17</sup> which focused on reducing GHG emissions in California to 1990 levels by 2020. CARB has the primary responsibility for reducing the GHG emissions in California; however, AB 32 also tasked the CEC and CPUC with providing information, analysis, and recommendations to CARB regarding strategies to reduce GHG emissions in the energy sector.

### **Senate Bill 32**

Enacted in 2016, SB 32 codifies the 2030 emissions reduction goal by requiring CARB to ensure that Statewide GHG emissions are reduced to 40 percent below 1990 levels by 2030. The reduction of GHG emissions is a priority for development projects throughout the State and is achieved through a combination of policies, planning, direct regulations, market approaches, incentives, and voluntary efforts. Generally speaking, the focus of GHG emission reductions is on energy production and motor vehicles.

### **AB 1007**

AB 1007<sup>18</sup> required the CEC to prepare a State plan (State Alternative Fuels Plan) to increase the use of alternative fuels in California. The Commission prepared the State Alternative Fuels Plan in partnership with CARB and in consultation with other State, federal, and local agencies. The final State Alternative Fuels Plan,<sup>19</sup> published in December 2007, attempts to achieve an 80 percent reduction in GHG emissions associated with personal transportation, even as California's population increases.

### **SB 1368, Performance Standard for Baseload Power Generation**

SB 1368 (Chapter 598, Statutes of 2006), Performance Standard for Baseload Power Generation,<sup>20</sup> required the CPUC to establish a GHG emissions performance standard for "baseload" generation from investor-owned utilities of 1,100 pounds of carbon dioxide per megawatt hour (MWh). The CEC established a similar standard for local publicly owned utilities. All electricity provided to California, including imported electricity, must be generated from plants that meet or exceed this standard.

<sup>17</sup> Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006 (codified in the California Health and Safety Code (HSC), Division 25.5.

<sup>18</sup> AB 1007, Pavley, Chapter 371, Statutes of 2005.

<sup>19</sup> State Alternative Fuels Plan.

<sup>20</sup> SB 1368 - Emission Performance Standards, Perata, Chapter 598, Statutes of 2006.

### **SB X1-2, Renewable Portfolio Standard**

California law (SB X1-2, Statutes of 2011) requires retail suppliers of electricity to source at least 33 percent of annual retail sales from eligible renewable energy sources by 2020.<sup>21</sup>

### **Executive Order S-03-05**

Executive Order S-03-05 mandates that California emit 80 percent fewer GHGs in 2050 than it emitted in 1990.<sup>22</sup> Energy efficiency and reduced VMT would play important roles in achieving this goal.

### **Executive Orders S-14-08 and S-21-09**

Since 2006, California has had a mandate to increase the use of renewable generation to 20 percent of retail electricity sales by 2010. In November 2008, Governor Schwarzenegger signed Executive Order S-14-08, which raises California's renewable energy goals to 33 percent by 2020.<sup>23</sup> This enhanced target is intended to help California meet Statewide GHG emission reduction targets. This has been reiterated by California Executive Order S21-09 which charged CARB to establish a regulation consistent with this 33 percent target by 2020.<sup>24</sup> This represented an increase in RPSs over SB 1078<sup>25</sup> and SB 107.<sup>26</sup> State RPSs have since been expanded with SB 350.

### **Low Carbon Fuel Standard**

The Low Carbon Fuel Standard (LCFS), established in 2007 through Executive Order S-1-07 and administered by CARB, requires producers of petroleum-based fuels to reduce the carbon intensity of their products, starting with 0.25 percent in 2011 and culminating in a 10-percent total reduction in 2020.<sup>27</sup> Petroleum importers, refiners, and wholesalers can either develop their own low carbon fuel products, or buy LCFS credits from other companies that develop and sell low carbon alternative fuels, such as biofuels, electricity, natural gas, and hydrogen.

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

In 2004, CARB adopted an Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling to reduce public exposure to diesel particulate matter emissions.<sup>28</sup> The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are

<sup>21</sup> SB X1-2, Statutes of 2011.

<sup>22</sup> California Executive Order S-03-05, June 2005.

<sup>23</sup> California Executive Order S-14-08, November 2008.

<sup>24</sup> California Executive Order S-21-09, September 2009.

<sup>25</sup> SB 1078, Chapter 516, Statutes of 2002.

<sup>26</sup> SB 107, Chapter 325, Statutes of 2015.

<sup>27</sup> California Executive Order S-01-07, January 2007.

<sup>28</sup> CARB, *Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling*, Title 13 CCR section 2485.2004.

licensed to operate on highways, regardless of where they are registered. This measure prohibits diesel fueled commercial vehicles from idling for more than 5 minutes at any given location. While the goal of this measure is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from unnecessary idling.

### **Airborne Toxic Control Measure for Stationary Compression Ignition (CI) Engines**

In 2004, CARB adopted an Airborne Toxic Control Measure to reduce public exposure to diesel particulate matter emissions and criteria pollutant emissions from stationary diesel-fueled compression ignition (CI) engines.<sup>29</sup> The measure applies to any person who owns or operates a stationary CI engine in California with a rated brake horsepower greater than 50, or anyone who either sells, offers for sale, leases, or purchases a stationary CI engine. This measure outlines fuel and fuel additive requirements; emission standards; recordkeeping, reporting and monitoring requirements; and compliance schedules for CI engines.

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

In addition to limiting exhaust from idling trucks, in 2008, CARB approved the Truck and Bus regulation to reduce NO<sub>x</sub>, PM10, and PM2.5 emissions from existing diesel vehicles operating in California (13 CCR section 2025). The phased regulation aims to reduce emissions by requiring installation of diesel soot filters and encouraging the retirement, replacement, or retrofit of older engines with newer emission-controlled models. The phasing of this regulation has full implementation by 2023.

### **California Environmental Quality Act**

Under CEQA,<sup>30</sup> EIRs are required to include a discussion of the potential significant energy impacts of projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. If the analysis of a project shows that the project may result in significant environmental effects due to wasteful, inefficient, or unnecessary use of energy, or wasteful use of energy resources, then the EIR must identify mitigation measures to address that energy use. This analysis should include the project energy use for all project phases and components, including transportation-related energy, during construction and operation. In addition to building code compliance, other relevant considerations may include, among others, the project size, location, orientation, equipment use and any renewable energy features that could be incorporated into the project.<sup>31</sup> CEQA Guidelines, Appendix F, provides a list of energy-related topics that should be analyzed in the EIR.

<sup>29</sup> CARB, *Airborne Toxic Control*, Title 17 CCR section 93115, 2004.

<sup>30</sup> CEQA, PRC section 21100(b)(3).

<sup>31</sup> CEQA Guidelines section 15126.2(b).

### 4.5.3.3 Regional Regulations and Directives

#### *Southern California Association of Governments*

The SCAG 2020–2045 Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS)<sup>32</sup> is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals, with a specific goal of achieving an 8 percent reduction in passenger vehicle GHG emissions on a per capita basis by 2020, 19 percent reduction by 2035, and 21 percent reduction by 2040 compared to the 2005 level. Although the RTP/SCS is not technically an energy efficiency plan, consistency with the RTP/SCS has energy implications, including the reduction of VMT which reduces GHG emissions and has the co-benefit of reducing fossil fuel consumption from travel to and from a project.

### 4.5.3.4 Local Regulations and Directives

#### *Inglewood General Plan*

The City General Plan does not contain any policies, regulations, or directives that specifically address energy resources.

There are no goals and policies in the General Plan that directly address energy demand and conservation. However, the following goals from the Land Use Element of the City General Plan are relevant to transportation-related energy demand and conservation.<sup>33</sup>

**Circulation Goal:** Promote and support adequate public transportation within the City and the region.

**Circulation Goal:** Develop a safe and adequate pedestrian circulation system which is barrier free for the handicapped.

#### *Inglewood Energy and Climate Action Plan*

The City adopted an Energy and Climate Action Plan<sup>34</sup> (ECAP) in 2013 to guide Citywide GHG emissions reduction efforts. The ECAP established four primary compliance paths which projects may choose to adhere to, including: ministerial and exempt project status, implementation of a combination of sustainable development standards, performance-based compliance, or payment of an in-lieu fee. These measures were developed on a points-based system, which were chosen because they have been

<sup>32</sup> Southern California Association of Governments (SCAG), *Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Adopted Final*, "Chapter 1," <https://scag.ca.gov/connect-social> Accessed September 28, 2021.

<sup>33</sup> City of Inglewood, Department of Community Development and Housing, 1980. *Land Use Element of the Inglewood General Plan*. January 1980. Amended September 14, 2016.

<sup>34</sup> City of Inglewood, *Inglewood Energy and Climate Action Plan*, March 2013, <https://www.cityofinglewood.org/DocumentCenter/View/148/Inglewood-Energy-and-Climate-Action-Plan-ECAP-Adopted-2013-PDF>, Accessed September 28, 2021.

demonstrated by various studies to directly reduce GHG emissions or support changes in activities that lead to GHG emissions reductions. Each Climate-Ready Development Standard has a point value associated with it that reflects its general effectiveness at reducing GHG emissions. The standards apply to various types of projects, and a qualifier is included denoting which types of projects may implement the standard. Applicants have discretion regarding which measures that they would want their project to comply with; however, for a project to be fully compliant with the goals of the ECAP it must incorporate features meeting the standards sufficient to accrue a total of 20 points. The ECAP contains the following:

- **Emissions Inventory:** Expands the City's 1990, 2005, and 2007 greenhouse gas inventory to include an inventory of 2010 emissions. The ECAP also includes a year 2010 inventory of electricity and natural gas consumed.
- **Emissions Reduction Target/Goal:** Establishes a 2020 emissions reduction target of 15 percent below 2005 levels and a 2035 emission reduction goal of 32.5 percent below 2005 levels.
- **Emission Reduction Strategies:** The ECAP contains energy and greenhouse gas emissions reduction strategies. Particular attention is provided to budget-neutral measures that will reduce the community-wide energy consumption and greenhouse gas emissions in order to meet the statewide emissions targets identified in the ARB's Scoping Plan and Executive Order S-03-05.
- **Implementation Program:** Identifies the timeline for implementing each strategy, relative cost, and any additional analysis and/or legislative action needed.
- **Streamlined CEQA Review:** The ECAP serves as a tiering document for the streamlined review of project-level greenhouse gas emissions under CEQA for projects proposed within the City's jurisdiction.

#### *Inglewood Energy Efficiency Climate Action Plan*

The City developed an Energy Efficiency Climate Action Plan<sup>35</sup> (EECAP) in December 2015 that evaluates both energy and GHG emissions. In addition, the Inglewood EECAP is a roadmap for achieving community-wide energy and GHG emissions reductions that encourages the City to grow more sustainably. The EECAP includes the following: an energy and GHG emissions inventory, reduction target/goal, reduction and efficiency strategies, and an implementation program. The EECAP sets forth six general goals for community GHG reduction: (1) increase energy efficiency in existing residential units, (2) increase energy efficiency in new residential development, (3) increase energy efficiency in existing commercial units, (4) increase energy efficiency in new commercial development, (5) increase energy efficiency through water efficiency, and (6) decrease energy demand through reducing urban heat island effect. Additionally, the EECAP sets forth four general goals for municipal GHG reduction: (1) participate in education, outreach,

<sup>35</sup> City of Inglewood, *Energy Efficiency Climate Action Plan*, December 2015, [https://www.southbaycities.org/sites/default/files/EECAP\\_Inglewood\\_Final\\_20151218.pdf](https://www.southbaycities.org/sites/default/files/EECAP_Inglewood_Final_20151218.pdf). Accessed September 28, 2021.

and planning for energy efficiency, (2) increase energy efficiency in municipal buildings, (3) increase the energy efficiency in city infrastructure, (4) reduce energy consumption in the long term.

### Other Local Conservation Initiatives

The Southern California Edison Company (SCE) and SoCalGas provide several programs for energy customers in Inglewood to conserve energy. Programs include Consumer Rebate Programs, a Refrigerator Turn-In and Recycling Program, Green Power Program, Outdoor Area Lighting Program, Solar Power Incentives, Power Quality Consulting Programs, and Electric Vehicle Programs. Programs include Commercial Lighting Efficiency Offer (CLEO), Heating, Ventilation and Air Conditioning (HVAC) Rebate Program, Customer Generation Rebate, Technical Assistance Program, Premium Efficiency Motors (PEM) Program, Chiller Efficiency Program, Energy Load Monitoring (ELM) Program, and Financing Programs. Programs for nonresidential customers include rebates on energy efficient HVAC systems and refrigeration equipment, customer generation rebates, energy-load monitoring, energy-efficiency financing, and solar power initiatives.

## 4.5.4 EXISTING CONDITIONS

### 4.5.4.1 Electricity

Electrical power within the City is supplied by SCE, which serves approximately 15 million people in a 50,000-square-mile service area.<sup>36</sup> The SCE service area used approximately 64,564,000 MWh of electricity in 2019.<sup>37</sup> SCE produces and obtains electricity from various generating sources that utilize coal, nuclear, natural gas, hydroelectric, and renewable resources to generate power.

In 2012, the latest year of publicly available data, the City consumed a total of approximately 434,308 MWh of electricity, an approximately 16 percent reduction from 2005.<sup>38</sup> Based on building type, single- and multifamily residential units consumed the most electricity at approximately 164,000 MWh, followed by industrial at 62,000 MWh, and commercial at approximately 24,000 MWh.<sup>39</sup> This compares with the total amount of built space for each building type, with multifamily residential units constituting the greatest square footage, followed by single-family residential, commercial, other, industrial, condominium

- 36 Southern California Edison, "Newsroom Fact Sheet," April 29, 2019, [https://newsroom.edison.com/internal\\_redirect/cms.ipressroom.com.s3.amazonaws.com/166/files/20193/SCE%20Service%20Area%20Fact%20Sheet\\_Ver2\\_04252019.pdf](https://newsroom.edison.com/internal_redirect/cms.ipressroom.com.s3.amazonaws.com/166/files/20193/SCE%20Service%20Area%20Fact%20Sheet_Ver2_04252019.pdf). Accessed September 28, 2021.
- 37 Southern California Edison, "Electric Company ESG/Sustainability Quantitative Information," November 4, 2019, <https://www.edison.com/content/dam/eix/documents/sustainability/2019-eix-esg-pilot-quantitative-section-sce.pdf>. Accessed September 28, 2021.
- 38 South Bay Cities Council of Governments, *Supplemental Energy Climate Action Plan: City of Inglewood*, 2018, <https://www.southbaycities.org/sites/default/files/Inglewood%20CAP.pdf>. Accessed September 28, 2021.
- 39 City of Inglewood, *Energy Efficiency Climate Action Plan*, December 2015, [http://www.southbaycities.org/sites/default/files/EECAP\\_Inglewood\\_Final\\_20151218.pdf](http://www.southbaycities.org/sites/default/files/EECAP_Inglewood_Final_20151218.pdf). Accessed September 28, 2021.

residential, institutional, and mixed building types. The SCE estimates that electricity consumption within its planning area will be approximately 122,500 GWh annually by 2027.<sup>40</sup>

In Downtown Inglewood's residential neighborhoods, existing electrical facilities consist of an overhead electrical system, including poles carrying low voltage conduits along with telecommunication and cable TV facilities. In most of the commercial and industrial areas in the Inglewood Downtown area, the existing electrical networks are underground within all the streets.<sup>41</sup>

### 4.5.4.2 Natural Gas

SoCalGas is the natural gas purveyor within the City. The SoCalGas service area reaches 21.8 million consumers through 5.9 million meters in more than 500 communities, covering an area of approximately 24,000 square miles throughout Central and Southern California.<sup>42</sup>

In 2012, the latest year of publicly available data, the City consumed a total of approximately 1,900 MMcf per year.<sup>43</sup> Based on building type, single- and multifamily residential units consumed the most natural gas at approximately 1,363 MMcf in 2012, a 4.2 percent reduction from 2005. Commercial and industrial uses consumed approximately 536 MMcf in 2012, a 16.8 percent reduction from 2005.<sup>44</sup> This compares with the total amount of built space for each building type, with multifamily residential units constituting the greatest square footage, followed by single-family residential, commercial, other, industrial, condominium residential, institutional, and mixed building types.

The SoCalGas planning area had an available natural gas capacity of 3,175 million cubic feet (MMcf) in 2020.<sup>45</sup> Natural gas capacity within SoCalGas' planning area is anticipated to be approximately 3,435 MMcf per day (or 1,253,775 million MMcf per year) in 2027, which is the opening year of the proposed Project.<sup>46</sup>

SoCalGas projects total gas demand to decline at an annual rate of 1 percent from 2020 to 2035.<sup>47</sup> The decline in demand is due to modest economic growth, and CPUC-mandated energy efficiency (EE) standards and programs and SB 350 goals. Other factors that contribute to the downward trend are tighter

- 40 CEC, Demand Analysis Office, *California Energy Demand 2018-2030 Revised Forecast*, <https://efiling.energy.ca.gov/getdocument.aspx?tn=223244>. Accessed September 28, 2021.
- 41 John M. Cruikshank Consultants, Inglewood Planning Services for Transit Oriented Development, *Existing Infrastructure Baseline Data*, June 30, 2015.
- 42 SCG, "Company Profile," <https://www.socalgas.com/about-us/company-profile>. Accessed September 28, 2021.
- 43 City of Inglewood, *Energy Efficiency Climate Action Plan*.
- 44 City of Inglewood, *Energy Efficiency Climate Action Plan*.
- 45 California Gas and Electric Utilities, *2020 California Gas Report*, [https://www.socalgas.com/sites/default/files/2020-10/2020\\_California\\_Gas\\_Report\\_Joint\\_Utility\\_Biennial\\_Comprehensive\\_Filing.pdf](https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf). Accessed September 28, 2021.
- 46 California Gas and Electric Utilities, *2020 California Gas Report*, [https://www.socalgas.com/sites/default/files/2020-10/2020\\_California\\_Gas\\_Report\\_Joint\\_Utility\\_Biennial\\_Comprehensive\\_Filing.pdf](https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf). Accessed September 28, 2021.
- 47 The California Gas and Electric Utilities, *2018 California Gas Report*, "Gas Demand," 36.

standards created by revised Title 24 Codes and Standards, renewable electricity goals, a decline in core commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). By comparison, the 2018 California Gas Report projected an annual decline in demand of 0.74 percent over the forecast horizon.

#### 4.5.4.3 Petroleum-Based Fuel (Transportation Energy)

Crude oil is a mixture of hydrocarbons that exists as a liquid in underground geologic formations and remains a liquid when brought to the surface.<sup>48</sup> Petroleum products are produced from the processing of crude oil and other liquids and include transportation-related fuels such as gasoline and diesel. Petroleum is a worldwide commodity. According to the US Energy Information Administration (EIA), California consumed approximately 681,893,000 barrels (28,639,506,000 gallons, or 42 gallons per barrel) in 2019, the most recent year of publicly available data.<sup>49</sup> The EIA forecasts the national supply and demand in its Annual Energy Outlook 2021.<sup>50</sup> The EIA forecasts a national oil supply of 19.9 million barrels per day (mb/d) in 2027, which is the opening year for the proposed Project.<sup>51</sup> This equates to approximately 7,264 million barrels per year (mb/y) or 305,067 million gallons per year (mg/y).<sup>52</sup>

Recent data shows that the transportation sector accounts for a majority of California's petroleum consumption.<sup>53</sup> In 2019, the most recent year of publicly available data, California consumed approximately 565,056,000 barrels (23,732,352,000 gallons, or 42 gallons per barrel) of petroleum for transportation.<sup>54</sup>

Over the last several decades, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs emissions from the transportation sector, and reduce vehicle travel. Incentive programs, such as the CEC's Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP), are helping the

48 U.S. Energy Information Administration (EIA), "Frequently Asked Questions," <https://www.eia.gov/tools/faqs/faq.php?id=40&t=6>. Accessed September 28, 2021.

49 U.S. EIA, *Independent Statistics & Analysis*, "Table F16: Total Petroleum Consumption Estimates," 2019, [https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep\\_fuel/html/fuel\\_use\\_pa.html&sid=US](https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_use_pa.html&sid=US). Accessed September 28, 2021.

50 U.S. EIA, *Annual Energy Outlook 2021*, <https://www.eia.gov/outlooks/aeo/>. Accessed September 28, 2021.

51 U.S. EIA, *Annual Energy Outlook 2021*, "Table 11. Petroleum and Other Liquids Supply and Disposition," <https://www.eia.gov/outlooks/aeo/data/browser/#/?id=11-AEO2021&cases=ref2021~aeo2020ref&sourcekey=0>. Accessed September 28, 2021.

52 One oil barrel is equivalent to 42 gallons.

53 U.S. EIA, *Independent Statistics & Analysis*, "Table F16: Total Petroleum Consumption Estimates," 2019, [https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep\\_fuel/html/fuel\\_use\\_pa.html&sid=US](https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_use_pa.html&sid=US). Accessed September 28, 2021.

54 U.S. EIA, *Independent Statistics & Analysis*, "Table F16: Total Petroleum Consumption Estimates," 2017, [https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep\\_fuel/html/fuel\\_use\\_pa.html&sid=US](https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_use_pa.html&sid=US). Accessed September 28, 2021.

State to reduce its dependency on gasoline. The CEC predicts that the demand for gasoline will continue to decline over the upcoming years, and there will be an increase in the use of alternative fuels.<sup>55</sup>

#### 4.5.4.4 Existing Energy Use Within the Project Footprint

The proposed Project is located within a developed area which utilizes energy supply for a variety of land uses. There are several existing developments which contribute to existing electricity demand that would be demolished as part of the proposed Project.

The proposed Project would require a number of full and partial property acquisitions and easements or leases for construction and operation of the guideway, stations, MSF, and other support facilities included in the proposed Project. These existing uses currently generate electricity and natural gas demand for building operation. **Table 4.5-1: Annual Energy Demand of Existing Uses within the Proposed Project Footprint** lists the existing energy demand for the existing uses that would be demolished as part of the proposed Project.

**Table 4.5-1**  
**Annual Energy Demand of Existing Uses within the Proposed Project Footprint**

Parcel No.	Property Address	Existing Use	Square Footage	Annual Energy Demand	Units
<i>Electricity</i>					
4015-027-030	310 E. Florence Ave	Restaurant	1,200 SF	43,776	kWh/yr
4015-027-031	300 E. Florence Ave	Restaurant	4,762 SF	173,645	kWh/yr
4015-027-032	254 N. Market St	Restaurant	4,608 SF	168,100	kWh/yr
4015-027-033	250 N. Market St	Auto Service	44,000 SF	371,800	kWh/yr
4015-027-038	240 N. Market St	Shopping Center	12,300 SF	140,712	kWh/yr
4015-027-040	230 N. Market St	Store	22,194 SF	253,854	kWh/yr
4015-027-041	224 N. Market St	Store	5,000 SF	57,200	kWh/yr
4015-027-049	222 N. Market St	Shopping Center	25,500 SF	291,720	kWh/yr
4015-027-050	210 N. Market St	Shopping Center	7,348 SF	84,084	kWh/yr
4021-010-015	150 S. Market St	Store	16,575 SF	189,561	kWh/yr
4021-024-015	500 E. Manchester Blvd	Supermarket	76,402 SF	2,950,570	kWh/yr
4021-024-015	510 E. Manchester Blvd	Gas Station	202 SF	1,707	kWh/yr
4021-036-049	401 S. Prairie Ave	Office	28,029 SF	392,126	kWh/yr
4024-008-015	923 S. Prairie Ave	Store	9,744 SF	111,471	kWh/yr
4024-009-005	945 S. Prairie Ave	Office	8,357 SF	116,914	kWh/yr
4024-009-007	1003 S. Prairie Ave	Office	5,522 SF	77,253	kWh/yr
4024-009-015	1011 S. Prairie Ave	Office	1,098 SF	15,361	kWh/yr

55 CEC, *Final 2019 Integrated Energy Policy Report*, <https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2019-integrated-energy-policy-report>. Accessed September 28, 2021.

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Parcel No.	Property Address	Existing Use	Square Footage	Annual Energy Demand	Units
4024-009-033	1035 S. Prairie Ave	Shopping Center	26,288 SF	300,048	kWh/yr
4024-009-028	1035 S. Prairie Ave	Restaurant	3,954 SF	144,242	kWh/yr
	—	Water Conveyance	—	605,070	kWh/yr
<b>Electricity Total</b>				<b>6,489,214</b>	<b>kWh/yr</b>
<b>Natural Gas</b>					
4015-027-030	310 E. Florence Ave	Restaurant	1,200 SF	311,184	kBTU/yr
4015-027-031	300 E. Florence Ave	Restaurant	4,762 SF	1,234,360	kBTU/yr
4015-027-032	254 N. Market St	Restaurant	4,608 SF	1,194,950	kBTU/yr
4015-027-033	250 N. Market St	Auto Service	44,000 SF	919,600	kBTU/yr
4015-027-038	240 N. Market St	Shopping Center	12,300 SF	24,600	kBTU/yr
4015-027-040	230 N. Market St	Store	22,194 SF	44,380	kBTU/yr
4015-027-041	224 N. Market St	Store	5,000 SF	10,000	kBTU/yr
4015-027-049	222 N. Market St	Shopping Center	25,500 SF	51,000	kBTU/yr
4015-027-050	210 N. Market St	Shopping Center	7,348 SF	14,700	kBTU/yr
4021-010-015	150 S. Market St	Store	16,575 SF	33,140	kBTU/yr
4021-024-015	500 E. Manchester Blvd	Supermarket	76,402 SF	1,570,020	kBTU/yr
4021-024-015	510 E. Manchester Blvd	Gas Station	202 SF	4,222	kBTU/yr
4021-036-049	401 S. Prairie Ave	Office	28,029 SF	256,185	kBTU/yr
4024-008-015	923 S. Prairie Ave	Store	9,744 SF	19,488	kBTU/yr
4024-009-005	945 S. Prairie Ave	Office	8,357 SF	76,383	kBTU/yr
4024-009-007	1003 S. Prairie Ave	Office	5,522 SF	50,471	kBTU/yr
4024-009-015	1011 S. Prairie Ave	Office	1,098 SF	10,036	kBTU/yr
4024-009-033	1035 S. Prairie Ave	Shopping Center	26,288 SF	52,456	kBTU/yr
4024-009-028	1035 S. Prairie Ave	Restaurant	3,954 SF	1,025,350	kBTU/yr
<b>Natural Gas Total</b>				<b>6,902,525</b>	<b>kBTU/yr</b>

Source: Refer to Appendix J.1 for detailed calculations.

Notes: kWh/yr = kilowatt-hours per year; kBTU/yr = thousand British Thermal Units per year.

Electricity and natural gas for the existing uses is total yearly operational usage.

As shown, the existing uses currently consume approximately 6,489,214kWh of electricity per year. Moreover, the existing uses currently consume 6,902,525thousand British thermal units (kBTU) (or 6.7 MMcf)<sup>56</sup> of natural gas per year.

4.5.5 ADJUSTED BASELINE

This section assumes the Adjusted Baseline Environmental Setting as described in Section 4.0, 4.0.5: Adjusted Baseline. Specifically, operation of land uses included in the Hollywood Park Specific Plan (HPSP) would result in the consumption of energy resources such as electricity, natural gas, and transportation

56 The conversion of kBTU to cubic feet uses the factor of 1 cf to 1.037 kBTU.

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fuels. Similar to the proposed Project, the HPSP would utilize SCE and SoCalGas for electricity and natural gas supplies and infrastructure. As such, SCE and SoCalGas would be responsible for providing adequate electricity and natural gas supplies for the HPSP project. Moreover, the HPSP would increase the number of vehicles traveling to and from the HPSP site, thus increase the consumption of transportation related fuels. Table 4.5-2: Adjusted Baseline Annual Energy Demand shows the Adjusted Baseline energy demand for electricity and natural gas.

Table 4.5-2  
Adjusted Baseline Annual Energy Demand

Land Use	Square Footage	Annual Energy Demand	Units
<b>Electricity</b>			
General Office	466,000 SF	6,519,340	kWh/yr
Apartments	314,000 SF	1,248,240	kWh/yr
Retail	518,080 SF	5,926,840	kWh/yr
Water Conveyance	—	2,813,125	kWh/yr
<b>Electricity Total</b>		<b>16,507,545</b>	<b>kWh/yr</b>
<b>Natural Gas</b>			
General Office	466,000 SF	4,259,240	kBTU/yr
Apartments	314,000 SF	3,588,220	kBTU/yr
Retail	518,080 SF	1,036,160	kBTU/yr
<b>Natural Gas Total</b>		<b>8,883,620</b>	<b>kBTU/yr</b>

Source: Refer to Appendix J.1 for detailed calculations.

Notes: kWh/yr = kilowatt-hours per year; kBTU/yr = thousand British Thermal Units per year.

Electricity and natural gas for the existing uses is total yearly operational usage.

As shown, the Adjusted Baseline conditions would consume approximately 16,507,545 kWh of electricity per year and 8,883,620 kBTU (or 8.6 MMcf)<sup>57</sup> of natural gas per year. Vehicle fuel usage for the Adjusted Baseline is discussed further under Impact E-1.

57 The conversion of kBTU to cubic feet uses the factor of 1 cf to 1.037 kBTU.

#### 4.5.6 THRESHOLDS OF SIGNIFICANCE

Criteria outlined in Appendix G of the CEQA Guidelines were used to determine the level of significance of energy impacts. A project would have a significant impact in relation to energy if it were to:

**Threshold E-1:** Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.

**Threshold E-2:** Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

#### 4.5.7 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

**Impact E-1:** Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?

The proposed Project includes Design Guidelines and a Construction Commitment Program (CCP) as described in **Section 3.0**. The CCP addresses temporary effects during construction of the Project. The Design Guidelines describe the design features of the proposed Project.

##### 4.5.7.1 Project Design Features

The proposed Project includes the following features that address the energy related consumption during construction and operation of the ATS:

###### PDF EN-1

- **Energy Efficiency** - Where California Energy Efficiency Standards apply, the project should be more energy efficient than allowed. For energy-using equipment not governed by California Energy Efficiency Standards, best available energy efficient technologies should be used. Advanced commissioning of building systems should be conducted to ensure systems are operating as designed.

To achieve energy use reduction, passive strategies taking advantage of the favorable local climate should be considered where feasible. The use of solar canopies as shade structures in addition to roof-mounted solar is another energy saving strategy.

- **Water Efficiency** - In order to reduce excessive water consumption, the project should identify and implement appropriate opportunities to reduce or eliminate potable water use indoors and in landscape areas.

- **Material Conservation And Resource Efficiency** - In order to reduce the environmental impact from the use of construction materials, the project should minimize the use of virgin materials. This can be accomplished by increasing the use of materials that are reused, recycled, rapidly renewable, locally sourced, and durable. In order to determine the best approach to reducing the overall environmental impact from use of materials, a life cycle assessment (LCA) could be used.
- **Environmental Quality** - In order to protect and enhance the health and comfort of occupants, the project should provide a high quality, sustainable indoor environment that is designed to maximize natural daylighting and views of the outdoors where feasible. Indoor spaces should use high efficiency air filtration and should create a comfortable indoor acoustical environment. Materials and systems should be selected that will provide for a healthy indoor environment.

Implementation of the proposed Project will require the consumption of energy resources during both construction and operation.

For construction impacts, the City would include in bid documents for the proposed Project language specifying that the contractors shall use Tier 4 construction equipment or equivalent (see **PDF AQ-1** in the CCP). For operational impacts, the proposed Project would comply with the requirements of CALGreen<sup>58</sup> and be consistent with the City Energy Efficiency Climate Action Plan<sup>59</sup> involving policies and programs related to sustainability, energy efficiency, and reduction in GHG emissions. In addition, the Design Guidelines, contained in **Appendix C**, include sustainability guidelines that provide green measures to be incorporated into the design and operations of the ITC facilities. The proposed Project will be designed and constructed to achieve Silver Award Certification under the Envision™ Sustainable Infrastructure Rating System or equivalent.

###### Construction

Prior to construction of the proposed Project, reconstruction of the existing Vons store, which is proposed for demolition to accommodate the construction of the MSF, is proposed on the corner of Manchester Boulevard and Hillcrest Boulevard. This proposed replacement Vons store would include amenities similar to the existing store, including a pharmacy and bank branch. **Table 4.5-3: Energy Use During Vons Replacement Construction** below shows the transportation related fuel associated with construction of the Vons store replacement. It is assumed electricity would be provided by diesel fueled generators during building construction. As shown in **Table 4.5-3**, the construction of the Vons store replacement would consume a total of 19,436 gallons of petroleum. Consumption of energy resources for construction of the Vons store replacement would be temporary and would occur prior to construction of the proposed Project.

<sup>58</sup> California Green Building Standards Code (CCR, Title 24, Part 11 - CALGreen).

<sup>59</sup> City of Inglewood, Energy Efficiency Climate Action Plan, December 2015.

**Table 4.5-3**  
**Energy Use During Vons Replacement Construction**

Fuel Type	Gallons
Diesel	16,471
Gasoline	2,965
<b>Total</b>	<b>19,436</b>

Source: Refer to **Appendix J.1** for detailed calculations

During construction of the proposed Project, energy would be consumed in the form of electricity for powering the construction trailers (lights, electronic equipment, and heating and cooling) and exterior uses, such as lights, water conveyance for dust control, and other construction activities. Construction would also consume energy in the form of petroleum-based fuels associated with on and off-road construction equipment and vehicles, construction workers' travel to and from the proposed Project, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). As discussed below, construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas.

#### **Electrical Demand**

During construction, electricity would be consumed to power lighting, heating, and cooling in the construction trailers, outdoor lighting of the proposed Project, electric equipment, and supply and convey water for dust control. SCE would supply electricity and would be obtained from the existing electrical lines that connect to the proposed PDS substations. As shown in **Table 4.5-4: Total Electricity Use During Proposed Project Construction**, a total of approximately 165,115 kWh of electricity is estimated to be consumed during construction of the proposed Project.

**Table 4.5-4**  
**Total Electricity Use During Proposed Project Construction**

Fuel Type	Quantity
<b>Electricity</b>	
Water Conveyance	95,165 kWh
Construction Trailers	69,950 kWh
<b>Total</b>	<b>165,115 kWh</b>

Source: Refer to **Appendix J.1** for detailed calculations.

For comparison, the average annual electricity consumption for a U.S. residence is 10,972 kWh.<sup>60</sup> Although there is a temporary increase in electricity consumption during construction, the electrical consumption would be within the supply and infrastructure capabilities of SCE which estimates electricity consumption within its planning area will be approximately 120,000 GWh annually by 2024, which is the first year of construction.<sup>61</sup>

The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. Electricity use from construction would be short-term, limited to working hours, used for necessary construction-related activities, and represent a small fraction of the proposed Project's operational electricity. Furthermore, the electricity used for off-road light construction equipment would reduce the amount of harmful construction-related air pollutant and GHG emissions because they would not rely on more traditional construction-related energy in the form of diesel fuel which generates emissions. As such, the proposed Project would not result in inefficient, or unnecessary consumption of electricity resources during construction.

Electrical energy demands during construction would be less than significant.

#### **Natural Gas**

Construction activities do not typically involve the consumption of natural gas, as construction equipment and staging rely heavily on electricity and transportation fuels. Accordingly, natural gas would likely not be needed to support construction activities; thus, there would be little to no demand generated by construction. As such, the proposed Project's would not result in inefficient, or unnecessary consumption of natural gas energy resources during construction.

Natural gas energy demands during construction would be less than significant.

#### **Transportation Fuel**

Construction of the proposed Project would result in the irretrievable commitment of construction materials (e.g., steel products, cement, glass). While construction would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment, the consumption of fossil fuels would occur on a temporary basis during the construction period.

<sup>60</sup> U.S. EIA, *Frequently Asked Questions*, "How much electricity does an American home use?" <https://www.eia.gov/tools/faqs/faq.php?id=97&t=3>. Accessed September 28, 2021.

<sup>61</sup> CEC, Demand Analysis Office, *California Energy Demand 2018-2030 Revised Forecast* <https://efiling.energy.ca.gov/getdocument.aspx?tn=223244>. , Accessed September 28, 2021.

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As shown in **Table 4.5-5: Total Vehicle Fuel Use During Proposed Project Construction**, the 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. The EIA forecasts a national oil supply of 20.18 million barrels (mb) per day in 2024, which is the first year of construction.<sup>62</sup> This equates to approximately 7,366 mb per year or 309,360 million gallons (mg) per year. Although construction would result in the consumption of petroleum-based fuels, it would be within the EIA supply forecast and would be temporary in nature.

As discussed previously, the proposed Project includes a CCP which addresses temporary effects during construction of the proposed Project. The CCP includes **PDF AQ-1** which would require more fuel-efficient construction equipment. Additionally, construction of the proposed Project would employ fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations in accordance with the CARB Pavley Phase II standards,<sup>63</sup> the anti-idling regulation in accordance with section 2485 in Title 13 of the CCR,<sup>64</sup> and fuel requirements for stationary equipment in accordance with section 93115 (concerning Airborne Toxic Control Measures) in Title 17 of the CCR.<sup>65</sup> Use of construction equipment that is compliant with these regulations would result the use of more fuel-efficient engines and associated fuel savings.

**Table 4.5-5  
Total Vehicle Fuel Use During Proposed Project Construction**

Source	Petroleum Consumption (Gallons)	
	Morning/Evening Shift	Morning/Night Shift
Off-Road Construction Equipment	2,082,283	2,108,818
On-Road Construction Equipment	161,419,382	148,312,451
Worker Vehicles	233,206	233,206
Delivery Vehicles <sup>a</sup>	0	348,356
<b>Maximum Total</b>	<b>163,734,871</b>	<b>151,002,831</b>

Source: Refer to **Appendix J.1** for detailed calculations.

<sup>a</sup> Delivery of construction materials would occur during the night shift.

62 U.S. EIA, *Annual Energy Outlook 2021*, "Table 11. Petroleum and Other Liquids Supply and Disposition," <https://www.eia.gov/outlooks/aeo/data/browser/#/?id=11-AEO2021&cases=ref2021~aeo2020ref&sourcekey=0>. Accessed September 28, 2021.

63 California Air Resources Board, *Low-Emissions Vehicle Program*, <https://ww2.arb.ca.gov/node/2930/about>. Accessed September 28, 2021.

64 Title 13 CCR, Section 2485, [https://ww2.arb.ca.gov/sites/default/files/classic/msprog/truck-idling/13ccr2485\\_09022016.pdf](https://ww2.arb.ca.gov/sites/default/files/classic/msprog/truck-idling/13ccr2485_09022016.pdf). Accessed September 28, 2021.

65 Airborne Toxic Control Measures, Title 17 CCR, Section 93115, [https://ww2.arb.ca.gov/sites/default/files/classic/diesel/documents/finalreg2011.pdf?\\_ga=2.201342804.479047022.1596146954-1722362475.1583193018](https://ww2.arb.ca.gov/sites/default/files/classic/diesel/documents/finalreg2011.pdf?_ga=2.201342804.479047022.1596146954-1722362475.1583193018). Accessed September 28, 2021.

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The proposed Project would divert mixed construction and demolition debris to City-certified construction and demolition waste processors using City-certified waste haulers, consistent with State targets of 75 percent waste diversion by 2020. In addition, select building materials or products for permanent installation would be selected from sources within southern California area. The proposed Project would divert mixed construction and demolition debris to City-certified construction and demolition waste processors using City-certified waste haulers, which would reduce truck trips to landfills, and increase the amount of waste recovered (e.g., recycled, reused, etc.) at material recovery facilities, thereby further reducing transportation fuel consumption.<sup>66</sup>

Construction would utilize energy only for necessary on-site and off-site transportation-related activities, construction worker travel to and from the proposed Project, and to transport construction materials and demolition debris. Idling restrictions and the use of cleaner, energy-efficient equipment would result in less fuel combustion and energy consumption and thus minimize construction-related energy use. As such, the proposed Project would not result in inefficient, or unnecessary consumption of vehicle fuels during construction.

Transportation fuel demands during construction would be less than significant.

**Operation**

As discussed previously, reconstruction of the existing Vons store to be removed is proposed on the corner of Manchester Boulevard and Hillcrest Boulevard. **Table 4.5-6: Energy Use from Vons Replacement Operation** below shows the energy use associated with operation of the Vons replacement store.

**Table 4.5-6  
Energy Use from Vons Replacement Operation**

Source	Quantity
Electricity (kWh/yr)	1,742,391
Natural Gas (kBTU/yr)	953,520

Source: Refer to **Appendix J.1** for detailed calculations

66 Energy savings result from the avoidance of needing to mine and process virgin materials and then transport those materials to the project. As shown on MSS2 California Aggregates Map ([https://www.conservation.ca.gov/cgs/Documents/Publications/Map-Sheets/MS\\_052\\_California\\_Aggregates\\_Map\\_201807.pdf](https://www.conservation.ca.gov/cgs/Documents/Publications/Map-Sheets/MS_052_California_Aggregates_Map_201807.pdf)) Aggregate production areas in the Los Angeles areas include Irwindale and areas further away in Upland and Temescal Canyon areas in Orange County. Irwindale is a lesser producer of virgin aggregate as most of the mines have been depleted to their permitted limits. According to LA County ([https://dpw.lacounty.gov/epd/cd/cd\\_attachments/Recycling\\_Facilities.pdf](https://dpw.lacounty.gov/epd/cd/cd_attachments/Recycling_Facilities.pdf)) there are recycling facilities much closer that supply recycled aggregate and other construction materials to the region.

As shown in **Table 4.5-6**, the operation of the Vons store replacement would generate a demand of 1,742,391 kWh of electricity per year and 953,520 kBtu of natural gas per year.

**Electrical Demand**

Propulsion power (i.e., the power to run the train on a guideway) would be provided via two PDS substations located along the guideway alignment. Each PDS substation includes equipment to transform the medium- to high-voltage power feed provided from the power companies to the required 750-volt direct current (VDC) needed to power the vehicles and other ancillary equipment. The proposed Project’s operating components would utilize electrical energy for the operation of the related support features, such as the ATS trains, stations, and MSF via electricity from the two PDSs. For normal operations, the required load flow for power of the proposed Project would be divided between the two PDSs. One of the PDSs would be located on the MSF site. The second PDS would be located on the Prairie Avenue/Hardy Street station site. This includes operation of all interior and exterior lighting features included for the proposed Project. Power requirements for each PDS are provided in **Table 4.5-7: Proposed Project Normal Operation Load Flow**.

**Table 4.5-7  
Proposed Project Normal Operation Load Flow**

PDS Site	Peak Power (KW)	RMS Power (KW)	Average Power (KW)	RMS Current (A)
MSF	2,008	834	755	1,067
Prairie Avenue/Hardy Street station	2,119	777	639	996

Source: Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021. Table 9-2.  
Notes:  
KW – kilowatt  
RMS – The substation load calculation output provides both per second and root mean squared (RMS) KVA loads for each substation.

As shown, the proposed MSF PDS is estimated to have a peak power load flow of 2,008 kW, and the Prairie Avenue/Hardy Street station PDS is estimated to have a peak power load flow of 2,119 kW for a total of 4,127 kW.<sup>67</sup> The ATS trains would operate for 18 hours per day which would generate a total electricity demand of 74,286 kWh per day or 27,114,390 kWh (27.1 GWh) per year.<sup>68</sup>

In the event the MSF PDS is unable to operate, the Prairie Avenue/Hardy Street station PDS is estimated

67 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021.  
68 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021.

to have a peak power load of 4,152 kW which would generate a total electricity demand of 74,736 kWh per day or 27,278,640 kWh (27.3 GWh) per year. Similarly, in the event the Prairie Avenue/Hardy Street station PDS is unable to operate, the MSF PDS is estimated to have a peak power load of 4,353 kW which would generate a total electricity demand of 78,354 kWh per day or 28,599,210 kWh (28.6 GWh) per year.

The electrical demand from the existing land uses to be removed to implement the Project is 6,489,214 kWh per year. As noted previously, the Vons store replacement would use 1,742,391 kWh of electricity per year. As shown in **Table 4.5-8: Annual Electricity Use from Proposed Project Operation**, the electricity demand for the proposed Project during normal operation would result in a net increase of 22,367,567 kWh (22.4 GWh) per year. In the event the MSF PDS is unable to operate, the electricity demand would result in a net increase of 22,531,817 kWh (22.5 GWh) per year. In the event the Prairie Avenue/Hardy Street station PDS is unable to operate, the electricity demand would result in a net increase of 23,852,387 kWh (23.9 GWh) per year. Should any of the uses that would be removed to implement the Project relocate within the City, the net increase in energy shown in **Table 4.5-8** would be reduced but in no event would the amount of electricity required exceed the total shown for the ATS system.

**Table 4.5-8  
Annual Electricity Use from Proposed Project Operation**

Operation Scenario	Annual Electricity Usage (kWh/yr)		
	ATS System <sup>a</sup>	Existing <sup>b</sup>	Net Increase
Normal Operation	27,114,390	4,746,823	22,367,567
Prairie Avenue/Hardy Street station PDS Only	27,278,640	4,746,823	22,531,817
MSF PDS Only	28,599,210	4,746,823	23,852,387

Notes: kWh/yr = kilowatt-hours per year.  
<sup>a</sup> Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021.  
<sup>b</sup> Existing data accounts for operation of the Vons store replacement.

As further discussed in **Section 4.14: Utilities and Service Systems**, SCE completed a high-level Distribution Study to determine the amount of load that SCE could accommodate and required infrastructure upgrades in order to meet the proposed Project’s recommended full redundancy design.<sup>69</sup>

SCE’s analysis assumed the use of the existing single (nonredundant) 16 kva circuit currently available along Market Street as it may be the most likely used circuit for the proposed Project.

69 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021.

The results of SCE's analysis found that:<sup>70</sup>

- The maximum load that can be accommodated at the present time is 10 MVA.
- To accommodate the 10 MVA load with full redundancy, the following upgrades would be required:
  - 1,500 feet of new civil work/duct banks,
  - 1,860 feet of new 1000 JCN cable,
  - 1,700 feet of upgrading/re-cabling the existing SCE primary cable to 1000 JCN, and
  - Two new gas switches.

SCE would complete the aforementioned upgrades and would be subject to its procedures and requirements for construction and environmental clearance. The proposed Project would need to be reevaluated by SCE prior to coming online as the details are finalized as described in **MM UT-2 in Section 4.14**.

As further discussed below, the proposed Project would be designed in a manner that is consistent with relevant energy requirements, such as Title 24 and CALGreen, which are designed to encourage development that results in the efficient use of energy resources.

As such, the proposed Project would not result in inefficient, or unnecessary consumption of electricity during operation and electricity demands during operation would be less than significant.

#### Natural Gas

No new gas connections to serve the proposed Project elements would be required except at the proposed MSF. Natural gas would be used at the MSF to serve the pressure wash system, and for space and water heating. **Table 4.5-9: Annual Natural Gas Use During Proposed Project Operation** shows the operational natural gas estimates for the operation of the MSF and stations, as well as the net total of natural gas after taking into account the existing uses to be demolished.

As shown in **Table 4.5-9**, the MSF and stations would use approximately 2,340,800 kBTU (or 2.3 MMcf)<sup>71</sup> of natural gas per year. The natural gas demand from the existing land uses to be removed is 6,902,525 KBTU per year. The Vons store replacement would use 953,520 KBTU of natural gas per year. Therefore, the proposed Project would result in a net decrease of 3,608,205 kBTU of natural gas per year.

<sup>70</sup> Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021.

<sup>71</sup> The conversion of kBTU to cubic feet uses the factor of 1 cf to 1.037 kBTU.

Further, the proposed Project would be within the service capacity of SoCalGas which is anticipated to have an available capacity of approximately 3,435 MMcf of natural gas per day (or 1,253,775 million MMcf per year) in 2027, which is the opening year of the proposed Project<sup>72</sup> As discussed, the proposed Project would be designed in a manner that is consistent with building efficiency requirements including Title 24 and CALGreen. Increased building efficiency would help alleviate natural gas demand. Further, the proposed Project would incorporate a number of sustainability features as discussed in the Design Guidelines (**Appendix C**). Specifically, the proposed Project will be designed and constructed to achieve Silver Award Certification under the Envision™ Sustainable Infrastructure Rating System or equivalent. As such, the proposed Project would not result in inefficient, or unnecessary consumption of natural gas during operation.

**Table 4.5-9  
Annual Natural Gas Use During Proposed Project Operation**

Source	Units	Quantity
Stations	kBTU/yr	576,840
MSF	kBTU/yr	1,763,960
<b>Project Total</b>	kBTU/yr	<b>2,340,800</b>
<i>Existing Natural Gas<sup>a</sup></i>	kBTU/yr	5,949,005
<b>Net Natural Gas Total</b>	kBTU/yr	<b>(3,608,205)</b>

Notes: kBTU/yr = thousand British Thermal Units per year.

Source: See **Appendix J.1.1** for MSF operational natural gas usage.

<sup>a</sup> Existing data accounts for operation of the Vons store replacement.

Natural gas demands during operation would be less than significant.

#### Transportation Fuel

The proposed Project spans approximately 1.6 miles and would be located near existing land uses which generate vehicle trips on local roadways within the vicinity of the Project. The proposed Project would provide direct connections between the Los Angeles County Metropolitan Transportation Authority (Metro) K Line, and other transit providers as well as the City's major activity centers, such as the Forum, the Los Angeles Sports and Entertainment District (LASED) and the Inglewood Basketball and Entertainment Center. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce per-capita VMT. **Table 4.5-10: Annual VMT With and Without Proposed Project** presents the annual VMTs for the Adjusted Baseline, Future (2027), and Future (2045) scenarios.

<sup>72</sup> California Gas and Electric Utilities, *2020 California Gas Report*, [https://www.socalgas.com/sites/default/files/2020-10/2020\\_California\\_Gas\\_Report\\_Joint\\_Utility\\_Biennial\\_Comprehensive\\_Filing.pdf](https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf). Accessed September 28, 2021.

As shown in **Table 4.5-10**, implementation of the proposed Project would reduce annual VMTs under all scenarios. Specifically, under the Adjusted Baseline scenario, the proposed Project would reduce annual VMTs from 998,811,151 to 985,939,091, a decrease of 12,872,060. Under the Future (2027) Non-Event scenario, the proposed Project would reduce annual VMTs from 1,245,731,160 to 1,229,255,081, a decrease of 16,476,079. Under the Future (2027) All Event scenario, the proposed Project would reduce annual VMTs from 1,346,432,106 to 1,310,204,482, a decrease of 36,227,624. Under the Future (2045) Non-Event scenario, the proposed Project would reduce annual VMTs from 1,369,204,193 to 1,351,035,367, a decrease of 18,168,826. Under the Future (2045) All Event scenario, the proposed Project would reduce annual VMTs from 1,469,905,139 to 1,426,761,804, a decrease of 43,143,335.

**Table 4.5-10  
Annual VMT With and Without Proposed Project**

Scenario	Annual VMT		
	Without ITC	With ITC	Reduction
Adjusted Baseline	998,811,151	985,939,091	12,872,060
Future (2027) Non-Event	1,245,731,160	1,229,255,081	16,476,079
Future (2027) All Events	1,346,432,106	1,310,204,482	36,227,624
Future (2045) Non-Event	1,369,204,193	1,351,035,367	18,168,826
Future (2045) All Events	1,469,905,139	1,426,761,804	43,143,335

See **Section 4.12:Transportation** to this Recirculated Draft EIR for further discussion.

Petroleum usage from vehicle travel was calculated based on the projected annual VMTs provided previously. **Table 4.5-11: Annual Vehicle Fuel Use With and Without Proposed Project** below presents the annual petroleum consumption for the Adjusted Baseline, Future (2027), and Future (2045) scenarios.

As shown, implementation of the proposed Project would reduce annual petroleum-based fuel under all scenarios. Specifically, under the Adjusted Baseline scenario, the proposed Project would reduce annual fuel consumption from 45,338,712 gallons to 44,754,415 gallons, a decrease of 584,297 gallons. Under the Future (2027) Non-Event scenario, the proposed Project would reduce annual fuel consumption from 47,071,377 gallons to 46,448,809 gallons, a decrease of 622,567 gallons. Under the Future (2027) All Event scenario, the proposed Project would reduce annual fuel consumption from 50,876,477 gallons to 49,507,575 gallons, a decrease of 1,368,902. Under the Future (2045) Non-Event scenario, the proposed Project would reduce annual fuel consumption from 43,780,331 gallons to 43,199,383 gallons, a decrease of 580,949 gallons. Under the Future (2045) All Event scenario, the proposed Project would reduce annual fuel consumption from 47,000,246 gallons to 45,620,737 gallons, a decrease of 1,379,509 gallons.

**Table 4.5-11  
Annual Vehicle Fuel Use With and Without Proposed Project**

Scenario	Annual Fuel Consumption (gal)		
	Without ITC	With ITC	Reduction
Adjusted Baseline	45,338,712	44,754,415	584,297
Future (2027) Non-Event	47,071,377	46,448,809	622,567
Future (2027) All Events	50,876,477	49,507,575	1,368,902
Future (2045) Non-Event	43,780,331	43,199,383	580,949
Future (2045) All Events	47,000,246	45,620,737	1,379,509

Source: See **Appendix J.1** for fuel calculations.

Vehicles used for project-related vehicle trips would also comply as applicable with Pavley and Low Carbon Fuel Standards<sup>73</sup> which are designed to reduce vehicle GHG emissions, but would also result in fuel savings, in addition to compliance with CAFE standards. The proposed Project would support Statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles for the reasons discussed below. As discussed in detail in **Section 4.9: Land Use and Planning**, the proposed Project design and characteristics would be consistent with and would not conflict with the goals of the SCAG 2020-2045 RTP/SCS.<sup>74</sup> The 2020-2045 RTP/SCS provides a framework for member agencies to fund and implement regional transportation infrastructure improvements that benefit the region as a whole, including transit projects such as the one analyzed herein.

Additionally, the proposed Project would include up to two stationary standby generators with an estimated total capacity rated at approximately 4,000 kW to provide emergency power primarily for lighting and other emergency building systems. Emergency generators would utilize diesel fuel to operate during an emergency and for testing and maintenance. The generators would be required to comply with applicable federal emissions standards and Southern California Air Quality Management District (SCAQMD) Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines) which mandate emission limits and operating hour constraints. Specifically, each standby generator would operate for 2 hours per day during 25 days per year for a total of 50 hours per year. For emergency operation both generators would operate up to 2 hours each and could occur simultaneously. SCAQMD requires that all internal combustion engines (ICE) greater than 50 brake horsepower (bhp) and gas turbines greater than 2,975,000 Btu per hour obtain a permit to construct prior

73 California Air Resources Board, *Low-Emissions Vehicle Program*, <https://ww2.arb.ca.gov/node/2930/about>. Accessed September 28, 2021.

74 Southern California Association of Governments, *Connect SoCal – 2020 – 2045 RTP/SCS*, <https://www.connectsocial.org/Pages/What-Is-Connect-SoCal.aspx>. Accessed September 28, 2021.

#### 4.5 Energy Resources

to installation of the engines. The estimated annual fuel usage assuming each generator operates of 50 hours per year (2 hours per day) is 27,440 gallons of diesel fuel.<sup>75</sup>

The proposed Project would not result in inefficient, or unnecessary consumption of vehicle fuels during operation. Accordingly, vehicle fuel demands during operation would be less than significant.

#### Summary

Operation of the proposed Project would comply with all applicable building codes, including the 2019 Title 24 building energy efficiency standards,<sup>76</sup> CAFE fuel economy standards,<sup>77</sup> consistency with the SCAG 2020-2045 RTP/SCS,<sup>78</sup> compliance with the County's Low Impact Development (LID) Development Standards Manual,<sup>79</sup> compliance with the City's Low Impact Development Requirements for New Development and Redevelopment, the City's Green Street Policy,<sup>80</sup> the City's Water Conservation and Water Supply Shortage Program,<sup>81</sup> the Sustainability Guidelines included in the Design Guidelines, as described above, as well as mitigation measures included in this Recirculated Draft EIR, which would ensure that natural resources are used efficiently and conserved to the maximum extent possible.

The City has developed a set of broad sustainability strategies included as part of the Design Guidelines to be incorporated into the design, construction, and operations of each proposed Project component. These guidelines align with Inglewood's commitment to sustainability City-wide, as outlined in the City's Energy and Climate Action Plan and Energy Efficiency Climate Action Plan. These sustainability guidelines serve as a mechanism to promote the City's commitment to reduce its environmental footprint and promote energy efficient design requirements, water conservation and water quality improvement projects, natural resource protection efforts, waste reduction and recycling, and numerous air quality emissions reduction policies and programs.

For operational impacts, the proposed Project would comply with the requirements of California Green Building Standards Code (CALGreen) and be consistent with the City of Inglewood Energy Efficiency Climate Action Plan involving policies and programs related to sustainability, energy efficiency, and

75 Vender Specifications for Standby Generator, [https://www.cat.com/en\\_US/products/new/power-systems/electric-power.html](https://www.cat.com/en_US/products/new/power-systems/electric-power.html). Accessed September 28, 2021.

76 California Green Building Standards Code (CCR, Title 24, Part 11 - CALGreen).

77 NHTSA, *Corporate Average Fuel Economy*, <https://www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy>. Accessed September 28, 2021.

78 Southern California Association of Governments, *Final 2020-2045 RTP/SCS*, <https://scag.ca.gov/connect-socal>. Accessed September 28, 2021.

79 County of Los Angeles Department of Public Works, *Low Impact Development*, [https://pw.lacounty.gov/wmd/dsp\\_LowImpactDevelopment.cfm](https://pw.lacounty.gov/wmd/dsp_LowImpactDevelopment.cfm). Accessed September 28, 2021.

80 Inglewood Municipal Code, Chapter 10 Section 208, [http://www.qcode.us/codes/inglewood/view.php?topic=10-16-10\\_208&frames=off](http://www.qcode.us/codes/inglewood/view.php?topic=10-16-10_208&frames=off). Accessed September 28, 2021.

81 City of Inglewood, Ordinance No. 15-02, <https://www.cityofinglewood.org/DocumentCenter/View/1011/Ordinance-Number-15-02-PDF>. Accessed September 28, 2021.

#### 4.5 Energy Resources

reduction in GHG emissions. The City has committed to taking an active role in promoting energy conservation and environmentally-friendly initiatives to improve the environment and realize the benefits, which include energy independence, cost savings for energy not used, water saved, improved air quality, and public health benefits from improved air quality.

The City has an ongoing commitment to increasing energy efficiency and implementing energy conservation measures to reduce wasteful, inefficient, and unnecessary consumption. The proposed Project would incorporate a number of sustainability features as listed in **Section 3.0, 3.5.9**. The City has committed to implementing, if feasible, various sustainability measures for different proposed Project elements that meet or exceed CALGreen requirements, including energy and water conservation measures, for each of the follow proposed Project components: the guideway, stations, and the MSF. The sustainability strategies relate to planning and design; energy efficiency and renewable energy; water efficiency and conservation; materials conservation and resource efficiency; and environmental quality.

Further, it is expected that over time new technologies or systems will emerge, or will become more cost-effective or user-friendly, which will further reduce the reliance upon nonrenewable natural resources. For example, future implementation of the Clean Fuel Standard and the Renewable Portfolio Standard are expected to decrease the use of nonrenewable fossil fuels.

As stated in **Section 3.0**, the goals of the proposed Project include building new efficient transportation facilities that conserve energy, water, and other resources; and reducing traffic congestion and VMT. The components of the proposed Project would be required to meet the energy efficiency and conservation requirements of the California Green Building Standards Code<sup>82</sup> and the City Energy Efficiency Climate Action Plan.<sup>83</sup> Specifically, the proposed Project would incorporate the sustainability features included in the Design Guidelines, as described above.

Operation of the proposed Project would minimize the consumption of transportation fuels. Therefore, as proposed operation of the proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of electricity, natural gas, and transportation fuels, the proposed Project would not result in unjustified consumption of natural resources and impacts would be less than significant.

82 California Green Building Standards Code (CCR, Title 24, Part 11 - CALGreen)

83 City of Inglewood, *Energy Efficiency Climate Action Plan*, December 2015, [http://www.southbaycities.org/sites/default/files/EECAP\\_Inglewood\\_Final\\_20151218.pdf](http://www.southbaycities.org/sites/default/files/EECAP_Inglewood_Final_20151218.pdf). Accessed September 28, 2021.

**Mitigation Measures****Construction**

No mitigation is required.

**Operation**

No mitigation is required.

**Level of Significance after Mitigation****Construction**

Impacts related to energy use from implementation of the proposed Project would be less than significant.

**Operation**

Impacts related to energy use from implementation of the proposed Project would be less than significant.

**Impact E-2: Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?**

The proposed Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the County Green Building Code. Based on the below, the proposed Project would be consistent with adopted energy conservation plans and impacts would be less than significant.

**The Inglewood Energy and Climate Action Plan (ECAP)**

The ECAP<sup>84</sup> includes a business-as-usual (BAU) forecast that estimates future emissions in 2020 and 2035 from six sectors: Transportation, Residential Energy, Commercial/Municipal Energy, Industrial Energy, Solid Waste, and Water. The BAU forecast assumes a future under regulatory conditions as they existed in 2010, and it does not include the effects of updates to Title 24,<sup>85</sup> the Renewables Portfolio Standard,<sup>86</sup> and the Pavley Clean Car Standards<sup>87</sup> on future GHG emissions. Under the BAU forecast, total GHG emissions in Inglewood are expected to increase approximately 14 percent from 2010 (594,273 MTCO<sub>2e</sub>) to 2035 (678,283 MTCO<sub>2e</sub>). On a per service population basis, the increase is shown to be 4.5 percent, from 4.22

<sup>84</sup> City of Inglewood, *Energy Efficiency Climate Action Plan*, December 2015, [http://www.southbaycities.org/sites/default/files/EECAP\\_Inglewood\\_Final\\_20151218.pdf](http://www.southbaycities.org/sites/default/files/EECAP_Inglewood_Final_20151218.pdf). Accessed September 28, 2021.

<sup>85</sup> California Green Building Standards Code (CCR, Title 24, Part 11 - CALGreen).

<sup>86</sup> SB 1078, *Renewable Energy: California Renewables Portfolio Standard Program*.

<sup>87</sup> AB 1493, *Clean Car Standards – Pavley, California Air Resources Board, Low-Emissions Vehicle Greenhouse Gas Program*, <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/lev-program/low-emission-vehicle-greenhouse-gas>. Accessed September 28, 2021.

MTCO<sub>2e</sub>/SP in 2010 to 4.41 MTCO<sub>2e</sub>/SP in 2035. The GHG emissions reductions realized by State and local measures would be a direct result of energy efficiency upgrades aimed at increasing building energy performance, promoting renewable energy, and increasing vehicle fuel economy.

ECAP<sup>88</sup> implementation is expected to reduce emissions by 18.8 percent below 2005 levels by 2020, enabling the City to meet its 2005 target. However, the City would, need to reduce emissions by an additional 111,702 MT CO<sub>2e</sub> per year by 2035 to meet its 2035 target. The ECAP identifies a number of strategies aimed at reducing emissions through increased energy efficiency, renewable energy generation, improved transit options, and reduced consumption and waste. The ECAP includes energy reductions from the following implementing strategies and actions:

**Strategy 4: Improve Transportation Options and Manage Transportation Demand**

- Make roadways more efficient
- Improve transit
- Improve bicycle facilities
- Make parking more efficient
- Reduce commute trips
- Encourage land use intensification and diversity

ECAP implementation is expected to reduce emissions by 18.8 percent below 2005 levels by 2020, enabling the City to meet its 2005 target. However, the City would, need to reduce emissions by an additional 111,702 MT CO<sub>2e</sub> per year by 2035 to meet its 2035 target. The ECAP identifies a number of strategies aimed at reducing emissions through increased energy efficiency, renewable energy generation, improved transit options, and reduced consumption and waste.

The proposed Project would provide direct connections between the Metro K Line, and other transit providers as well as the City's major activity centers, such as the Forum, the LASED, HPSP and the IBEC. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce per-capita VMT.

The proposed Project would be consistent with the City ECAP.

Impacts would be less than significant.

<sup>88</sup> City of Inglewood, *Energy Efficiency Climate Action Plan*, December 2015, [http://www.southbaycities.org/sites/default/files/EECAP\\_Inglewood\\_Final\\_20151218.pdf](http://www.southbaycities.org/sites/default/files/EECAP_Inglewood_Final_20151218.pdf). Accessed September 28, 2021.

### CALGreen Code and Title 24

The proposed Project would be designed in a manner that is consistent with relevant energy conservation plans designed to encourage development that results in the efficient use of energy resources. The proposed Project would incorporate the sustainability features as contained in the Design Guidelines, as described above. Specifically, the proposed Project will be designed and constructed to achieve Silver Award Certification under the Envision™ Sustainable Infrastructure Rating System or equivalent.

Electricity would be required for water conveyance to the proposed Project. As such, reducing water consumption would reduce electricity demand for water conveyance. Water demand indoors and outdoors would be reduced through numerous measures that meet or exceed CalGreen requirements.<sup>89</sup> Recycled water would be used for landscape irrigation, toilet flushing, or car or train washing, water would be filtered and reused as wash and rinse water for train cars in the MSF. Once initial plants are established, xeriscape landscape would be implemented to utilize no-water irrigation, and drought-tolerant plants would be watered via drip irrigation. Low flow faucets and low flow flush fixtures would be implemented throughout the proposed Project design, and the best available water efficiency technologies would be used for cooling towers. Drainage systems designs would manage and capture any stormwater runoff to the maximum extent feasible through, in order of priority, infiltration, evapotranspiration, capture and use, and treatment with a high removal efficiency biofiltration/ biotreatment system.

As such, the proposed Project would comply with CALGreen and Title 24 requirements<sup>90</sup> to reduce energy consumption by implementing energy efficient building designs, reducing indoor and outdoor water demand, and installing energy-efficient appliances and equipment.

### SCAG 2020-2045 RTP/SCS

The proposed Project would be consistent with the 2020-2045 RTP/SCS.<sup>91</sup> The SCAG RTP/SCS is designed to support development of compact communities in existing urban areas with more mixed-use and infill development, and reuse developed land that is also accessible to transit and/or served by high quality transit. The 2020-2045 RTP/SCS builds on the foundation of the 2016-2040 RTP/SCS by adapting its goals to a changing region, mainly focusing on leveraging new transportation technologies for more efficient travel, improving mobility and accessibility, and increasing the movement of people and diversification of choice within the transportation system.

Overall, the Project would be consistent with the goals and policies of the SCAG 2020-2045 RTP/SCS because it supports reductions in VMT to and from the proposed Project. Although the 2020-2045 RTP/SCS

<sup>89</sup> California Green Building Standards Code (CCR, Title 24, Part 11 - CALGreen)

<sup>90</sup> California Green Building Standards Code (CCR, Title 24, Part 11 - CALGreen)

<sup>91</sup> Southern California Association of Governments, *Connect SoCal – 2020 – 2045 RTP/SCS*, <https://www.connectsocial.org/Pages/What-Is-Connect-SoCal.aspx>. Accessed September 28, 2021.

is not an energy efficiency plan, consistency with the 2020-2045 RTP/SCS has energy implications, including the reduction of VMT from the plan which reduces GHG emissions and reduces fossil fuel consumption from travel to and from the implementation of the proposed Project.

Impacts would be less than significant.

### Summary

The proposed Project would incorporate a number of sustainability features as listed in **Section 3.0, 3.5.9**. The City has committed to implementing various sustainability measures for different proposed Project elements that meet or exceed CALGreen requirements, including energy and water conservation measures, for each of the follow proposed Project components: the guideway, stations, and the MSF. As such, it would be consistent with applicable plans, policies and regulations adopted for the purpose of promoting renewable energy and overall energy efficiency.

Impacts would be less than significant.

### Mitigation Measures

#### Construction

No mitigation is required.

#### Operation

No mitigation is required.

### Level of Significance after Mitigation

#### Construction

Implementation of the proposed Project would be consistent with the applicable plans; impacts would be less than significant.

#### Operation

Implementation of the proposed Project would be consistent with the applicable plans; impacts would be less than significant.

### 4.5.8 CUMULATIVE IMPACTS

Implementation of the proposed Project, including the related projects identified in **Section 4.0, 4.0.6: Cumulative Assumptions** would further increase demands for energy and may require the construction or relocation of related supply facilities. Each project will require site specific assessment to determine any impacts to existing energy or conservation.

### Electricity

As discussed previously, electricity within the City is supplied by SCE. The geographic scope for cumulative electricity impacts is SCE's electricity service area. There are approximately 304 related projects that would be within the same service area as the proposed Project. Development of the proposed Project and related projects could cumulatively increase demands on the existing electricity supply. However, each project will require a site-specific assessment to determine any impacts to existing and forecasted electricity supply. Specifically, all related projects would be required to assess construction and operational electricity usage and coordinate with SCE prior to project approval. Further, like the proposed Project, other related projects would be required to incorporate energy conservation features in order to comply with applicable mandatory regulations including CALGreen and State energy standards in Title 24, and incorporate mitigation measures, as necessary. Therefore, cumulative impacts related to electrical infrastructure would be less than significant.

### Natural Gas

As discussed previously, SoCalGas is the natural gas purveyor within the City. The geographic scope for cumulative natural gas impacts is SoCalGas' service area. There are approximately 395 related projects that would be within the same service area as the proposed Project. Development of the proposed Project and related projects could cumulatively increase demands on the existing natural gas supply. However, each project will require a site-specific assessment to determine any impacts to existing and forecasted natural gas supply. Specifically, all related projects would be required to assess construction and operational natural gas usage and coordinate with SoCalGas prior to project approval. Further, like the proposed Project, other related projects would be required to incorporate energy conservation features in order to comply with applicable mandatory regulations including CALGreen and State energy standards in Title 24, and incorporate mitigation measures, as necessary. Therefore, cumulative impacts related to natural gas infrastructure would be less than significant.

### Transportation Fuel

The geographic scope for cumulative transportation fuel impacts is the SCAG region. Buildout of the proposed Project and other transit and transit-oriented-development projects in the SCAG region would be expected to decrease overall VMT, as a result of the use of the ATS trains by people, rather than using vehicles for travel to the area. The effect on transportation fuel demand by other cumulative projects would be reduced by future improvements to vehicle fuel economy pursuant to Federal and State regulations. By 2025, vehicles are required to achieve 54.5 mpg (based on USEPA measurements), which is a 54 percent increase from the 35.5 mpg standard in the 2012–2016 standards. Cumulative development projects would need to demonstrate consistency with these goals and incorporate any mitigation measures required under CEQA, which would also ensure cumulative development projects contribute to

transportation energy efficiency. Therefore, cumulative impacts related to transportation fuels would be less than significant.

### 4.5.9 CONSISTENCY WITH CITY OF INGELWOOD GENERAL PLAN

The City's General Plan does not contain any policies, regulations, or directives that specifically address energy resources. However, the following circulation goals from the Land Use Element of the City General Plan are relevant to transportation-related energy demand and conservation.<sup>92</sup>

**Circulation Goal:** Promote and support adequate public transportation within the City and the region.

**Circulation Goal:** Develop a safe and adequate pedestrian circulation system which is barrier free for the handicapped.

The proposed Project would promote and support adequate public transportation within the City and the region. The proposed Project is a public transit project by design, connecting future riders to the Metro K Line and solving the problem of the last mile connection to various activity centers throughout the City. The proposed Project would decrease overall VMT as a result of the ridership in lieu of automobile use to and from the City activity centers. Decrease in VMT would result in more efficient energy use and a reduction in vehicle fuel usage and GHG emissions.

The proposed Project would develop a safe and adequate pedestrian circulation system which is barrier free for the handicapped. For example, all station mezzanine levels would provide connectivity to elevated passenger walkways for traveling over existing roadways. The elevated passenger walkways would be designed to improve both pedestrian access and comfort between the stations and the City in addition to providing multimodal access to adjacent bus facilities, pick-up and drop-off areas, and other adjacent resources. The proposed Project would also upgrade existing sidewalks to ensure consistent Americans with Disabilities Act appliance along the transit corridor. As such, the proposed Project would be consistent with the City General Plan goals relevant to transportation-related energy demand and conservation as discussed under **Impact E-2**.

<sup>92</sup> City of Inglewood, Department of Community Development and Housing, 1980. *Land Use Element of the Inglewood General Plan, January 1980*. Amended September 14, 2016.

## 4.6 GEOLOGY AND SOILS

### 4.6.1 INTRODUCTION

This section of the Recirculated Draft Environmental Impact Report (Recirculated Draft EIR) evaluates the impacts of the proposed Inglewood Transit Connector Project (proposed Project or ITC Project) related to seismicity and paleontological resources.<sup>1</sup> Information from the following reports is incorporated into this section:

- *Fault Rupture Hazard Evaluation in Support of Draft EIR (Fault Rupture Hazard Evaluation)*, Geosyntec Consultants, September 27, 2019 (**Appendix K.1: Fault Rupture Study**);
- *Development of Seismic Design Criteria in Support of Draft EIR (Seismic Design Criteria)*, Geosyntec Consultants, June 26, 2019 (**Appendix K.2: Seismic Design Criteria**); and
- *Inglewood Transit Connector, Technical Memorandum, Geology and Soils*, Geosyntec Consultants, June 25, 2018 (**Appendix K.3: Technical Memorandum, Geology and Soils**).

Prior to the preparation of the December 2020 Draft EIR, a Revised Initial Study (included in **Appendix A.2**), was prepared using the California Environmental Quality Act (CEQA) Environmental Checklist to assess potential environmental impacts associated with geology and soils. Four screening thresholds were found to result in “Less than Significant Impacts,” and two thresholds would result in “No Impact.” Thus, these topics are not analyzed further in this Recirculated Draft EIR:

- Impacts related to the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction, were evaluated, and determined to be less than significant. The location of the proposed Project is not within an area known to be susceptible to liquefaction.<sup>2</sup>
- Impacts related to the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides, were evaluated, and determined to have no impact. The location of the proposed Project is not within a designated earthquake-induced landslide zone known to the California Geological Survey (CGS). Further, the lack of general elevation difference in the area would limit the risk of seismically induced landslides occurring, nor does the proposed Project substantially alter the existing topography of the area.<sup>3</sup>
- Impacts related to substantial soil erosion or the loss of topsoil were evaluated and determined to be less than significant. The proposed Project shall be subject to a Storm Water Pollution Prevention Plan

<sup>1</sup> Paleontological Resources Assessment Report, Inglewood Basketball and Entertainment Center, City of Inglewood, California, ESA, May 2019.

<sup>2</sup> Inglewood Transit Connector, *Technical Memorandum, Geology and Soils*, Geosyntec Consultants, June 25, 2018. See **Appendix K.3**.

<sup>3</sup> Inglewood Transit Connector, *Technical Memorandum, Geology and Soils*, Geosyntec Consultants, June 25, 2018. See **Appendix K.3**.

(SWPPP) in accordance with the National Pollutant Discharge Elimination System (NPDES). Compliance with construction-related best management practices (BMPs), as detailed in the SWPPP, would control, and minimize erosion and siltation.<sup>4</sup>

- Impacts related to location on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse were evaluated and determined to be less than significant. United States Geological Survey (USGS) groundwater data note that groundwater is at least 85 feet below ground surface. Dewatering, an activity that contributes to subsidence and ground collapse, would not be necessary for the proposed Project. The proposed Project design and construction would be required to adhere to all applicable building codes and standards ensuring that impacts related to geological failure—including lateral spreading, off-site landslides, liquefaction, or collapse would be less than significant.<sup>5</sup>
- Impacts related to location on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property were evaluated and determined to be less than significant. The proposed Project’s design and construction would incorporate construction practices to maintain the integrity of building and support structures and would comply with all applicable building codes and standards.<sup>6</sup>
- No impacts would result from soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. The proposed Project would connect to the City’s existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems.<sup>7</sup>

After circulation of the December 2020 Draft EIR for public review, the City revised the design of the Project in response consultation with key stakeholders in the community and comments received on the December 2020 Draft EIR. Specific changes to the proposed Project include raising the height of the ATS guideway along Market Street to preserve existing views of historic buildings, relocating the Prairie Avenue/Pincay Drive Station to the southwest corner of Prairie Avenue and Manchester Boulevard, redesign of the proposed MSF to allow this facility to be located on the proposed site with a new Vons store, and realignment of the guideway and stations on Prairie Avenue to the west side of Prairie Avenue. As it relates to impacts to geology and soils, impacts would remain less than significant with mitigation similar to the December 2020 Draft EIR.

<sup>4</sup> Inglewood Transit Connector, *Technical Memorandum, Geology and Soils*, Geosyntec Consultants, June 25, 2018. See **Appendix K.3**.

<sup>5</sup> Inglewood Transit Connector, *Technical Memorandum, Geology and Soils*, Geosyntec Consultants, June 25, 2018. See **Appendix K.3**.

<sup>6</sup> Inglewood Transit Connector, *Technical Memorandum, Geology and Soils*, Geosyntec Consultants, June 25, 2018. See **Appendix K.3**.

<sup>7</sup> Inglewood Transit Connector, *Technical Memorandum, Geology and Soils*, Geosyntec Consultants, June 25, 2018. See **Appendix K.3**.

These changes to the design of the Project do not create the potential for significant impacts related to liquefaction, seismically induced landslides, erosion and/or loss of topsoil. These changes also do not create the potential for significant impacts related to geologic failure including lateral spreading, off-site landslides, or collapse, as described above. The revised Project would not be located on expansive soils, nor would it require alternative wastewater disposal systems.

Impacts found to be less than significant are further discussed in **Section 6.0: Other Environmental Considerations**.

#### 4.6.2 METHODOLOGY

The evaluation of potentially significant impacts related to seismicity as a result of the proposed Project is based on a review of existing conditions and a review of geotechnical reports prepared for the proposed Project. To ascertain the existing conditions, published USGS geological maps were reviewed, and geologic and geotechnical records were obtained from publicly available online resources, including municipalities and agencies with jurisdiction near the Project area including Los Angeles County Department of Public Works, LA Metro, Caltrans, and City of Inglewood (City) Building and Safety Division. Various database searches were performed using USGS and CGS to compile available documents and incorporate relevant information into this assessment. No site reconnaissance, geologic mapping, subsurface, or site-specific investigations were performed.

The evaluation of the potential for paleontological resources to be located within the Project alignment and impacts to these resources is based on a paleontological report prepared for a project in the vicinity of the proposed Project area.<sup>8</sup>

Existing seismic conditions and paleontological resources near the Project are described, and the regulatory framework that guides the evaluation of the proposed Project are provided. Direct and/or indirect Project impacts that would result from Project implementation are then identified, along with any measures to mitigate potentially significant impacts, as necessary.

#### 4.6.3 REGULATORY FRAMEWORK

Federal, State, and local laws, regulations, and policies pertaining to geology and soils provide the regulatory framework for addressing aspects of seismic and geotechnical conditions that would be affected by development of the proposed Project. The following is a summary of key applicable regulations related to potential seismic and geotechnical conditions.

<sup>8</sup> DEIR Appendix I: Paleontological Resources Report, *Inglewood Basketball and Entertainment Center Project*, December 2019, [http://ibecproject.com/I\\_PaleontologicalResourcesReport.pdf](http://ibecproject.com/I_PaleontologicalResourcesReport.pdf).

#### 4.6.3.1 Federal Regulations

##### ***Earthquake Hazards Reduction Act***

The U.S. Congress passed the Earthquake Hazards Reduction Act in 1977<sup>9</sup> to reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards reduction program.

To accomplish this goal, the act established the National Earthquake Hazards Reduction Program (NEHRP);<sup>10</sup> this program was substantially amended in November 1990 by the NEHRPA,<sup>11</sup> which refined the description of agency responsibilities, program goals, and objectives. Focusing on research, building code standards, technical guidance, and education, NEHRP is a collaborative effort among the Federal Emergency Management Agency (FEMA), the National Institute of Standards and Technology (NIST), the National Science Foundation (NSF), and the USGS.

#### 4.6.3.2 State Regulations

##### ***Alquist-Priolo Earthquake Fault Zoning Act***

The purpose of the Alquist-Priolo Earthquake Fault Zoning Act is to identify hazards associated with surface fault ruptures and to prevent the construction of buildings on active faults.<sup>12</sup> Alquist-Priolo earthquake fault zones (APEFZ) are regulatory zones surrounding the surface traces of active faults in California. Wherever an active fault exists, if it has the potential for surface rupture, a structure for human occupancy cannot be placed over the fault and must be a minimum distance from the fault, generally fifty feet. Earthquake fault zones were conceived in the Alquist-Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act). The intent of the Alquist-Priolo Act is to reduce property and life losses from surface fault rupture.

The State Geologist is required to establish and map zones around the surface traces of active faults, which are then distributed to county and city agencies to be incorporated into their land use planning and construction policies. Proposed development needs to be proven through geologic investigation to not be located across active faults before a city or county can permit the implementation of projects. If an active fault is found, development for human occupancy is prohibited within a 50-foot setback, or a distance demonstrated to be appropriate by the geologic investigation, from the identified fault.

<sup>9</sup> National Earthquake Hazards Reduction Program Reauthorization Act of 2004, Public Law 95-124, 42 U.S.C. 7701 et. seq., as amended by Public Laws 101-614, 105-47, 106-503, and 108-360.

<sup>10</sup> Earthquake Hazards Reduction Act of 1977, As Amended by Section 5. Earthquake Hazards Reduction Program [New Section 103 in Public Law 108-360]

<sup>11</sup> Earthquake Hazards Reduction Program Reauthorization Act of 1990 (P.L. 101-614)

<sup>12</sup> California State Alquist-Priolo Earthquake Fault Zoning Act of 1972. California Public Resources Code, sec. 2621.5.

### **Seismic Hazards Mapping Act**

The Seismic Hazards Mapping Act is a State law that requires delineated maps to be created by the California State Geologist to reflect where potential ground shaking, liquefaction, or earthquake-induced landslides may occur.<sup>13</sup> The purpose of the Seismic Hazards Mapping Act is to protect the public from the effects of nonsurface fault rupture earthquake hazards, inducing strong ground shaking, liquefaction, seismically induced landslides, or other ground failure caused by earthquakes. City, County, and State agencies are required to use seismic hazard maps in their land use decision making. Projects within seismic hazard zones are required to have site-specific geotechnical investigations and incorporate appropriate mitigation measures identified as a result. The State has published guidelines for evaluating and mitigating seismic hazards.<sup>14</sup>

### **California Building Code, California Code of Regulations**

The 2019 California Building Code (CBC) was published July 1, 2019, with an effective date of January 1, 2020. It is administered by the California Building Standards Commission (CBSC).<sup>15</sup> The CBC governs all development within the State of California, as amended and adopted by each local jurisdiction. These regulations include provisions for site work, demolition, and construction, which include excavation and grading, as well as provisions for foundations, retaining walls, and expansive and compressible soils. The CBC provides guidelines for building design to protect occupants from seismic hazards.

### **California Department of Transportation (Caltrans)**

The California Department of Transportation (Caltrans) Division of Engineering Services (DES) is the lead project delivery organization for the design, construction, and oversight of bridge and other transportation structures. DES is a comprehensive, multidisciplinary engineering organization committed to providing quality products and services in a timely manner. DES has prepared numerous guidance documents for use in the design and construction of bridges and structures to address geologic conditions. These guidance documents include the two Memorandums (Memos) to Designers, described below, applicable to the design of the proposed Project. These memos define the factors to be addressed in fault investigations completed as part of the structural design process.

<sup>13</sup> California Public Resources Code, sec. 2690–2699.6 Seismic Hazards Mapping Act.

<sup>14</sup> California Division of Mines and Geology Special Publication 117, 1997; revised and readopted in 2008 by the California Geologic Survey.

<sup>15</sup> 2019 California Building Standards Code (Cal. Code Regs., Title 24) published July 1, 2019.

### **Caltrans Memo to Designers 20-8 (Analysis of Ordinary Bridges that Cross Faults)**

Caltrans Memo to Designers 20-8 (Analysis of Ordinary Bridges that Cross Faults) dated January 2013, provides specific guidance for the design of bridges that cross active earthquake faults.<sup>16</sup>

Memo to Designers (MTD) 20-8 states that although a few exceptions exist, the fault rupture hazard is only required for Holocene faults<sup>17</sup> identified by the California Geologic Survey in APEFZ maps.

The memo states that when a bridge or similar structure crosses a fault that falls within a mapped APEFZ, the design is to take into account the displacement demand resulting from a fault offset, dynamic response due to ground shaking, and any other fault-induced hazards, such as creep, which may occur. MTD 20-8 defines a method for determining the potential displacement at columns and abutments at fault crossings to support designing structures to respond to these conditions.

### **Caltrans Memo to Designers 20-10 (Fault Rupture)**

Caltrans Memo to Designers 20-10 (Fault Rupture),<sup>18</sup> dated January 2013, provides guidance for the design of bridge type structures to address the potential fault rupture where any portion of a structure falls within an APEFZ, where any portion of a structure falls within 330 feet of well-mapped active faults, or within 1,000 feet of a fault not located in an APEFZ may require further study.<sup>19</sup>

This memo identifies changes to design required for bridges and similar structures when crossing a fault to address potential fault rupture effects. MTD 20-10 supplements the defined method described in MTD 20-08 above for determining the potential displacement at columns and abutments at fault crossings and designing the structures so to slide at the abutment, bent, or hinge seats points without failing.

### **Public Resources Code Section 5097.5 and Section 30244**

Paleontological resources are limited, nonrenewable resources of scientific, cultural, and educational value that are afforded protection under state laws and regulations. The following section summarizes the applicable federal and state laws and regulations, as well as professional standards provided by the Society of Vertebrate Paleontology (SVP).

PRC Section 5097.5 and Section 30244 include state requirements for paleontological resource management. These statutes prohibit the removal of any paleontological site or feature from public lands without permission of the jurisdictional agency, define the removal of paleontological sites or features as

<sup>16</sup> Caltrans LRFD, Memo to Designers 20-8, Analysis of Ordinary Bridges that Cross Faults, January 2018.

<sup>17</sup> Holocene faults are less than 10,000 years old.

<sup>18</sup> Caltrans LRFD, Memo to Designers 20-10, Fault rupture, January 2013.

<sup>19</sup> In such instances, the memo states that if further study of the fault rupture is needed, then procedures as outlined in CGS Note 49 shall be followed. <https://www.conservation.ca.gov/cgs/Documents/Publications/CGS-Notes/CGS-Note-49.pdf>.

a misdemeanor, and require reasonable mitigation of adverse impacts to paleontological resources from developments on public (State, county, city, district) lands.

#### 4.6.3.3 Local Regulations

##### **City of Inglewood General Plan Safety Element**

The General Plan Safety Element<sup>20</sup> is designed to ensure that the citizens of Inglewood can be protected from unreasonable risks caused by natural and manmade disasters. The City's goals are to minimize the dangers associated with natural and manmade hazards by implementing standards, regulations and laws that would reduce loss of life, injuries and property damage resulting from disasters, and to provide for the continuity of government operations and civilian life during and after a major disaster.

It is a general policy of the City to provide appropriate services and support to combat any disasters, and to protect the citizenry from significant adverse impacts arising from any disasters. Policies of the City's General Plan "Safety Element"<sup>21</sup> applicable to geology, soils, and seismicity include the following:

**Policy 1 Provide measures to reduce seismic impact.**

- Ensure that all potentially hazardous buildings are reinforced or demolished.
- Restrict new structures for human occupancy from being constructed across active faults.
- Require geological and soils engineering investigations in high risk fault areas.
- Use the latest State-approved edition of the Uniform Building Code and other applicable seismic design information.
- Periodically review subdivision requirements and other codes to improve requirements for safety and seismic safety as new information becomes available.
- Study the need for a seismic overlay zone to restrict certain types of development.
- Require a soils report for new buildings, as well as obtaining or utilizing, when available, geologic drillings or studies, local ground subsidence and elevation studies, geologic-seismic studies, strong motion monitoring, gathering, compiling, and interpreting local and regional geologic seismic data as it becomes available.
- Maintain the tagging system used to identify buildings damaged in an earthquake.
- Ensure that the Centinela Adobe historic site and any historical sites identified in the future be seismically reinforced.

<sup>20</sup> City of Inglewood General Plan, "Safety Element" (1995).

<sup>21</sup> City of Inglewood General Plan, "Safety Element" (1995).

##### **City of Inglewood Municipal Code**

###### **Municipal Code Chapter 11, Article 2 Building Code.**

The Inglewood Municipal Code<sup>22</sup> has incorporated the most up to date California Building Code in Chapter 11, Sections 11-2 to 11-5. These include ordinances referencing applicable standards and documentation requirements found in the California Building Code that address seismic safety and include the California Building Code, 2019 Edition, Volumes 1 and 2, based on the International Building Code, 2018 Edition, including the Appendix Chapters B, H, I, J and L, "Uniform Housing Code, 1997 Edition," and the "Uniform Code for the Abatement of Dangerous Buildings, 1997 Edition.

###### **Municipal Code Chapter 11, Article 13 Earthquake Hazard Reduction in Existing Buildings**

This section of the City's Municipal Code Chapter 11, Sections 11-130 to 11-138<sup>23</sup> promotes public safety and welfare by reducing the risk of death or injury that may result from the effects of earthquakes on unreinforced masonry-bearing-wall buildings constructed prior to 1934, or any unreinforced masonry building located in the City. The municipal code sets forth the minimum standards for structural seismic resistance established primarily to reduce the risk of life loss or injury and provides systematic procedures and standards or identification and classification of unreinforced masonry-bearing-wall buildings based on their present use. Priorities, time periods and standards are also established under which these buildings are required to be structurally analyzed and anchored. Where the analysis finds deficiencies, this code requires the building to be strengthened or demolished. In addition, qualified historical buildings are required to comply with the State Historical Building Code.<sup>24</sup>

#### 4.6.4 EXISTING CONDITIONS

##### 4.6.4.1 Regional Geology

The proposed Project is located within the central portion of the Los Angeles Basin, south of the Santa Monica Mountains, near the intersection of the Peninsular Ranges and Transverse Ranges geomorphic provinces of southern California. The Peninsular Ranges province is characterized by a series of northwest trending mountains and valleys separated by faults associated with, and subparallel to, the San Andreas Fault system. These rocks were intruded by Cretaceous-age (65 million years ago [mya]) granitic basement rocks, also known as the Peninsular Ranges Batholith. The Transverse Ranges are characterized by east-west trending structural features such as the Santa Monica Mountains and the Santa Monica and

<sup>22</sup> City of Inglewood, *Municipal Code*, "Chapter 11, Article 2 Building Code, Sections 11-2 through 11-5. California Building Code. Established and Additions, Deletions and Amendments."

<sup>23</sup> City of Inglewood, *Municipal Code*, "Chapter 11, Article 13 Earthquake Hazard Reduction in Existing Buildings, Sections 11-130 to 11-138."

<sup>24</sup> California Administrative Code, State Historical Building Code per Part 8, Title 4.

Hollywood faults. The Santa Monica and Hollywood faults are considered the boundary between these two physiographic provinces (the Peninsular Range province and Transverse Range province).

The Los Angeles Basin is a northwest-trending alluviated lowland plain filled with thick deposits of relatively unconsolidated marine and nonmarine sediments bounded by the Santa Monica Mountains to the north; the Elysian, Repetto and Puente Hills to the east; the Santa Ana Mountains and San Joaquin Hills to the south and southeast; and the Pacific Ocean to the west. The relatively flat surface of the Los Angeles Basin slopes gently south and is interrupted by locally trending northwest alignment of low hills and mesas to the south and west that extend from Newport Beach northwest to Beverly Hills, and the Palos Verdes Peninsula at the southwest extremity.

The Los Angeles Basin began forming during the Late Miocene (approximately 7.2 mya) as a result of subsidence following compressional stresses between the right-oblique Whittier and Palos Verdes fault zones, and the left-oblique Santa Monica fault system. Sedimentary deposits within the Los Angeles Basin are estimated to range in thickness from approximately 32,000 feet to 35,000 feet within the general vicinity of the proposed Project.

#### **Subsurface Conditions**

Previous geotechnical investigations within the vicinity of the proposed Project were reviewed. These explorations along with published geologic maps indicate that recent Pleistocene-age alluvium forms the surficial cover within the vicinity, often with thin localized layers of artificial fill associated with previous development activities. The anticipated geologic materials in the Project area are described in the following sections.

#### **Artificial Fill**

Artificial fill was encountered during previous investigations within the vicinity of the proposed Project extending up to 2 feet below ground surface (bgs) and generally consisted of brown to dark brown sandy silt, characterized as slightly moist and soft to medium stiff. Potential fill underlying the Project alignment is likely the result of grading or construction activities associated with previous development and may vary in composition and thickness.

#### **Alluvial Fan Deposits**

Geologic maps of the area describe relatively small portions of the area as underlain by late Pleistocene-age alluvial fan sediments of granitic sand. These alluvial fan deposits (Qae) typically consist of unconsolidated to weakly consolidated sands, silts, clays, and/or mixtures thereof (sandy silts, silty sands,

etc.). These materials are generally derived from material shed off the nearby Santa Monica Mountains. The thickness of the alluvial fan deposits is likely variable in the Project alignment.

#### **Older Alluvium**

Most of the Project area is underlain by relatively older late Pleistocene-age alluvium (Qoa). The older alluvial deposits consist of sediments that were mainly shed from the Santa Monica Mountains to the north. Composition of the older alluvial deposits primarily consists of slightly consolidated deposits of silts, clays, sands, and sandy gravel, and/or mixtures thereof (e.g., sandy silts and silty sands). Similar to the alluvial fan deposits, thickness of the older alluvium materials is likely to vary in the Project alignment but would extend to depths below the anticipated development associated with the proposed Project.

#### **4.6.4.2 Seismic Setting**

The tectonic setting of the Los Angeles Basin area is dominated by right-lateral strike-slip faults with a general northwest by southeast trend as a result of the interaction between the Pacific and North American lithospheric plates. Numerous faults in southern California include “active,” “potentially active,” and “inactive” faults. Division of these major groups are based on criteria by CGS for the Alquist-Priolo Earthquake Fault Zoning Program. By definition, an “active” fault is one that has had displacement within Holocene time (last 11,000 years). A “potentially active” fault has demonstrated displacement of Quaternary-age deposits (last 1.6 million years). “Inactive” faults have not exhibited displacement in the last 1.6 million years.<sup>25</sup>

Faults of tectonic significance mapped in the Los Angeles region and the historical earthquake epicenters in the region include the Santa Monica fault zone (SMFZ) to the north and northwest; the Newport-Inglewood fault zone (NIFZ) to the east and west; and the Cabrillo, Redondo Canyon, and Palos Verdes faults offshore to the west and southwest. Faults considered active and their respective distances from the Project and maximum moment magnitudes are presented in **Table 4.6-1: Significant Seismic Sources Near the Project**.

<sup>25</sup> Faults are currently categorized as Holocene-active, age-undetermined, and pre-Holocene according to Earthquake Fault Zones, California Geological Survey’s Special Publication 42, Section 5, rev. 2018.

**Table 4.6-1**  
**Significant Seismic Sources Near the Project**

Fault or Fault Segment	Fault Type <sup>1</sup>	Approximate Slip Rate (mm/yr) <sup>2</sup>	Dip Direction <sup>3</sup>	Approximate Fault Length (km) <sup>4</sup>	Approximate Closest Distance to Project (km) <sup>5</sup>	Approximate Maximum Magnitude (Mw) <sup>6</sup>
Newport-Inglewood (onshore)	RL	1.0	—	65	0.20	7.2
Santa Monica	O/LL, R	1.0	N	28	13	6.6
Hollywood	O/LL, R	1.0	N	17	14	6.4
Raymond	O/LL, R	1.5	N	22	21	6.8
Malibu Coast	O/LL, R	0.3	N	38	36	6.7
Palos Verdes	RL	3.0	—	99	21	7.3
Sierra Madre	R	2.0	N	57	32	7.2
Whittier	RL	2.5	NE	46	31	7.0
Elsinore	RL	5.0	V	38	65	6.8
San Andreas (Mojave section)	RL	30.0	V	99	68	7.1

Source: Geosyntec, *The Inglewood Transit Connector, Technical Memorandum, Geology and Soils, 2018.*

Notes:

"—" Unspecified

1 - RL = Right Lateral Strike-Slip Fault; LL = Left Lateral Strike-Slip Fault; O/LL = Oblique Left-Lateral Fault; R = Reverse Fault

2 - Approximate Slip Rate millimeters per year (mm/yr) obtained from CGS (2003) and USGS (2008)

3 - N = North; S = South; V = Vertical; NE = Northeast, E = East

4 - Fault Length obtained from CGS (2003) and USGS (2008)

5 - Distances from Project noted are the closest distances to the surface trace or inferred projection of the fault as measured from the CDMG (1998), CGS (2003), or USGS (2008)

6 - Maximum Earthquake values reported at maximum moment magnitude by the CGS (2003) and USGS (2008)

#### 4.6.4.3 Faults

Both active and potentially active faults are located in the Project area, as shown in **Figure 4.6-1: Faults within the Project Area.**

##### Active Faults

The faults closest to the Project area that are considered "active" include the following:

##### Newport Inglewood Fault Zone

The Los Angeles Basin section of the NIFZ is the closest major active fault zone to the Project, with the Inglewood and Potrero fault segments located respectively at their nearest points, approximately 0.45 miles (0.75 km) east and 0.15 miles (0.25 km) west of the Project alignment. The NIFZ is composed of

a series of discontinuous northwest trending en echelon faults extending from Ballona Gap southeast to the area offshore of Newport Beach.<sup>26</sup> This zone is reflected at the surface by a line of geomorphically young anticlinal hills and mesas formed by the folding and faulting of a thick sequence of Pleistocene-age sediments and Tertiary-age sedimentary rocks. Historical seismic activity (between 1977 and 1985) shows mostly strike-slip faulting with some reverse faulting along the northern segment (north of Dominguez Hills), and normal faulting along the southern segment (south of Dominguez Hills to Newport Beach).

##### Inglewood Fault

The Inglewood Fault, one local component of the Newport-Inglewood Fault Zone, is well exposed in the Baldwin Hills, where it has been mapped by the USGS.<sup>27</sup> North of Centinela Creek, which is northwest of the Project, the fault offsets geologic units of Pleistocene age and is marked by a westerly-facing scarp which dies out to the south with only a small break in slope extending south of Centinela Creek.<sup>28</sup>

There is diverse opinion as to whether the fault extends south of Centinela Creek along its established trend, or whether it is offset by the Centinela Creek Fault and becomes the Townsite Fault, which trends through portions of the Project alignment, towards the southeast and across Sofi Stadium.<sup>29</sup>

##### Potrero Fault

The Potrero Fault, a major local component of the Newport-Inglewood Fault Zone, traverses east of the Project in a northwest-southeast direction. It is well defined in the subsurface by oil well data from the Potrero oil field where it consists of a zone 100 to 200 feet wide.<sup>30</sup> It is known to cut Pleistocene aquifers in the Centinela Creek area where historically it was responsible for the existence of the Centinela Spring. At its intersection with the Centinela Fault, the Potrero Fault is either offset or bent so that its northern extension is displaced to the east. Along the east side of the Sofi Stadium, the fault is marked at the surface by an impressive westward-facing scarp about 50 feet high. Near its southern end, both topographic and subsurface evidence of its position disappear. The fault bends to the east and extends toward the southeast of the City.

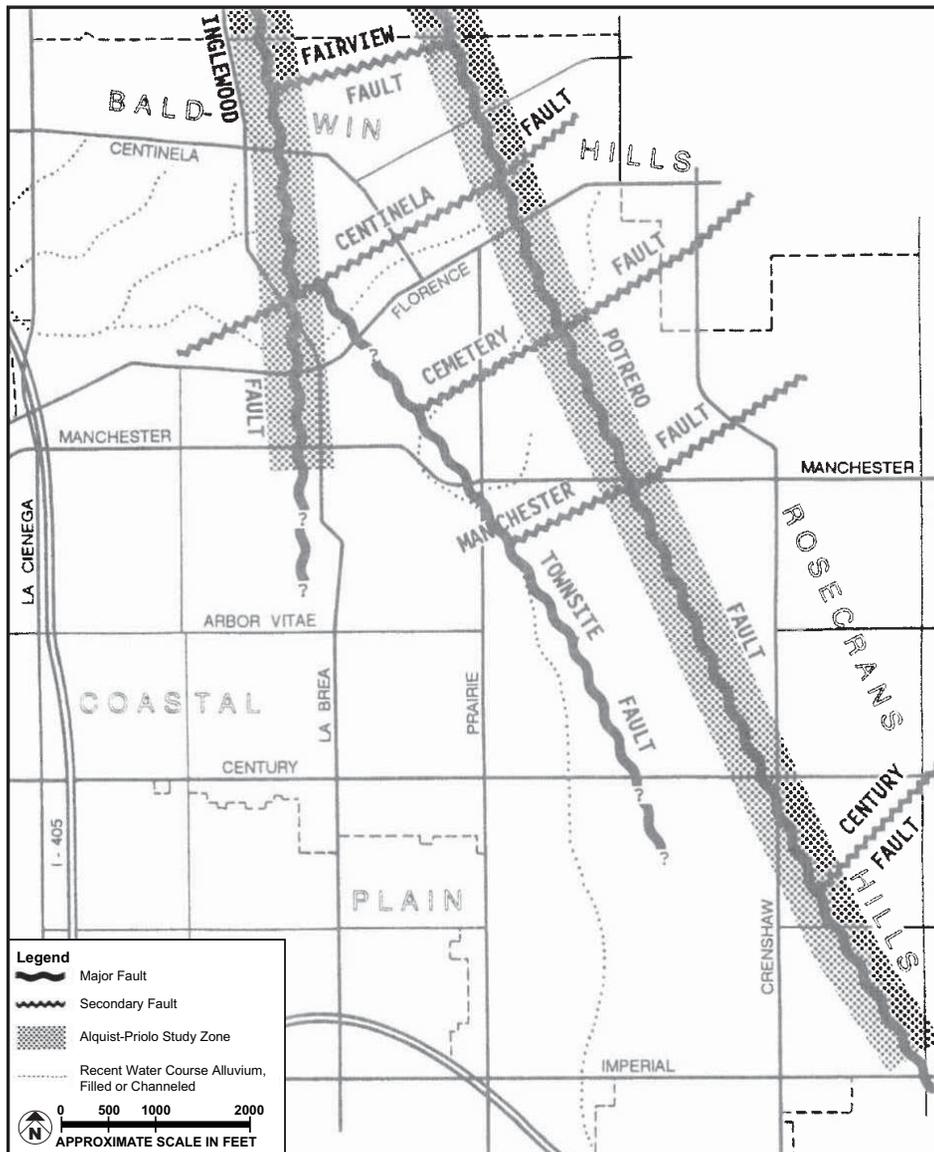
26 En echelon faults are parallel or subparallel, closely spaced, overlapping, or step-like faults that are oblique to the overall structural trend.

27 Fault Rupture Hazard Evaluation in Support of Draft EIR (Fault Rupture Hazard Evaluation), Geosyntec Consultants, September 27, 2019.

28 City of Inglewood, General Plan, Safety Element, July 1995.

29 Fault Rupture Hazard Evaluation in Support of Draft EIR (Fault Rupture Hazard Evaluation), Geosyntec Consultants, September 27, 2019.

30 City of Inglewood, General Plan, Safety Element, July 1995.



SOURCE: City of Inglewood General Plan Safety Element; Meridian Consultants LLC - 2020

FIGURE 4.6-1

Faults within the Project Area



251-003-20

**Santa Monica Fault Zone**

The SMFZ is considered a continuous zone comprised of five fault segments including the Malibu Coast, Santa Monica, Hollywood, and Raymond faults, with a total length of approximately 150 miles. The SMFZ exhibits both reverse and left-lateral components of slip and is located approximately 7 miles (12 km) northwest of the Project alignment at its nearest points. The SMFZ extends 25 miles from the western edge of Beverly Hills across West Los Angeles and Santa Monica to Pacific Palisades, where it trends offshore and parallels the Malibu coast near Point Dume. The SMFZ extends eastward as the Hollywood fault along the base of the Santa Monica Mountains from the West Beverly Hills Lineament in the West Hollywood-Beverly Hills area, to the Los Feliz area of Los Angeles. The active Hollywood fault trends east-west along the southern boundary of the Santa Monica Mountains, located approximately 8.5 miles (13.5 km) north of the proposed Project.

**San Andreas Fault Zone**

The San Andreas strike-slip fault is located approximately 40 miles (65 km) to the northeast, along the northern edge of the San Gabriel Mountains at their contact with the Mojave Desert. The approximately 700-mile-long San Andreas Fault is a network of faults that collectively accommodates the majority of relative north-south motion between the North American and Pacific tectonic plates. The most recent movement on the fault is estimated to be Latest Quaternary (less than 15,000 years before present) with a slip rate of 30 millimeters per year (mm/yr) and a 100-135-year recurrence rate.

**Elsinore Fault Zone**

The Whittier section of the right-lateral Elsinore fault zone is approximately 17 miles (27 km) to the east of the Project. The most recent movement in the fault zone is estimated to be within late Quaternary (less than 15,000 years before present) with a slip rate of 2.5 mm/yr.

**Blind Thrust Faults**

Blind thrust fault zones are considered active features that do not rupture at the ground surface. Although these features present risk by generating intense seismic shaking, their respective distances to the proposed Project are not included in Table 4.6-1 due to the uncertainty in their vertical surface projection. Known blind thrust faults within the Project vicinity along with their respective slip rates and maximum moment magnitudes are described below.

**Elysian Park Thrust**

The Elysian Park Thrust, previously defined as the Elysian Park Fold and Thrust Belt, is a blind thrust fault that overlies the Los Angeles and Santa Fe Springs segments of the Puente Hills Thrust. The eastern edge of the Elysian Park Thrust is defined by the northwest-trending Whittier fault zone. The closest edge of the

vertical surface projection of the Elysian Park Thrust is approximately 6 miles (10 km) northeast of the proposed Project. Like other blind thrust faults in the Los Angeles area, the Elysian Park Thrust is not exposed at the surface and does not present a potential surface rupture hazard; however, should be considered an active feature capable of generating future earthquakes. An average slip rate of 1.3 mm/yr and a maximum moment magnitude (M, defined as a measurement of the size of an earthquake in terms of energy released) of 6.4 were estimated for the Elysian Park Thrust.

#### **Compton-Los Alamitos Thrust**

The Compton-Los Alamitos Thrust is an inferred blind thrust fault located within the south-central portion of the Los Angeles Basin. The closest edge of the vertical surface projection of the buried thrust fault is located approximately 8 miles (13 km) southwest of the Project alignment. Like other blind thrust faults in the Los Angeles Area, the Compton-Los Alamitos Thrust is not exposed at the surface and does not present a potential surface rupture hazard; however, should be considered an active feature capable of generating future earthquakes. An average slip rate of 1.5 mm/yr and a maximum moment magnitude M 6.8 were estimated for the Compton-Los Alamitos Thrust.

#### **Puente Hills Blind Thrust**

The Puente Hills Blind Thrust fault (PHBT) system extends eastward from downtown Los Angeles to Brea in northern Orange County. The PHBT is comprised of three north-dipping segments overlain by folds expressed at the surface as the Coyote Hills, Santa Fe Springs Anticline, and the Montebello Hills. The PHBT exhibits an estimated average slip rate of 0.7 mm/year. Postulated earthquake scenarios for the PHBT include a single segment rupture of a magnitude M 6.6, and a multiple segment rupture producing an earthquake of M 7.1. The PHBT is not exposed at the ground surface and does not present a potential for surface fault rupture. However, based on deformation of late Quaternary age sediments above this fault system and the occurrence of the Whittier Narrows earthquake, the PHBT is considered an active fault capable of generating future earthquakes beneath the Los Angeles Basin.

#### **Potentially Active Faults**

Faults considered “potentially active” located close to the Project alignment include the following:

#### **Overland Fault**

The Overland fault located approximately 1.3 miles (2 km) southwest of the Project alignment is considered potentially active. The Overland fault trends northwest between the Charnock fault and the Newport-Inglewood fault zone, extending from the northwest flank of the Baldwin Hills to Santa Monica Boulevard in the vicinity of Overland Avenue. However, there is no evidence that the fault has offset late Pleistocene or Holocene age alluvial deposits and is considered potentially active by the State Geologist.

#### **Charnock Fault**

The potentially active Charnock fault is located approximately 3.8 miles (6 km) southwest of the Project alignment. The Charnock fault trends northwest-southeast subparallel to the Newport-Inglewood fault zone and the Overland fault. No recent evidence suggests the fault has offset late Pleistocene or Holocene age alluvial deposits and is considered potentially active by the State Geologist.

#### **Townsite Fault**

The Townsite fault extends from its intersection with the Centinela Fault in the Centinela Creek, towards the southeast—likely across the Sofi Stadium—to Century Boulevard. Nearby improvements weave around the Townsite fault. The Townsite fault does not lie within the boundaries of an “Earthquake Fault Zone” as defined by the State of California in the Alquist-Priolo Earthquake Zoning Act. However, its location within the active NIFZ suggests it should be considered active with the potential for surface fault rupture.

#### **Transverse Faults**

Five generally east-west trending faults intersect the major general north-south trending faults (Inglewood, Townsite, and Potrero): Fairview, Centinela, Manchester Boulevard, Inglewood Park Cemetery, and Century Faults. Little geologic data have been published on these faults. They have been mapped on the basis of topographic expression and some studies. As shown in **Figure 4.6-1**, the Centinela Creek fault, Inglewood Park Cemetery fault, and Manchester Boulevard fault are perpendicular to the Townsite fault and in close proximity to the Project.

#### **Surface Fault Rupture**

Surface rupture or displacement occurs as a fault breaks the ground surface during a seismic event. Generally, this hazard is anticipated to occur along pre-existing faults. There has been no history of any major surface rupture on any of these fault zones.<sup>31</sup>

Fault rupture hazard is evaluated to assess the exposure of people or structures to substantial adverse effects, including the risk of loss, injury, or death. The potential for fault surface rupture is generally considered to be significant along “active” faults and to a lesser degree along “potentially active” faults.

The proposed Project does not lie within the boundaries of an Earthquake Fault Zone as defined previously. The closest Alquist-Priolo Zone to the proposed Project has been established for two portions of the Newport-Inglewood fault zone located approximately 280-feet west of the alignment along North Market

<sup>31</sup> City of Inglewood *Technical Background Report*, August 2006.

Street (Inglewood fault), and approximately 2,750-feet east of the alignment from the intersection of West Manchester Boulevard and Prairie Avenue (Potrero fault).

#### 4.6.4.4 Ground Shaking

Most of Southern California is characterized by seismic activity and is subject to some level of ground shaking as a result of movement along the major active (and potentially active) fault zones that are located in the region. Additionally, as a result of the existing faults within the City and the region, the Project area is seismically active. Ground shaking is a major cause of structural damage from earthquakes. The amount of motion expected at a building or structure site can vary from none to forceful depending upon the distance to the fault, the magnitude of the earthquake, and the local geology. Greater movement can be expected at sites located on poorly consolidated material such as alluvium located near the source of the earthquake epicenter or in response to an earthquake of great magnitude.

The City is underlain by two different types of alluvium soils, undifferentiated late Pleistocene alluvium (Qoa) that is composed of well consolidated and cemented gravel, sand, silt, and clay; and late Holocene alluvium (Qya2) that is composed of unconsolidated and uncemented gravel, sand, silt, and clay. Both of these soil types generally provide poor resistance to ground shaking.<sup>32</sup>

The Project alignment is situated within a seismically active region and would likely experience moderate to severe ground shaking in response to a large-magnitude earthquake occurring on a local or more distant active fault during the expected lifespan of the Project. The potential for significant seismically induced ground shaking in response to an earthquake occurring along a nearby active fault is relatively high within the vicinity of the proposed Project.

#### 4.6.4.5 Paleontological Resources

The geologic units present in the Project area are older quaternary alluvium (Qoa), deposited from erosion of the surrounding highlands. Qoa are considered to have a high paleontological sensitivity. They are old enough to preserve fossil resources (i.e., over 5,000 years, as per the SVP) and have a rich fossil history in Los Angeles and throughout southern California. A wide variety of Ice Age fossils are known from these sediments across the Los Angeles Basin including multiple specimens belonging to ten taxa known from within two to four miles of the proposed Project vicinity.<sup>33</sup>

Additionally, according to the Natural History Museum of Los Angeles County, the closest locality known from Qoa sediments is approximately 2.0 miles west of the Project, where a fossil mammoth

<sup>32</sup> City of Inglewood *General Plan*, "Safety Element" (1995).

<sup>33</sup> Paleontological Resources Assessment Report, Inglewood Basketball and Entertainment Center, City of Inglewood, California, ESA, May 2019

(*Mammuthus*) was recovered 40 feet bgs. North of that locality, specimens of mammoth, rodent (*Rodentia*), and a speckled sanddab (*Citharichthys stigmaeus*) were collected from 14 feet bgs. Near the intersection of Airport Boulevard and Manchester Boulevard, fossil specimens of horse (*Equus*), mammoth, bison (*Bison*), and rabbit (*Lepus*) were collected from 13 – 16 feet bgs. Farther west, near the Los Angeles International Airport, a fossil elephant (*Proboscidea*) was collected from 25 feet bgs.<sup>34</sup>

#### 4.6.4.6 Adjusted Baseline

This section assumes the Adjusted Baseline Environmental Setting as described in **Section 4.0: Environmental Impact Analysis, 4.0.4: Adjusted Baseline**. Related to seismicity and paleontological resources, the changes associated with the Adjusted Baseline projects include excavation and construction activities within the HPSP area.

There is no evidence that development in the HPSP would affect the baseline for analysis of geology and soils. No new impacts to geology and soils have been discovered or documented during construction of the Adjusted Baseline projects that would provide additional information on the presence or sensitivity of geology and soils impacts in the area.

#### 4.6.5 THRESHOLDS OF SIGNIFICANCE

Criteria outlined in CEQA Guidelines were used to determine the level of impacts to geology and soils. As discussed in *Section 4.6.1*, six screening thresholds related to geology and soils of Appendix G of CEQA Guidelines were eliminated from further analysis in this EIR. The below three were identified in the Initial Study as having a potentially significant impact in relation to geology and soils if the Project were to:

- Threshold GEO-1:** Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42.
- Threshold GEO-2:** Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.
- Threshold GEO-3:** Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

<sup>34</sup> Paleontological Resources Assessment Report, Inglewood Basketball and Entertainment Center, City of Inglewood, California, ESA, May 2019

#### 4.6.6 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

**Impact GEO-1:** Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault?

The State of California, under the guidelines of the Alquist-Priolo Earthquake Fault Zoning Act, classifies faults as active, potentially active, and not active. The Alquist-Priolo Earthquake Fault Zoning Act requires that geologic investigations be prepared for development sites within Earthquake Fault Zones (APEFZ) to demonstrate that the sites are not threatened by surface rupture from future faulting. In addition, if an active fault is found, all structures for human occupancy must be set back a minimum of 50 feet, or a distance demonstrated to be appropriate by the geologic investigation, from the fault.

The Project area does not lie within the boundaries of an APEFZ. The nearest APEFZs to the Project 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 Project from the intersection of Manchester Boulevard and Prairie Avenue (the Potrero Fault). Furthermore, previous fault investigations completed west of Market Street did not reveal evidence of faulting or surface rupture (see **Appendix K.1**). Therefore, impacts resulting from the Inglewood and Potrero faults would be less than significant.

The 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 Project alignment. As described previously in *Section 4.6.4.3* and shown in **Figure 4.6-2: Location of Active Faults and the Project**, the Townsite Fault may intersect the Project alignment at various points.

- A segment of the guideway within the parking lot near the Market Street/Florence Avenue Station appears to cross the Townsite Fault, and
- A segment of the guideway on Manchester Boulevard, near the proposed Maintenance and Storage Facility (MSF) may cross the Townsite Fault.

Also as noted in **Figure 4.6-2**:

- The Manchester Fault may intersect the guideway on Prairie Avenue near Pincay Drive, perpendicular to the Townsite Fault,

- The Market Street/Florence Avenue station is approximately 830 feet south of the Centinela Creek Fault, and
- Segments of the guideway on Market Street and Manchester Boulevard are as close as approximately 525 feet southwest of the Inglewood Park Cemetery Fault.

Although the Townsite, Centinela Creek, Inglewood Park Cemetery, and Manchester faults are not APEFZ faults, their 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.<sup>35</sup> As a result of the proposed improvements potentially overlying the Townsite Fault, fault rupture impacts would be potentially significant.

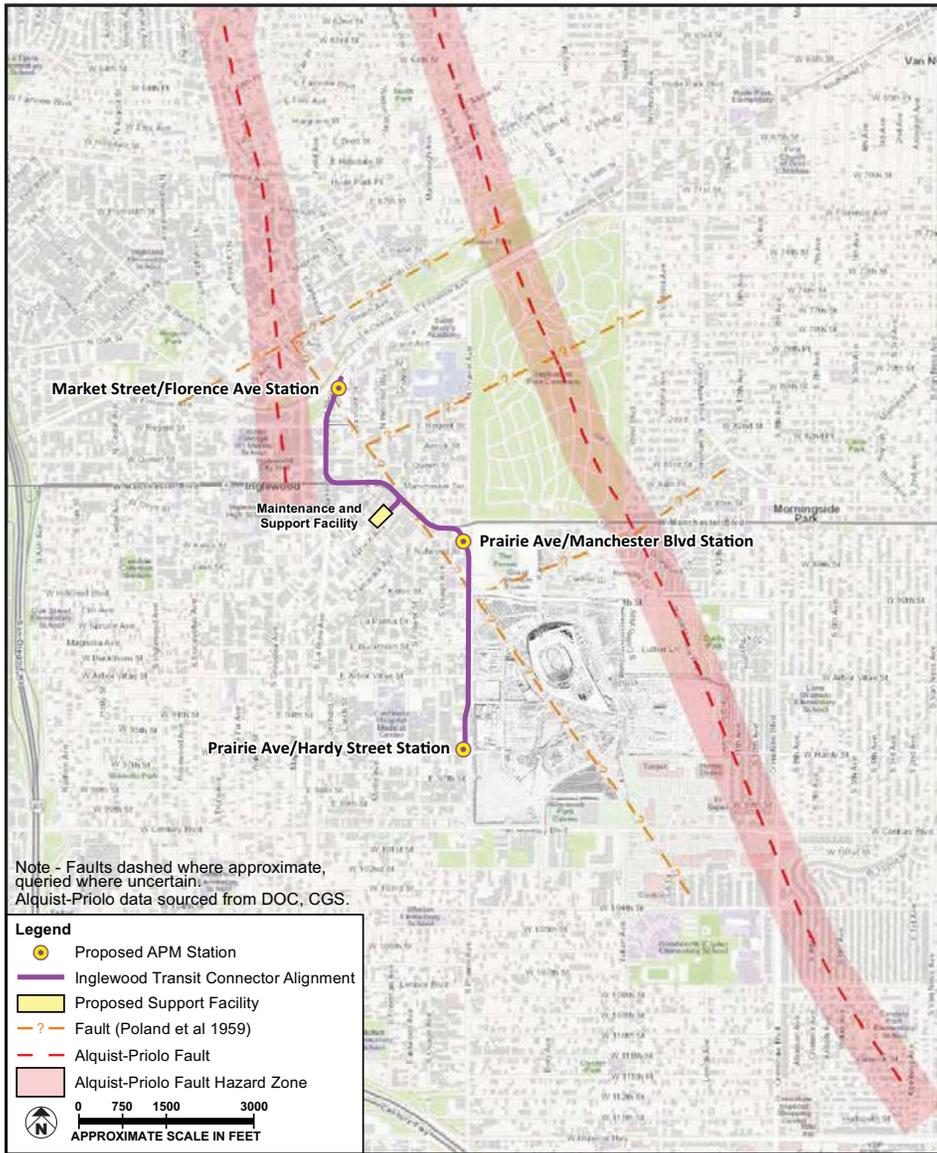
Prior to the start of construction, the anticipated trend of the Townsite fault would be further investigated to identify and locate active fault traces in the Project area and to allow for adjustments to the placement of proposed structures. Additionally, the design of the structures would comply with the provisions of the California Building Code, which would address the potential effects of fault ruptures. Elevated structures that may cross a fault segment, including the guideway and elevated passenger walkways would be designed in conformance with Caltrans MTD 20-8 and 20-10 as discussed above in *Section 4.6.3.2*. Consistent with Caltrans MTD 20-8 and 20-10, columns and abutments, as well as other structural components will be located 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. Designing the Project in conformance with the latest CBC<sup>36</sup>, Caltrans guidance, and applicable seismic design criteria as would be required by **Mitigation Measures (MM) GEO-1** through **MM GEO-3** would reduce potential impacts to less than significant.

#### Summary

The City contains both active and potentially active faults, which may traverse the Project alignment. The Project does not lie within the boundaries of APEFZ as defined by the State of California in the Alquist-Priolo Earthquake Zoning Act. However, the Project alignment is proximate to a number of potentially active faults, including the Townsite fault, Centinela Creek Fault, Inglewood Park Cemetery Fault, and Manchester Fault.

<sup>35</sup> Geosyntec. Fault Rupture Hazard Evaluation in Support of Draft EIR. September 2019.

<sup>36</sup> 2019 California Building Standards Code (Cal. Code Regs., Title 24) published July 1, 2019.



SOURCE: Geosyntec Consultants - September 2019; Meridian Consultants LLC - 2021

FIGURE 4.6-2

Location of Active Faults and the Project

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Although these faults are not mapped as APEFZ faults, or situated within a delineated APEFZ, their locations within the active Newport-Inglewood fault zone suggests that they be considered active with the potential for fault rupture. In particular, the Townsite Fault may intersect the Project alignment and cause surface rupture. Therefore, impacts would be potentially significant. Further investigation of the anticipated trend of the Townsite fault, placement of structures away from faults, and designing the Project in conformance with the latest CBC,<sup>37</sup> Caltrans guidance, and applicable seismic design criteria as would be required by MM GEO-1 through MM GEO-3 would reduce potential fault rupture impacts to less than significant.

4.6.6.1 Mitigation Measures

The following Mitigation Measures (MMs) are identified to reduce potential impacts related to fault rupture and seismic shaking to less than significant:

**MM GEO-1: Project Design.** 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 Automated Transit System (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.

**MM 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 in the Project area to support adjustments to the Project’s 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

37 2019 California Building Standards Code (Cal. Code Regs., Title 24) published July 1, 2019.

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 CPT [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 shall be located to avoid the fault rupture hazard where present.

Columns and foundations for the guideway and stations, as well as any other ATS facilities shall be located to avoid the fault rupture hazard where present.

Probabilistic procedures shall follow those outlined in the *Fault Rupture Hazard Evaluation (Appendix K.1)*. If further study of the fault rupture is conducted, then procedures as outlined in CGS Note 49<sup>38</sup> shall be followed.

**MM 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 (Appendix K.2)* 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 Caltrans Memo to Designers 20-10 -Fault Rupture, dated January 2013.

38 California Geological Survey, Note 49: Guidelines for Evaluating the Hazard of Surface Fault Rupture, <https://www.conservation.ca.gov/cgs/Documents/Publications/CGS-Notes/CGS-Note-49.pdf>.

#### 4.6.6.2 Level of Significance After Mitigation

Implementation of **MM-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 **MM GEO-2**, the trend of the Townsite Fault would be determined through an investigation prior to final design of the Project with the findings dictating the placement of structural improvements to ensure impacts related to fault rupture would be minimized or avoided. Implementation of **MM GEO-3** would ensure that the design of the proposed improvements adhere to specific seismic and structural design criteria. As such, significant impacts and hazards regarding fault rupture and seismic ground shaking would be reduced to a level that is less than significant.

**Impact GEO-2: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?**

Ground shaking is a major cause of structural damage from earthquakes. The amount of motion expected at a building or structure can vary from none to forceful depending upon the distance to the fault, the magnitude of the earthquake, and the local geology. Greater movement can be expected at sites located on poorly consolidated material such as alluvium located near the source of the earthquake epicenter or in response to an earthquake of great magnitude.

The proposed Project is situated in a seismically active region and will likely experience moderate to severe ground shaking in response to a large-magnitude earthquake occurring on a local or more distant active fault during the expected lifespan of the Project. The potential for significant seismically induced ground shaking in response to an earthquake occurring along a nearby active fault, such as the Newport-Inglewood fault zone, or a regional fault, such as the San Andreas fault zone, is relatively high within the vicinity of the proposed Project.

The Project is located within a surface geologic unit designated as “older alluvium (Qoa),” which is described as stiff to hard clay and medium dense to very dense sand, silty sand, clayey sand, and silt. This soil type generally provides poor resistance to ground shaking. Due to the proximity of the Project to nearby faults and the geologic unit, the possibility for extreme seismic shaking within the Project area is potentially significant.

*The Development of Seismic Design Criteria in Support of Draft EIR - Seismic Design Criteria (Appendix K.2)* show the distribution of the mean of the time-averaged shear wave velocity within the upper 30 meters (Vs30\_mean) in the soils in the areas surrounding the ITC are generally considered to be “very dense soil

and soft rock,” which is consistent with generally poor resistance to groundshaking as described previously. The various components of the proposed Project would be susceptible to the effect of ground shaking from seismic activity.

#### ***Aerial Guideways, Elevated Passenger Walkways, and Stations***

Other public agencies, including Caltrans and Metro, have determined that when structures such as those proposed for the guideway and stations are designed, the designs should meet the requirements for “bridges and aerial guideways, the design shall not result in less seismic performance capability than that required by Caltrans.” As such, ground motions developed for the proposed Project in accordance with the maximum design event (MDE) level should be compared to the Caltrans design spectrum<sup>39</sup> and the more critical design load should govern.

#### ***Ancillary Surface Facilities***

Portions of the proposed Project, including the PDS substations, would be subject to review by City building officials. Ground motions developed for the Project in accordance with the MDE level should be compared to the 2019 CBC,<sup>40</sup> and the more critical design load should govern. In the case where commercial/residential structures are unrelated to or not connected to the Project or support buildings directly, the use of 2019 CBC<sup>41</sup> design response spectra may be an appropriate basis for design at the discretion of the design engineer. Again, agencies responsible for the construction and operation of transportation facilities such as Caltrans and Metro have determined that to reduce the effects of extreme seismic shaking, ancillary surface facilities, such as the planned PDS substations, may be subject to both the code forces normally applied to surface buildings as well as those being applied to the transit guideways and above ground structures. Whichever code applies the most critical set of requirements shall apply.<sup>42</sup>

#### ***Summary***

The proposed Project is located within a surface geologic unit designated as “older alluvium (Qoa)” and would be susceptible to the effect of ground shaking from seismic activity. Ground shaking impact resulting in loss, injury, and death would be potentially significant. Furthermore, all Project improvements would be susceptible to structural damage from extreme ground shaking events, and the interruption to service or backup power could occur, resulting in a potentially significant impact for loss, injury, or death.

40 2019 California Building Standards Code (Cal. Code Regs., Title 24, Part 2, Volumes I and II) published July 1, 2019.

40 2019 California Building Standards Code (Cal. Code Regs., Title 24, Part 2, Volumes I and II) published July 1, 2019.

41 2019 California Building Standards Code (Cal. Code Regs., Title 24, Part 2, Volumes I and II) published July 1, 2019.

42 2019 California Building Standards Code (Cal. Code Regs., Title 24) published July 1, 2019.

#### **4.6.6.3 Mitigation Measures**

**MM GEO-1** through **MM GEO-3** shall be implemented to reduce potentially significant impacts related to seismic ground shaking to less than significant.

#### **4.6.6.4 Level of Significance After Mitigation**

Implementation of **MM GEO-1** through **MM GEO-3** would reduce seismic related impacts to less than significant.

**Impact GEO-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

A direct effect on a unique paleontological resource would result in the direct damage or destruction of such a resource. Indirect impacts are not specifically caused by a development project but may be a reasonably foreseeable result of such a project. Typical indirect impacts to paleontological resources include the destruction or loss of surface fossils from increased erosion or the non-scientific or unauthorized surface collection or subsurface excavation of a fossil or paleontological site.

The Project area is underlain by artificial fill materials, as shallow as two feet bgs before alluvial soils are encountered. The subsurface sediments in the Project area are identified as Qoa and are assigned high paleontological sensitivity,<sup>43</sup> as there is a proven record throughout Los Angeles of containing scientifically significant fossils in this formation. Although no known resources were identified within the Project vicinity from the Natural History Museum, this does not preclude the possibility that previously unknown buried paleontological resources could be impacted during Project construction. Excavation during construction could encounter Qoa determined to have a high sensitivity for fossils, and the proposed Project would have the potential to directly and/or indirectly destroy a previously unknown unique paleontological resource.

Implementation of **MM GEO-4** would require that prior to the City’s approval of grading permits, a paleontologist meeting the SVP Standards be retained to prepare, design, and implement a paleontology monitoring and mitigation program for the Project consistent with SVP Guidelines. This monitoring and mitigation program would include education and sensitivity training for construction workers, guidelines for on-site paleontological monitors to issue stop-work orders if fossils are found, procedures for paleontological resource evaluation in the event of discovery, and final reporting procedure guidelines for

43 Paleontological Resources Assessment Report, Inglewood Basketball and Entertainment Center, City of Inglewood, California, ESA, May 2019.

submission to the City. With implementation of **MM GEO-4**, potentially significant impacts related to paleontological resources would be reduced to less than significant.

#### 4.6.6.5 Mitigation Measures

The following mitigation measure will reduce potentially significant impacts to paleontological resources to less than significant:

**MM GEO-4:** A qualified paleontologist meeting the SVP standards shall be retained by the project applicant and approved by the City prior to the approval of grading permits. The qualified paleontologist shall:

- a) Prepare, design, and implement a monitoring and mitigation program for the Project consistent with Society of Vertebrate Paleontology Guidelines. The Plan 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 fossil remains can be salvaged in a timely manner), fossil treatment, procurement, and reporting. The Plan monitoring and mitigation program shall be prepared and approved by the City prior to the issuance of the first grading permit. If the qualified paleontologist determines that the Project-related grading and excavation activity would not affect Older Quaternary Alluvium, then no further mitigation is required.
- b) Conduct construction worker paleontological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.) and would present the Plan as outlined in (a). In the event construction crews are phased or rotated, additional training shall be conducted for new construction personnel working on ground-disturbing activities. The training session shall provide instruction on the recognition of the types of paleontological resources that could be encountered within the Project area and the procedures to be followed if they are found. Documentation shall be retained by the qualified paleontologist demonstrating that the appropriate construction personnel attended the training.
- c) Direct the performance of paleontological resources monitoring by a qualified paleontological monitor (meeting the standards of the SVP, 2010). Paleontological resources monitoring shall be conducted pursuant to the monitoring and mitigation program developed under (a), above. Monitoring activities may be altered or ceased if determined adequate by the qualified paleontologist. Monitors shall have the authority to and shall temporarily halt or divert work away from exposed fossils or potential fossils and establish a 50-foot radius temporarily halting work around the find. Monitors shall prepare daily logs detailing the types of ground disturbing activities and soils observed, and any discoveries.

- d) If fossils are encountered, determine their significance, and, if significant, supervise their collection for curation. Any fossils collected during Project-related excavations, and determined to be significant by the qualified paleontologist, shall be prepared to the point of identification and curated into an accredited repository with retrievable storage.
- e) Prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the paleontological monitoring. If there are significant discoveries, fossil locality information and final disposition shall be included with the final report which would be submitted to the appropriate repository 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 could affect Older Quaternary Alluvium.

#### 4.6.6.6 Level of Significance after Mitigation

Implementation of **MM GEO-4** would ensure that paleontological resources would be identified before they are damaged or destroyed and are properly evaluated and treated to reduce potentially significant impacts to less than significant.

#### 4.6.7 CUMULATIVE IMPACTS

Geotechnical impacts related to developments in the City would involve hazards related to site-specific soil conditions, erosion, and ground-shaking during earthquakes. These impacts would be site-specific and would not be common to (nor shared with, in an additive sense) the impacts on other sites. Cumulative development in the area would increase the overall population for exposure to seismic hazards by increasing the number of people potentially exposed. However, with adherence to **MM GEO-1** through **MM GEO-3**, applicable State, and federal regulations, building codes and sound engineering practices, geologic hazards could be reduced to less-than-significant levels. Furthermore, development of each of the related projects and the proposed Project would be subject to existing building codes, uniform site development and construction review standards that are designed to protect public safety. Therefore, cumulative geotechnical impacts would not be cumulatively considerable.

Impacts to paleontological resources related to future development in the region could involve the demolition or destruction of significant paleontological resources. The proposed Project could contribute to this impact if paleontological resources are located beneath the Project area and are damaged or destroyed during the excavation process. In such an event, the proposed Project contribution to the significant cumulative impact would be cumulatively considerable, and impacts would be potentially significant. Implementation of **MM GEO-4** would lessen the Project's contribution to the loss of paleontological resources by requiring that work stop of such resources are discovered, until the resources can be evaluated, collected, properly treated, and curated with accredited repository with retrievable storage. With implementation of this mitigation measure, the Project's contribution to the cumulative loss of paleontological resources would be less than cumulatively considerable.

4.6.8 CONSISTENCY WITH CITY OF INGLEWOOD GENERAL PLAN

4.6.8.1 Safety Element

Table 4.6-2: Project Consistency with General Plan Safety Element below lists the policy and measures from the City's General Plan Safety Element applicable to the proposed Project:

Table 4.6-2  
Project Consistency with General Plan Safety Element

Policies and Measures	Plan Consistency
<p><b>Policy 1:</b> Provide Measures to reduce seismic impacts.</p>	<p><b>Consistent with Mitigation.</b></p> <p>The proposed Project is located in a seismically active area. As such, the Project including the guideway, stations, MSF, and elevated passenger walkways, and other support facilities would be subject to seismic shaking. The replacement Vons store, which would be developed prior to proposed Project construction, would also be subject to seismic shaking.</p> <p>The Recirculated Draft EIR identified Mitigation Measures <b>MM GEO-1</b>, <b>MM GEO-2</b>, and <b>MM GEO-3</b> to avoid fault rupture from seismic activity and to reduce the effects of seismic shaking on built structures.</p> <p>Implementation of <b>MM GEO-1</b> would dictate the location of the ATS system where it crosses the known active and potentially active faults to prevent failure from fault rupture and would be consistent with Caltrans Memo to Designers 20-8 and 20-10. With implementation of <b>MM GEO-2</b>, the trend of the Townsite Fault would be specified through an investigation prior to Project construction; findings would dictate the placement of proposed structural improvements to ensure that impacts related to fault rupture would be minimized or avoided. Implementation of <b>MM GEO-3</b> would ensure that the design of the proposed improvements adhere to conservative specific seismic design criteria.</p> <p>The Project's compliance with the latest CBC and Caltrans advisory design measures would reduce potential impacts related to seismic ground shaking to a less-than-significant-level. In addition, the proposed Project would be consistent with Caltrans requirements pertaining to aerial guideways, bridges, and ancillary surface facilities.</p> <p>Further compliance with the requirements of the 2019 CBC, City municipal code, and Caltrans for structural safety would reduce hazards from strong seismic ground shaking to a less-than-significant-level.</p>
<p>Restrict new structures for human occupancy from being constructed across active faults.</p>	<p><b>Consistent with Mitigation.</b></p> <p>The proposed Project may cross potentially active faults (Townsite Fault). To assure compliance with this policy the Recirculated Draft EIR identified mitigation measure: <b>MM GEO-2</b>.</p>

Policies and Measures	Plan Consistency
<p>Require geological and soils engineering investigations in high risk fault areas.</p>	<p>This measure is directed towards the City and would not apply to the proposed Project, as it is a transportation project with no residential component. Implementation of <b>MM GEO-2</b> would dictate the location of structural improvements that cross the fault segments to prevent failure from potential fault rupture and would be consistent with Caltrans Memo to Designers 20-8 and 20-10.</p> <p>Implementation of <b>MM GEO-1</b>, the trend of the Townsite fault would be specified through an investigation prior to Project construction; findings would dictate placement of structural improvements to ensure that impacts related to fault rupture would be minimized or avoided.</p>
<p>Use the latest State-approved edition of the Uniform Building Code and other applicable seismic design information</p>	<p><b>Consistent with Mitigation.</b></p> <p>The proposed Project crosses potentially active faults (Townsite Fault). To assure compliance with this policy the Recirculated Draft EIR identified mitigation measure: <b>MM GEO-2</b>.</p> <p>Implementation of <b>MM GEO-2</b> would require the performance a geotechnical investigation prior to Project construction to evaluate localized geological and soils conditions, such as the approximate trend of the Townsite Fault.</p>
<p>Require a soils report for new buildings, as well as obtaining or utilizing, when available, geologic drillings or studies, local ground subsidence and elevation studies, geologic-seismic studies, strong motion monitoring, gathering, compiling, and interpreting local and regional geologic seismic data as it becomes available.</p>	<p><b>Consistent.</b></p> <p>The Project's compliance with 2019 CBC and Caltrans advisory design measures would reduce potential impacts related to seismic ground shaking to a less-than-significant-level. In addition, the proposed Project would be consistent with Caltrans requirements pertaining to aerial guideways, bridges, and ancillary surface facilities.</p> <p>Because the Project alignment is in a seismically active region, some risk related to seismic ground shaking would remain, even with compliance with all applicable regulatory standards and design guidelines.</p> <p>The proposed Project would comply with the requirements of the Municipal Code Chapter 11, Article 2 Building Code, which has adopted the has incorporated the most up to date California Building Code.</p>
<p>Require a soils report for new buildings, as well as obtaining or utilizing, when available, geologic drillings or studies, local ground subsidence and elevation studies, geologic-seismic studies, strong motion monitoring, gathering, compiling, and interpreting local and regional geologic seismic data as it becomes available.</p>	<p><b>Consistent.</b></p> <p>The proposed Project would be subject to review the design by the City and subject to the requirements of the Municipal Code Chapter 11, Article 2 Building Code, which has adopted the has incorporated the most up to date California Building Code.</p>

## 4.7 GREENHOUSE GAS EMISSIONS

### 4.7.1 INTRODUCTION

This section of the Recirculated Draft Environmental Impact Report (Recirculated Draft EIR) evaluates the significance of the greenhouse gas (GHG) emissions that would be generated by the proposed Inglewood Transit Connector Project (proposed Project).

The section contains: (1) a description of the local setting to establish baseline conditions; (2) a summary of the relationship between GHG emissions and global climate change; (3) an overview of applicable plans, policies, and regulations related to GHG emissions; (4) an assessment of current GHG emissions at the City, State, national, and global levels; (5) a quantitative analysis of future GHG emissions associated with construction and operation of the proposed Project; and (6) an analysis of the consistency of the proposed Project with applicable regulations, plans, and policies to reduce GHGs as set forth by the State of California, South Coast Air Quality Management District (SCAQMD), Southern California Association of Governments (SCAG) and the City of Inglewood (City).

The proposed Project's GHG emissions are considered within the context of the City's planning for the reduction of GHG emissions. The sustainable design features of the proposed Project that would reduce GHG emissions are compared to measures identified in the *Inglewood Energy and Climate Action Plan* to determine the consistency of the proposed Project with the City's plans to reduce GHG emissions.

A quantified estimate of GHG emissions is provided for both construction and operations of the proposed Project. GHG emissions were analyzed using a variety of modeling techniques and are detailed within:

- *Air Quality and Heath Risk Assessment Technical Report for the Inglewood Transit Connector Project*, Meridian Consultants LLC, September 2021 (**Appendix G.1**)
- *Vons Replacement CalEEMod Output Sheets*, Meridian Consultants LLC, October 2021 (**Appendix G.2**)

After circulation of the December 2020 Draft EIR for public review, the City revised the design of the proposed Project in response to consultation with key stakeholders in the community and comments received on the December 2020 Draft EIR. Specific changes to the proposed Project include raising the height of the Automated Transit System (ATS) guideway along Market Street to preserve existing views of historic buildings, relocating the Prairie Avenue/Pincay Drive Station to the southwest corner of Prairie Avenue and Manchester Boulevard, redesign of the proposed MSF to allow this facility to be located on the proposed site with a new Vons store, and realignment of the guideway and stations on Prairie Avenue to the west side of Prairie Avenue. Additionally, the construction phasing plan has been refined. As it

relates to GHG impacts, these changes resulted in reductions of GHG emissions compared to the December 2020 Draft EIR.

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Recirculated Draft EIR.

### 4.7.2 OVERVIEW OF GREENHOUSE GAS EMISSIONS

#### 4.7.2.1 Global Context

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and storms. Historical records indicate that global climate changes have occurred in the past due to natural phenomena; however, current data increasingly indicate that the current global conditions differ from past climate changes in rate and magnitude. Global climate change attributable to anthropogenic (human) GHG emissions is currently one of the most important and widely debated scientific, economic, and political issues in the United States and the world. The extent to which increased concentrations of GHGs have caused or will cause climate change and the appropriate actions to limit and/or respond to climate change are the subject of significant and rapidly evolving regulatory efforts at the federal and State levels of government.

GHGs are global pollutants that have long atmospheric lifetimes (1 year to several thousand years). GHGs persist in the atmosphere for a long enough time to be dispersed around the globe. Although the exact lifetime of any particular GHG molecule depends on multiple variables and cannot be pinpointed, more CO<sub>2</sub> is currently emitted into the atmosphere than is avoided or sequestered. CO<sub>2</sub> sinks, or reservoirs, include vegetation and the ocean, which absorb CO<sub>2</sub> through photosynthesis and dissolution, respectively. These are two of the most common processes of CO<sub>2</sub> sequestration. Of the total annual human-caused CO<sub>2</sub> emissions, approximately 54 percent is sequestered within a year through ocean uptake, northern hemisphere forest regrowth, and other terrestrial sinks; the remaining 46 percent of human-caused CO<sub>2</sub> emissions are stored in the atmosphere.

Similarly, the effects of GHGs are borne globally (sea-level rise, hurricanes, droughts, etc.), as opposed to the localized air quality effects of criteria air pollutants and toxic air contaminants (TACs). The quantity of GHGs that it takes to ultimately result in climate change is not precisely known, but that quantity is enormous. No single project would be expected to measurably contribute to a noticeable incremental change in the global average temperature, or to global, local, or microclimates. However, it is the combined GHG contributions per project that create an impact.

Not all GHGs possess the same capacity to induce atmospheric warming; as a result, the warming contribution of a GHG is commonly quantified in the common unit of carbon dioxide equivalent (CO<sub>2</sub>e)

over a 100-year period, by applying the appropriate global warming potential (GWP) value. GHGs with lower emissions rates than carbon dioxide (CO<sub>2</sub>) may still contribute to climate change because they are more effective at absorbing outgoing infrared radiation than carbon dioxide.<sup>1</sup> By using the applicable GWP for each GHG, project-related emissions can be tabulated in the common unit of metric tons per year carbon dioxide equivalent (MTCO<sub>2</sub>e/year). GWP ratios are provided by the Intergovernmental Panel on Climate Change (IPCC). Historically, GHG emission inventories were calculated using the GWPs from the IPCC's Second Assessment Report (SAR), published in 1996. The IPCC has since updated the GWP values based on the latest science in its Fourth Assessment Report (AR4)<sup>2</sup> and Fifth Assessment Report (AR5),<sup>3</sup> published in 2007 and 2014, respectively. California Air Resources Board (CARB) uses the AR4 GWPs in the Statewide GHG emissions inventory,<sup>4</sup> in the current Climate Change Scoping Plan,<sup>5</sup> and in the current version of the California Emissions Estimator Model (CalEEMod)<sup>6</sup> that is used to calculate CO<sub>2</sub>e values for construction as well as operations for existing and proposed Project build-out conditions.

Methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O) are generally much lower than those of carbon dioxide (CO<sub>2</sub>) and are associated with anaerobic microbial activity resulting from agricultural practices, flooded soils, and landfills. Methane and nitrous oxide have approximately 23 and 296 times the GWP of carbon dioxide, respectively.

#### 4.7.2.2 Effects of Global Climate Change

The scientific community's understanding of the fundamental processes responsible for global climate change has improved over the past decade, and its predictive capabilities are advancing. However, there remain scientific uncertainties in, for example, predictions of local effects of climate change, occurrence, frequency, and magnitude of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. Due to the complexity of and inability to accurately model Earth's climate system, the uncertainty surrounding climate change may

- 1 The measure of carbon dioxide equivalent (CO<sub>2</sub>e) is used to account for the different potentials of GHGs to absorb infrared radiation. This potential, known as the global warming potential (GWP) of a GHG, is dependent on the lifetime, or persistence, of the gas molecule in the atmosphere.
- 2 Intergovernmental Panel on Climate Change, 2007. *Synthesis Report. Contribution of Working Groups I, II and III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change*. Available: <https://www.ipcc.ch/assessment-report/ar4/>. Accessed September 21, 2021.
- 3 Intergovernmental Panel on Climate Change, 2014. *Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*. Available: [www.ipcc.ch/report/ar5/syrhttps://](http://www.ipcc.ch/report/ar5/syrhttps://). Accessed September 21, 2021.
- 4 Intergovernmental Panel on Climate Change, 2014. *Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*. Available: [www.ipcc.ch/report/ar5/syrhttps://](http://www.ipcc.ch/report/ar5/syrhttps://). Accessed September 21, 2021.
- 5 California Air Resources Board, 2017. *California's 2017 Climate Change Scoping Plan: The strategy for achieving California's 2030 greenhouse gas target*. Available: [www.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](http://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf). Accessed August 4, 2020.
- 6 California Emissions Model (CalEEMod®), <http://www.aqmd.gov/caleemod/home>. Accessed September 21, 2021.

never be completely eliminated. Nonetheless, the IPCC's Fifth AR5<sup>7</sup> states that is extremely likely that the dominant cause of the observed warming since the mid-20th century is the anthropogenic increase in GHG concentrations.<sup>8</sup> A report from the National Academy of Sciences concluded that 97 to 98 percent of the climate researchers most actively publishing in the field support the tenets of the IPCC in that climate change is very likely caused by human (i.e., anthropogenic) activity.<sup>9</sup>

The AR4<sup>10</sup> found that the potential impacts in California due to global climate change include: loss in snow pack; sea-level rise; more extreme heat days per year; more high ozone days; more extreme forest fires; more severe droughts punctuated by extreme precipitation events; increased erosion of California's coastlines and sea water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems; and increased pest infestation.<sup>11</sup> The Fourth Assessment's findings are consistent with climate change studies published by the California Natural Resources Agency (CNRA) since 2009, starting with the California Climate Adaptation Strategy 10 as a response to the Governor's Executive Order S-13-2008.<sup>12</sup> In 2014, the CNRA rebranded the first update of the 2009 adaptation strategy as the Safeguarding California Plan.<sup>13</sup> The 2018 update to Safeguarding California Plan identifies hundreds of ongoing actions and next steps State agencies are taking to safeguard Californians from climate impacts within a framework of 81 policy principles and recommendations.<sup>14</sup>

#### Temperature Increase

The primary effect of adding GHGs to the atmosphere has been a rise in the average global temperature. The impact of human activities on global temperature is readily apparent in the observational record. Since 1895, the contiguous US has observed an average temperature increase of 1.5 degrees Fahrenheit (°F) per

- 7 Intergovernmental Panel on Climate Change, 2014. *Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*. Available: [www.ipcc.ch/report/ar5/syrhttps://](http://www.ipcc.ch/report/ar5/syrhttps://). Accessed September 21, 2021.
- 8 Intergovernmental Panel on Climate Change, 2014. *Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*. Available: [www.ipcc.ch/report/ar5/syrhttps://](http://www.ipcc.ch/report/ar5/syrhttps://). Accessed September 21, 2021.
- 9 Anderegg, William R. L., J.W. Prall, J. Harold, S.H., Schneider, 2010. *Expert Credibility in Climate Change, Proceedings of the National Academy of Sciences of the United States of America*. 2010; 107:12107-12109.
- 10 Intergovernmental Panel on Climate Change, 2007. *Synthesis Report. Contribution of Working Groups I, II and III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change*. Available: <https://www.ipcc.ch/assessment-report/ar4/>. Accessed September 21, 2021.
- 11 California Governor's Office of Planning and Research, Scripps Institution of Oceanography, CEC, California Public Utilities Commission. 2018. *Statewide Summary Report. California's Fourth Climate Change Assessment*. Publication number: SUMCCCA4-2018-013. Available: <http://www.climateassessment.ca.gov/state/docs/20190116-StatewideSummary.pdf>. Accessed September 21, 2021.
- 12 California Office of the Governor, California Executive Order S-13-08 Requiring State Adaptation Strategy, November 14, 2008.
- 13 California Natural Resources Agency, 2014. *Safeguarding California: Reducing Climate Risk, an Update to the 2009 California Climate Adaptation Strategy*. Available: <https://files.resources.ca.gov/climate/safeguarding/>. Accessed September 21, 2021.
- 14 California Natural Resources Agency, 2018. *Safeguarding California Plan: 2018 Update*. Available: <https://files.resources.ca.gov/climate/safeguarding/>. Accessed September 21, 2021.

century. The last 5-year period (2014–2018) is the warmest on record for the contiguous US,<sup>15</sup> while the 20 warmest years have occurred over the past 22-year period.<sup>16</sup> The AR4<sup>17</sup> indicates that average temperatures in California could rise 5.6°F to 8.8°F by the end of the century, depending on the global trajectory of GHG emissions. According to the Cal-Adapt website, the portion of the State in which the Project area is located could result in an average increase in temperature of approximately 4.2° to 6.9°F by 2070–2090, compared to the baseline period of 1961–1990.<sup>18</sup>

With climate change, extreme heat conditions and heat waves are predicted to impact larger areas, last longer, and have higher temperatures. Heat waves, defined as three or more days with temperatures above 90°F, are projected to occur more frequently by the end of the century. Extreme heat days and heat waves can negatively impact human health. Heat-related illness includes a spectrum of illnesses ranging from heat cramps to severe heat exhaustion and life-threatening heat stroke.<sup>19</sup>

### Wildfires

The hotter and dryer conditions expected with climate change will make forests more susceptible to extreme wildfires. One study found that, if GHG emissions continue to rise, the frequency of extreme wildfires burning over approximately 25,000 acres would increase by nearly 50 percent, and the average area burned Statewide each year would increase by 77 percent, by the year 2100. In the areas that have the highest fire risk, wildfire insurance is estimated to see costs rise by 18 percent by 2055 and the fraction of property insured would decrease.<sup>20</sup>

### Air Quality

Higher temperatures, conducive to air pollution formation, could worsen air quality in California and make it more difficult for the State to achieve air quality standards. Climate change may increase the concentration of ground-level ozone in particular, which can cause breathing problems, aggravate lung diseases such as asthma, emphysema, chronic bronchitis, and cause chronic obstructive pulmonary

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- 15 National Oceanic and Atmospheric Association, Assessing the US Climate in 2018. <https://www.ncei.noaa.gov/news/national-climate-201812>. Accessed September 21, 2021. Published February 6, 2019
- 16 Climate Central, 2019. Available: <https://www.climatecentral.org/gallery/maps/2018-global-temp-review-land-ocean>. Accessed September 21, 2021. Published February 6, 2019.
- 17 Intergovernmental Panel on Climate Change, 2007. *Synthesis Report. Contribution of Working Groups I, II and III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change*. Available: <https://www.ipcc.ch/assessment-report/ar4/>. Accessed September 21, 2021.
- 18 Cal-Adapt, “Climate Tools,” Maps of Projected Changes, Available: <https://cal-adapt.org/tools/>. Accessed September 21, 2021.
- 19 California Environmental Protection Agency, 2013. *Preparing California for Extreme Heat: Guidance and Recommendations*. Available: <https://toolkit.climate.gov/reports/preparing-california-extreme-heat-guidance-and-recommendations>. Accessed September 21, 2021.
- 20 Westerling, Anthony LeRoy. (2018). Wildfire Simulations for the Fourth California Climate Assessment: Projecting Changes in Extreme Wildfire Events with a Warming Climate. *California’s Fourth Climate Change Assessment*, California Energy Commission. Publication number: CCA4-CEC-2018-014.

disease (COPD) but the magnitude of the effect, and therefore, its indirect effects, are uncertain. Emissions from wildfires can lead to excessive levels of particulate matter, ozone, and volatile organic compounds.<sup>21</sup> Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the State.<sup>22</sup>

### Precipitation and Water Supply

There is a high degree of uncertainty with respect to the overall impact of global climate change on future water supplies in California. Studies indicate considerable variability in predicting precise impacts of climate change on California hydrology and water resources. Increasing uncertainty in the timing and intensity of precipitation will challenge the operational flexibility of California’s water management systems. Warmer, wetter winters would increase the amount of runoff available for groundwater recharge; however, this additional runoff would occur at a time when some basins are either being recharged at their maximum capacity or are already full. Conversely, reductions in spring runoff and higher evapotranspiration because of higher temperatures could reduce the amount of water available for recharge.<sup>23</sup>

### Hydrology and Sea-Level Rise

Climate changes could potentially affect: the amount of snowfall, rainfall, and snowpack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide, and high runoff events); sea-level rise and coastal flooding; coastal erosion; and the potential for saltwater intrusion. Sea-level rise can be a product of global warming through two main processes: expansion of sea water as the oceans warm and melting of ice over land. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California’s water supply. Sea level could rise as much as 2 feet along most of the U.S. coastline. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees to handle storm events.<sup>24</sup>

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- 21 Kenward, A, et al. (2013). *Wildfires and Air Pollution: The Hidden Health Hazards of Climate Change*. Climate Central. Available: <http://assets.climatecentral.org/pdfs/WildfiresAndAirPollution.pdf>. Accessed September 21, 2021.
- 22 California Environmental Protection Agency, 2013. *Preparing California for Extreme Heat: Guidance and Recommendations*. Available: <https://toolkit.climate.gov/reports/preparing-california-extreme-heat-guidance-and-recommendations>. Accessed September 21, 2021.
- 23 California Natural Resources Agency, 2014. *Safeguarding California: Reducing Climate Risk, an Update to the 2009 California Climate Adaptation Strategy*. Available: <https://files.resources.ca.gov/climate/safeguarding/>. Accessed September 21, 2021.
- 24 California Natural Resources Agency, 2014. *Safeguarding California: Reducing Climate Risk, an Update to the 2009 California Climate Adaptation Strategy*. Available: <https://files.resources.ca.gov/climate/safeguarding/>. Accessed September 21, 2021.

## Agriculture

California has a massive agricultural industry that represents 11.3 percent of total US agricultural revenue. Higher carbon dioxide levels can stimulate plant production and increase plant water-use efficiency. However, a changing climate presents significant risks to agriculture due to “potential changes to water quality and availability; changing precipitation patterns; extreme weather events including drought, severe storms, and floods; heat stress; decreased chill hours; shifts in pollinator lifecycles; increased risks from weeds, pest and disease; and disruptions to the transportation and energy infrastructure supporting agricultural production.”<sup>25</sup>

## Ecosystems and Wildlife

Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increased concentrations of GHGs are likely to accelerate the rate of climate change. Scientists expect that the average global surface temperature could rise by 2–11.5°F (1.1–6.4°C) by 2100, with significant regional variation.<sup>26</sup> Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. With climate change, ecosystems and wildlife will be challenged by the spread of invasive species, barriers to species migration or movement in response to changing climatic conditions, direct impacts to species health, and mismatches in timing between seasonal life-cycle events such as species migration and food availability.<sup>27</sup>

### 4.7.2.3 Climate Change Effects for California

In 2016, the CNRA released Safeguarding California: Implementation Action Plans<sup>28</sup> in accordance with Executive Order B-30-15,<sup>29</sup> identifying a lead agency to lead adaptation efforts in each sector. In accordance with the 2009 California Climate Adaptation Strategy,<sup>30</sup> the California Energy Commission (CEC) was directed to develop a website on climate change scenarios and impacts that would be beneficial for local decision makers. The information provided on the Cal-Adapt website<sup>31</sup> represents a projection of

26 National Research Council, 2010. *Advancing the Science of Climate Change*. Available: <http://dels.nas.edu/resources/static-assets/materials-based-on-reports/reports-in-brief/Science-Report-Brief-final.pdf>.

26 National Research Council, 2010. *Advancing the Science of Climate Change*. Available: <http://dels.nas.edu/resources/static-assets/materials-based-on-reports/reports-in-brief/Science-Report-Brief-final.pdf>.

27 California Natural Resources Agency, 2014. *Safeguarding California: Reducing Climate Risk, an Update to the 2009 California Climate Adaptation Strategy*. Available: <https://files.resources.ca.gov/climate/safeguarding/>. Accessed September 21, 2021.

28 California Natural Resources Agency, *Safeguarding California: Implementation Action Plans*, Available: <https://resources.ca.gov/CNRALegacyFiles/docs/climate/safeguarding/Safeguarding%20California-Implementation%20Action%20Plans.pdf>. Accessed September 21, 2021.

29 California Office of the Governor, California EO B-30-15: Establishing 2030 CA emissions target, Adaptation initiatives. April 29, 2015.

30 California Natural Resources Agency, 2009 *California Climate Adaptation Strategy, A Report to the Governor of the State of California in Response to Executive Order S-13-2008*. [https://resources.ca.gov/CNRALegacyFiles/docs/climate/Statewide\\_Adaptation\\_Strategy.pdf](https://resources.ca.gov/CNRALegacyFiles/docs/climate/Statewide_Adaptation_Strategy.pdf). Accessed September 21, 2021.

31 Cal-Adapt. Available: <http://cal-adapt.org>. Accessed September 21, 2021.

potential future climate scenarios comprised of local average values for temperature, sea-level rise, snowpack, and other data representative of a variety of models and scenarios, including potential social and economic factors.

Climate change could affect environmental conditions in California in a variety of ways. One effect of climate change is rising sea levels. Sea levels along the California coast rose approximately 7 inches during the last century, and they are predicted to rise an additional 7 to 22 inches by 2100, depending on the future levels of GHG emissions. The effects of a rise in sea level could include increased coastal flooding, saltwater intrusion (especially a concern in the low-lying Sacramento–San Joaquin Delta, where pumps delivering potable water to Southern California could be threatened), and disruption of wetlands.

As the State’s climate changes over time, the range of various plant and wildlife species could shift or be reduced, depending on the favored temperature and moisture regimes of each species. In the worst cases, some species would become extinct or be extirpated from the State if suitable conditions are no longer available. Additional concerns associated with climate change include a reduction in the snowpack, leading to less overall water storage in the mountains (the largest “reservoir” in the State), and increased risk of wildfires caused by changes in rainfall patterns and plant communities. Changes in the climate can also impact California’s weather patterns and rainfall, causing droughts in certain areas and flooding in others.

### 4.7.2.4 Sources of Greenhouse Gas Emissions

GHGs are the result of both natural and anthropogenic activities. With respect to anthropogenic activities, motor vehicle travel, air travel, consumption of fossil fuels for power generation, industrial processes, heating and cooling, landfills, agriculture, and wildfire are the primary sources of GHG emissions. Additionally, land use decisions can affect the generation of GHG emissions from multiple sectors, resulting in direct or indirect GHG emissions. For example, electricity consumed in the lighting and heating of buildings is an indirect source of GHG emissions because it requires electricity from power plants, which emits GHGs directly into the atmosphere. Conversely, tailpipe emissions from the use of vehicles generate direct GHG emissions.

GHGs are a group of emissions that include CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, and nitrogen trifluoride (NF<sub>3</sub>). Carbon dioxide is the most abundant GHG. As stated above, other GHGs are less abundant, but have higher global warming potential than CO<sub>2</sub>. Thus, emissions of other GHGs are frequently expressed in the equivalent mass of CO<sub>2</sub>; denoted as CO<sub>2</sub>e. A general description of GHGs discussed is provided in **Table 4.7-1: Description of Identified Greenhouse Gases**.

**Table 4.7-1**  
Description of Identified Greenhouse Gases

GHG	General Description
Carbon Dioxide (CO <sub>2</sub> )	An odorless, colorless GHG that has both natural and anthropogenic sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (human caused) sources of CO <sub>2</sub> are burning coal, oil, natural gas, and wood.
Methane (CH <sub>4</sub> )	A flammable gas and is the main component of natural gas. When one molecule of CH <sub>4</sub> is burned in the presence of oxygen, one molecule of CO <sub>2</sub> and two molecules of water are released. A natural source of CH <sub>4</sub> is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain CH <sub>4</sub> , which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.
Nitrous Oxide (N <sub>2</sub> O)	A colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. N <sub>2</sub> O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, race cars, and as an aerosol spray propellant.
Hydrofluorocarbons (HFCs)	Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH <sub>4</sub> or ethane (C <sub>2</sub> H <sub>6</sub> ) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at Earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, the production of CFCs was stopped as required by the Montreal Protocol in 1987. HFCs are synthetic man-made chemicals that are used as substitute for CFCs as refrigerants. HFCs deplete stratospheric ozone, but to a much lesser extent than CFCs.
Perfluorinated Chemicals (PFCs)	PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semi-conductor manufacturing.
Sulfur Hexafluoride (SF <sub>6</sub> )	An inorganic, odorless, colorless, nontoxic, and nonflammable gas. SF <sub>6</sub> is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semi-conductor manufacturing, and as a tracer gas for leak detection.
Nitrogen Trifluoride (NF <sub>3</sub> )	An inorganic, nontoxic, odorless, nonflammable gas. NF <sub>3</sub> is used in the manufacture of semiconductors, as an oxidizer of high energy fuels, for the preparation of tetrafluoro hydrazine, as an etchant gas in the electronic industry, and as a fluorine source in high power chemical lasers.

<sup>a</sup> GHGs identified in this table are ones identified in the Kyoto protocol and other synthetic gases recently added to the IPCC's Fifth Assessment Report.

## 4.7.3 METHODOLOGY

### 4.7.3.1 Methodologies for Evaluating Significance

GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective.<sup>32</sup>

It is the accumulation of GHGs in the atmosphere that may result in global climate change. Climate change impacts are cumulative in nature, and thus no typical single project would result in emission of such a magnitude that it, in and of itself, would be significant on a project basis. A typical single project's GHG emission will be small relative to the total global or even Statewide GHG emissions. Thus, the analysis of significance of potential impacts from GHG emissions related to a single project is already representative of long-term impacts on a cumulative basis.

As such, the assessment of significance is based on a determination of whether the GHG emissions from the proposed Project represent a cumulatively considerable contribution to global climate change. The analysis of the Project's GHG emissions consists of a quantitative analysis of the GHG emissions generated by the proposed Project and a qualitative analysis of the proposed Project's consistency with adopted GHG-related legislation, plans, and policies. This approach is in accordance with CEQA Guidelines Section 15064.4(a), 31F which affirms the discretion of a lead agency to determine, in the context of a particular project, whether to use quantitative and/or qualitative methodologies to determine the significance of a project's impacts.

#### 4.7.3.1 Emissions Inventory Modeling

Project development would generate GHG emissions from a number of individual sources during both construction and post-construction (operational) use of the proposed Project. Intermittent, short-term construction emissions that occur from activities such as demolition, site-grading, construction, paving, and architectural coatings were evaluated. Regulatory models used to estimate GHG impacts include:

- CARB's EMFAC<sup>33</sup> emissions inventory model. EMFAC is the latest emission inventory model that calculates emission inventories and emission rates for motor vehicles operating on roads in California. This model reflects CARB's current understanding of how vehicles travel and how much they emit. EMFAC can be used to show how California motor vehicle emissions have changed over time and are projected to change in the future.

<sup>32</sup> California Air Pollution Control Officers Association, *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*, January 2008, p. 35, Accessed August 2020 at: <http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA-White-Paper.pdf>. Accessed September 21, 2021.

<sup>33</sup> California Air Resources Board, *EMFAC2017 User's Guide*, March 1, 2018, Accessed July 23, 2020 at: <https://ww3.arb.ca.gov/msei/downloads/emfac2017-volume-i-users-guide.pdf> and <https://www.arb.ca.gov/emfac/2017/>. Accessed September 21, 2021.

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- The California Emissions Estimator Model (CalEEMod),<sup>34</sup> is the CARB-approved computer program model recommended by SCAQMD for use in the quantification of air quality and GHG emissions. CalEEMod was developed by SCAQMD, with input from other California air districts. CalEEMod utilizes widely accepted models for emissions estimates combined with appropriate data that can be used if site-specific information is not available. For example, CalEEMod incorporates USEPA-developed emission factors; CARB's on-road and off-road equipment emission models, such as EMFAC and OFFROAD; and studies commissioned by other California agencies, such as the California Energy Commission and CalRecycle.

#### 4.7.3.2 Construction

The proposed Project Construction Scenarios are provided in **Appendix F: ITC Construction Scenarios** and were used to estimate construction GHG associated with the proposed Project.

Construction of the proposed Project would have the potential to temporarily emit GHG emissions through the use of heavy-duty construction equipment and through vehicle trips generated from workers and haul trucks traveling to and from the proposed Project carrying demolition debris, building material and soils.

#### Construction Schedule

The construction phasing as described below represents a conservative set of assumptions for analysis of the maximum potential impacts from construction of the proposed Project. This approach conservatively assumes all construction occurs at the earliest feasible date.

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.

- **Phase 1** would include demolition of buildings and site improvements on properties acquired for construction of the project, the beginning of construction of the MSF, trenching and installation of primary power duct bank, and preparatory work on east side of Prairie Avenue to allow for the roadway shift. Additional work in the area will occur in Phase 4 for the installation of drilled shafts and columns along Prairie Avenue for the guideway. The properties where existing buildings and site improvements will be demolished include at the existing retail commercial center at Market Street and Regent Street, the commercial buildings located at 500 Manchester Boulevard, the commercial building at 150 S. Market Street on the northeast corner of Manchester Boulevard and Market Street, the retail commercial center at northwest corner of Prairie Avenue and Hardy Street, the commercial building at 401 S. Prairie Ave, the commercial building at 945 S. Prairie Avenue, and the commercial

<sup>34</sup> California Emissions Model (CalEEMod®), <http://www.aqmd.gov/caleemod/home>. Accessed September 21, 2021.

#### 4.7 Greenhouse Gas Emissions

building at 1003 S. Prairie Avenue. After demolition, the remaining asphalt flatwork areas at the commercial plaza at Market Street and Regent Street, and the commercial building at 150 S. Market Street, and the retail commercial center at northwest corner of Prairie Avenue and Hardy Street will provide suitable 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 1 construction would start in January 2024.

- **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 2 construction would occur in 2024 through 2025.
- **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 will include utility relocation (if necessary), foundations, cast-in-place (CIP) columns, and setting of prefabricated buildings at the two Power Distribution System (PDS) substations. Phase 3 construction would occur in 2024 through 2025.
- **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 will include utility relocation (if necessary), foundations, CIP columns, guideway column caps, and installation of equipment at the PDS substations. Phase 4 construction would occur in 2025 through 2026.
- **Phase 5** construction 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 will include guideway girders, guideway straddle caps, and installation of equipment at the PDS substations. Phase 5 construction would occur in 2025 through 2026.
- **Phase 6** 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, completion of Prairie Avenue/Manchester Boulevard Station, completion of Prairie Avenue/Hardy Street Station, and completion of the MSF building, and the elevated passenger walkway to the Los Angeles County Metropolitan Transportation Authority (Metro) K Line Downtown Inglewood Station. Phase 6 construction would occur in 2025 through 2026.
- **Phase 7** would include final site work and completion of the stations. Phase 7 would occur in 2026.
- **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. Phase 8 construction would occur in 2025 through 2027, with the primary construction activities occurring in 2026 and some installation of equipment starting towards the end of Phase 3 construction when sufficient aerial structure is available for the installation of the equipment.

Construction activity would occur 24-hours a day seven days a week with primarily heavy construction activities (those involving large equipment use on site) occurring over a 16 hour/day schedule with two shifts: either a morning shift from approximately 7:00 AM to 3:00 PM and an evening shift from

approximately 3:00 PM to 11:00 PM; or a morning shift from approximately 7:00 AM to 3:00 PM and a night shift from approximately 11:00 PM to 7:00 AM. The night shift would be used for material deliveries, export of soil and debris and other light construction activities.

Combinations of these shifts would be referred to “Morning/Evening” or “Morning/Night.” Other minimal construction work could occur during other hours at a reduced intensity. Delivery of construction materials would occur during the night shift, as would most lane closures.

#### 4.7.3.3 Operation

Analysis of the proposed Project’s operational emissions considers five types of sources: 1) area; 2) energy; 3) solid waste; 4) water and wastewater; and 5) mobile. A description of the proposed Project’s various operational components is detailed in **Section 3.0: Project Description**, 3.5: *Project Characteristics*.

##### Area

The operational area emissions from the proposed Project were estimated using the CalEEMod<sup>35</sup> software. Area source emissions associated with normal operations for the proposed Project include on-site activities and upkeep including landscaping equipment. The emissions were estimated using CalEEMod, based on the size of the proposed Project stationary uses (MSF and stations), and the GHG emission factors for fuel combustion.

##### Energy

The operational energy emissions from the proposed Project were estimated using the CalEEMod<sup>36</sup> software and Southern California Edison’s (SCE) average CO<sub>2</sub>e intensity factors. Energy source emissions are generated as a result of activities associated with the MSF and stations which would utilize electricity and natural gas utility infrastructure. Moreover, electricity will be used for propulsion of the ATS system. Propulsion power (i.e., the power to run the ATS train on a guideway and operate the stations) is provided via two PDS substations located along the guideway.

##### Solid Waste

The operational emissions from solid waste associated with the proposed Project’s MSF and stations were estimated using the CalEEMod<sup>37</sup> software. Solid waste generation and associated emissions are calculated based on building square-footage, using default data found in CalEEMod for the proposed land uses.

<sup>35</sup> CalEEMod, <http://www.caleemod.com/>. Accessed September 21, 2021.

<sup>36</sup> CalEEMod, <http://www.caleemod.com/>. Accessed September 21, 2021.

<sup>37</sup> CalEEMod, <http://www.caleemod.com/>. Accessed September 21, 2021.

#### Water and Wastewater

The operational emissions from water consumption and wastewater generation associated with the proposed Project were estimated using the CalEEMod<sup>38</sup> software. California’s water conveyance system is energy intensive, with electricity used to pump and treat water. The Project would result in indirect GHG emissions due to water consumption and wastewater generation. Water consumption and wastewater generation, and their associated emissions, are calculated based on building square-footage, using default CalEEMod data.

##### Mobile

Operation of the proposed Project would generate GHG emissions from mobile sources from Project-generated vehicle trips traveling to and from the MSF and other facilities. Mobile emissions were calculated based on the data provided in the proposed Project’s Transportation Assessment (see **Appendix O: Transportation Assessment**) which is further discussed in **Section 4.12: Transportation**. Under the Transportation Assessment, vehicle miles traveled (VMT) was chosen as the primary performance metric used to identify impacts. VMT associated with trips to and from all areas within the City were included in the Transportation Assessment and were utilized to calculate operational GHG emissions from mobile sources. Emissions from motor vehicles are dependent on vehicle type. Thus, the emissions were calculated using a representative motor vehicle fleet mix for the proposed Project and EMFAC2017 default fuel type. Note that mobile emission estimates did not account for the recently issued Executive Order N-79-20 which sets forth a state goal that 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035, among other goals.

The Adjusted Baseline Environmental Setting is described in **Section 4.0: Environmental Analysis**. Project operations are expected to commence in 2027. Consistent with the Transportation Assessment, six operational scenarios were analyzed to evaluate the proposed Project’s indirect operational emissions, as follows:

<sup>38</sup> CalEEMod, <http://www.caleemod.com/>. Accessed September 21, 2021.

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1. Adjusted Baseline without proposed Project,
2. Adjusted Baseline with the proposed Project,
3. Year 2027 with Event Weekday without the proposed Project,
4. Year 2027 with Event Weekday with the proposed Project,
5. Year 2045 with Event Weekday without the proposed Project, and
6. Year 2045 with Event Weekday with the proposed Project.

Details of each of the above scenarios are provided in **Section 4.12** and in **Appendix O**.

#### **Backup Generators**

To assure the ability to allow ATS trains to reach the nearest stations to offload riders in the event of loss of electrical supply, each PDS substation will be equipped with backup power generators. The proposed Project would include up to two stationary standby generators, on at each of the PDS substations, with an estimated total capacity rated at approximately 4,000 kilowatts (kW) to provide emergency power primarily for ATS train operation, lighting, and other emergency systems. Emergency generator emissions were calculated based on compliance with applicable federal emissions standards and compliance with SCAQMD Rule 1470<sup>39</sup> (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines) mandated emission limits and operating hour constraints.

A standby internal combustion engine (ICE) greater than 50 brake horsepower (bhp) or gas turbine for nonutility power generation that does not operate more than 200 hours a year and is only operated in the event of an emergency power failure or for routine testing and maintenance is considered an emergency backup generator for power generation. The SCAQMD allows for the use of backup generators thru specific permits prior to installation.<sup>40</sup>

The proposed Project would implement the following operational equipment requirements and operation protocols for operating backup generators. These would include the following:

- All backup generators would be selected from the SCAQMD certified generators list and meet applicable federal standards for diesel emissions. For after-treatment of engine exhaust air, a diesel particulate filter would be provided to meet the emission level requirements of SCAQMD;

<sup>39</sup> SCAQMD, *Rule 1470 - Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines*.

<sup>40</sup> SCAQMD, *Permits, Emergency Generators*. <http://www.aqmd.gov/home/permits/emergency-generators>. Accessed September 21, 2021.

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- The proposed Project would have two standby generators, each could operate up to two hours per day and a total of 50 hours per year for testing and maintenance (per SCAQMD Rule 1470 limit) to ensure reliability in the case of a power outage; and
- The proposed Project would conduct maintenance and/or testing on the two standby generators on separate days.

As such, each standby generators would operate for 2 hours per day during 24 days per year (twice a month) for a total of not more than 50 hours per year. Each standby generator would be tested during different days; if needed for emergency operation, both generators would operate up to 2 hours each and could occur simultaneously.

#### **4.7.4 REGULATORY FRAMEWORK**

##### **4.7.4.1 International and Federal**

##### ***International Governmental Panel on Climate Change (IPCC)***

In 1988, the United Nations and the World Meteorological Organization established the IPCC to assess “the scientific, technical and socioeconomic information relevant to understanding the scientific basis of risk of human-induced climate change, its potential impacts, and options for adaption and mitigation.” The initial task for the IPCC was to prepare a comprehensive review and recommendations with respect to the state of knowledge of the science of climate change; the social and economic impact of climate change, and possible response strategies and elements for inclusion in a possible future international convention on climate. Since its inception, the IPCC has delivered five comprehensive scientific reports about climate change, with the latest (the Fifth Assessment Report) released in four parts between September 2013 and November 2014.<sup>41</sup>

##### ***Federal Clean Air Act***

The US Supreme Court ruled in *Massachusetts v. Environmental Protection Agency*<sup>42</sup> that CO<sub>2</sub> and other GHGs are pollutants under the federal Clean Air Act (CAA), which the US Environmental Protection Agency (USEPA) must regulate if it determines they pose an endangerment to public health or welfare.<sup>43</sup> The Court did not mandate that the USEPA enact regulations to reduce GHG emissions. Instead, the Court found that

<sup>41</sup> Intergovernmental Panel on Climate Change (IPCC), *Climate Change 2014-Mitigation of Climate Change, Working Group III Contribution to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*, 2014, p. 439.

<sup>42</sup> *Massachusetts v. Environmental Protection Agency*, 127 S.Ct. 1438 (2007).

<sup>43</sup> Perry W. Payne and Sara Rosenbaum, “Massachusetts et al. v Environmental Protection Agency: Implications for Public Health Policy and Practice,” *Public Health Reports 122 No. 6 (2007): 817–819*, <https://doi.org/10.1177/0033354907112200614>. Accessed September 21, 2021.

the USEPA could avoid taking action if it found that GHGs do not contribute to climate change or if it offered a “reasonable explanation” for not determining that GHGs contribute to climate change.

On April 17, 2009, the USEPA issued a proposed finding that GHGs contribute to air pollution that may endanger public health or welfare. On April 24, 2009, the proposed rule was published in the Federal Register under Docket ID No. EPA-HQ-OAR-2009-0171.<sup>44</sup> The USEPA Stated that high atmospheric levels of GHGs “are the unambiguous result of human emissions and are very likely the cause of the observed increase in average temperatures and other climatic changes.” The USEPA further found that “atmospheric concentrations of greenhouse gases endanger public health and welfare within the meaning of Section 202 of the Clean Air Act.” The final rule was effective on January 14, 2010.<sup>45</sup> While these findings alone did not impose any requirements on industry or other entities, this action was a prerequisite to regulatory actions by the EPA, including, but not limited to, GHG emissions standards for light-duty vehicles.

In response, the USEPA promulgated a regulation to require reporting of all GHG emissions from all sectors of the economy. The final rule applies to fossil fuel suppliers and industrial gas suppliers, direct greenhouse gas emitters and manufacturers of heavy-duty and off-road vehicles and engines. The rule does not require control of greenhouse gases; rather, it requires only that sources above certain threshold levels monitor and report emissions.<sup>46</sup>

### USEPA Actions

USEPA has taken the following actions to regulate, monitor, and potentially reduce GHG emissions.

#### Mandatory Greenhouse Gas Reporting Rule

On September 22, 2009, the USEPA issued a rule for mandatory reporting of GHGs from large GHG emissions sources in the United States.<sup>47</sup> In general, this national reporting requirement provides USEPA with accurate and timely GHG emissions data from facilities that emit 25,000 metric tons (MT) or more of CO<sub>2</sub> per year and allows the operators of these facilities to track their own emissions, compare them to similar facilities, and aid in identifying cost-effective opportunities to reduce emissions in the future. An

<sup>44</sup> Federal Register, *Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act*, <https://www.federalregister.gov/documents/2009/12/15/E9-29537/endangerment-and-cause-or-contribute-findings-for-greenhouse-gases-under-section-202a-of-the-clean>. Accessed September 21, 2021.

<sup>45</sup> United States Environmental Protection Agency (USEPA), *Endangerment and Cause or Contribute Findings for Greenhouse Gases under the Section 202(a) of the Clean Air Act*, <https://www.epa.gov/climate-change/endangerment-and-cause-or-contribute-findings-greenhouse-gases-under-section-202a>. Accessed September 21, 2021.

<sup>46</sup> Federal Register, *Mandatory Reporting of Greenhouse Gases*, <https://www.gpo.gov/tdsys/pkg/FR-2009-10-30/pdf/E9-23315.pdf>. Accessed September 21, 2021.

<sup>47</sup> United States Environmental Protection Agency, *Greenhouse Gas Reporting Program (GHGRP)*, <https://www.epa.gov/ghgreporting/additional-information-2009-proposed-rule>. Accessed September 21, 2021.

estimated 85 percent of the total US GHG emissions from approximately 10,000 facilities are covered by this rule.

#### Endangerment and Cause or Contribute Findings for Greenhouse Gases under the CAA

On December 7, 2009, USEPA adopted its Proposed Endangerment and Cause or Contribute Findings for Greenhouse Gases under Section 202(a) of the Compliance Certification Application (Endangerment Finding).<sup>48</sup> These include:

- Endangerment Finding: The Administrator finds that the current and projected concentrations of the six key well-mixed GHGs—carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>)—in the atmosphere threaten the public health and welfare of current and future generations.
- Cause or Contribute Finding: The Administrator finds that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution, which threatens public health and welfare.

These findings do not themselves impose any requirements on industry or other entities. However, this action is a prerequisite to finalizing the proposed USEPA GHG standards for light-duty vehicles. These standards were jointly proposed by USEPA and the Department of Transportation National Highway Traffic Safety Administration (NHTSA), and the final rule became effective January 14, 2010. In collaboration with the NHTSA, USEPA finalized emission standards for light-duty vehicles (2012–2016 model years) in May 2010 and for heavy-duty vehicles (2014–2018 model years) in August 2011. Furthermore, the agencies finalized standards to extend the light-duty vehicle GHG National Program for model years 2017–2025. The standards are estimated to cut GHG emissions from cars and light trucks in half by 2025, reducing emissions by 6 billion metric tons over the life of the program—more than the total amount of CO<sub>2</sub> emitted by the United States in 2010.

#### Greenhouse Gases and Fuel Efficiency Standards

##### Passenger Cars and Light-Duty Trucks

In October 2012, the USEPA and NHTSA finalized the second phase of a coordinated National Program to establish GHG standards and Corporate Average Fuel Economy (CAFE) standards for new model years 2017 through 2021 passenger cars, light-duty trucks, and medium-duty passenger vehicles, and issued

<sup>48</sup> United States Environmental Protection Agency, *Endangerment and Cause or Contribute Findings for Greenhouse Gases under the Section 202(a) of the Clean Air Act*, <https://www.epa.gov/climate-change/endangerment-and-cause-or-contribute-findings-greenhouse-gases-under-section-202a>. Accessed September 21, 2021.

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standards for model year 2022 through 2025 following direction from the Obama Administration.<sup>49</sup> The agencies developed the second phase of the coordinated National Program for GHG emissions and fuel efficiency standards following the successful adoption of the first phase for model year 2012-2016 light-duty vehicles in April 2010. Under the second phase standards, CO<sub>2</sub> emission limits would decrease from 250 grams per mile (g/mi) in model year 2016 to 163 g/mi in model year 2025 for a combined fleet of cars and light trucks, equivalent to 54.5 mpg if this level were achieved solely through fuel efficiency improvements. If all of the necessary emission reductions were made from fuel economy improvements, then the standards would correspond to a combined fuel economy of 40.3-41 mpg in 2021 for the first phase of NHTSA rulemaking action and 48.7-49.7 mpg in 2025 for the second phase. In March 2020, the Trump Administration issued the *Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks* (SAFE Vehicles Rule), setting fuel economy and carbon dioxide standards that increase 1.5 percent in stringency each year from model years 2021 through 2026.<sup>50</sup>

#### Medium- and Heavy-Duty Engines and Vehicles

In October 2016, the USEPA and NHTSA announced a comprehensive Phase 2 Heavy-Duty (HD) National Program to reduce GHG emissions and to improve fuel efficiency for medium- and heavy-duty vehicles through model year 2027, with interim standards for model years 2021 and 2024.<sup>51</sup> The agencies developed the second phase of the HD National Program following the early success of and broad support for the first phase National Program for model years 2014-2018 new medium and heavy-duty vehicles in August 2011, which set to reduce GHG emissions by 270 million metric tons and oil consumption by 530 million barrels over the life of the affected vehicles. On October 17, 2017, USEPA announced it would revisit these standards; however, no changes to the 2016 standards have been made as of October 2020.

#### Federal Energy Policy and Conservation Acts

The Federal Energy Policy and Conservation Act of 1975, the Federal Energy Policy Act of 2005, and the Energy Independence and Security Act of 2007 require the U.S. Department of Energy (DOE) to set electrical efficiency standards for various appliances, fixtures, and equipment. Specifically, the Energy Independence and Security Act of 2007 includes standards for an increased CAFE standard of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by the 2020 model year, in addition to the

49 U.S. Environmental Protection Agency (USEPA), *Regulations for Emissions from Vehicles and Engines*, “Final Rule for Model Year 2017 and Later Light-Duty Vehicle Greenhouse Gas Emissions and Corporate Average Fuel Economy Standards,” October 15, 2012, <https://www.gpo.gov/fdsys/pkg/FR-2012-10-15/pdf/2012-21972.pdf>. Accessed September 21, 2021.

50 National Highway Traffic Safety Administration, “The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021–2026 Passenger Cars and Light Trucks,” <https://www.federalregister.gov/documents/2020/04/30/2020-06967/the-safer-affordable-fuel-efficient-safe-vehicles-rule-for-model-years-2021-2026-passenger-cars-and>. Accessed September 21, 2021.

51 USEPA, *Regulations for Emissions from Vehicles and Engines*, “Final Rule for Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles - Phase 2,” October 25, 2016, <https://www.gpo.gov/fdsys/pkg/FR-2016-10-25/pdf/2016-21203.pdf>. Accessed September 21, 2021.

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following provisions: Renewable Fuel Standard (RFS) (Section 202), Appliance and Lighting Efficiency Standards (Sections 301–325) and Building Energy Efficiency (Sections 411–441). The Act includes standards for general service lighting that will require lightbulbs to consume 60 percent less energy by 2020. This standard is leading to the phasing out of incandescent lightbulbs to be replaced by more efficient lighting. Additional provisions of the Act address energy savings in government and public institutions, promote research for alternative energy, carbon capture, and international energy programs, and create green jobs.

#### Energy Independence and Security Act

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

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

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of “green jobs.”<sup>52</sup>

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

#### 4.7.4.2 State Regulations and Directives

##### Executive Orders

###### Executive Order S-03-05

Executive Order S-3-05, signed by Governor Arnold Schwarzenegger and issued in June 2005, proclaimed that California is vulnerable to the impacts of climate change.<sup>53</sup> It declared that increased temperatures could reduce the Sierra snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the Executive Order established the following total GHG emission targets:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

Executive Order S-3-05 also created the California Climate Action Team (CAT), an initiative of the Office of the Governor comprised of members from 14 State agencies, in order to coordinate climate policy and meeting agency targets at the State level. CAT has identified strategies that integrate transportation and land-use decisions, termed "smart land use." Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population. "Intelligent transportation systems" is the application of advanced technology systems and management strategies to improve operational efficiency of transportation systems and the movement of people, goods, and service.<sup>54</sup>

###### Executive Order S-01-07

Executive Order S-1-07, the Low Carbon Fuel Standard (issued on January 18, 2007), requires a reduction of at least 10 percent in the carbon intensity of California's transportation fuels by 2020.<sup>55</sup> Regulatory proceedings and implementation of the Low Carbon Fuel Standard have been directed to CARB. CARB has identified the Low Carbon Fuel Standard as a discrete early action item in the adopted Climate Change Scoping Plan (discussed below). CARB expects the Low Carbon Fuel Standard to achieve the minimum 10 percent reduction goal; however, many of the early action items outlined in the Climate Change Scoping

<sup>53</sup> California Office of the Governor, California Executive Order S-3-05, June 1, 2005.

<sup>54</sup> California Environmental Protection Agency, *Climate Action Team Report to Governor Schwarzenegger and the Legislature* (March 2006), 58, <http://s3-us-west-2.amazonaws.com/uclidc-nuxeo-ref-media/0bdec21c-ca2b-4f4d-9e11-35935ac4cf5f>, Accessed September 21, 2021.

<sup>55</sup> Office of the Governor, *Executive Order S-01-07*, (January 18, 2007), <https://climateactionnetwork.ca/wp-content/uploads/2011/06/eos0107.pdf>. Accessed September 21, 2021.

Plan work in tandem with one another. Other specific emission reduction measures included are the Million Solar Roofs Program<sup>56</sup> and Assembly Bill (AB) 1493 (Pavley I), Vehicle Emissions: Greenhouse Gases, which establishes motor vehicle GHG emissions standards.<sup>57</sup> To avoid the potential for double-counting emission reductions associated with AB 1493, the Climate Change Scoping Plan has modified the aggregate reduction expected from the Low Carbon Fuel Standard to 9.1 percent. CARB released a draft version of the Low Carbon Fuel Standard in October 2008. The final regulation was approved by the Office of Administrative Law and filed with the Secretary of State on January 12, 2010; the Low Carbon Fuel Standard became effective on the same day.

###### Executive Order B-30-15

Executive Order B-30-15, signed by Governor Edmund Gerald "Jerry" Brown and issued on April 29, 2015, established a new Statewide policy goal to reduce GHG emissions to 40 percent below their 1990 levels by 2030. Furthering advancing the targets of AB 32, reducing GHG emissions by 40 percent below 1990 levels in 2030, and by 80 percent below 1990 levels by 2050 (consistent with Executive Order S-3-05), aligns with scientifically established levels needed to limit global warming to less than 2 degrees Celsius.<sup>58</sup>

###### Executive Order N-79-20

On September 23, 2020, Governor Gavin Newsom issued Executive Order N-79-20 which relates to issues surrounding GHG emissions generated from vehicular transportation and fossil fuel production in California. This Executive Order builds on previous orders issued by former Governor Jerry Brown in 2012 and 2018, which set state goals, respectively of 1.5 million zero-emission vehicles by 2025 and 5 million zero-emission vehicles by 2030. Executive Order N-79-20 sets the following goals in addition to current state goals:

- 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035;
- 100 percent of medium- and heavy-duty vehicles in the State will be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks; and
- 100 percent zero-emission off-road vehicles and equipment by 2035 where feasible.<sup>59</sup>

<sup>56</sup> US Department of Energy, "Laying the Foundation for Solar America: The Million Solar Roofs Initiative" (October 2016), <https://www.nrel.gov/docs/fy07osti/40483.pdf>. Accessed September 21, 2021.

<sup>57</sup> The standards enacted in Pavley I are the first GHG standards in the nation for passenger vehicles and took effect for model years starting in 2009 to 2016. Pavley I could potentially result in 27.7 million metric tons CO<sub>2</sub>e reduction in 2020. Pavley II will cover model years 2017 to 2025 and potentially result in an additional reduction of 4.1 million metric tons CO<sub>2</sub>e.

<sup>58</sup> California Office of the Governor, *Governor Brown Established Most Ambitious Greenhouse Gas Reduction Target in North America*, (April 29, 2015), <https://www.ca.gov/archive/gov39/2015/04/29/news18938/index.html>. Accessed September 21, 2021.

<sup>59</sup> California Office of the Governor, *Executive Order N-79-20*, Available: <https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf>. Accessed September 21, 2021.

### **Assembly Bill 32, California Global Warming Solutions Act of 2006**

AB 32, the Global Warming Solutions Act of 2006, required a sharp reduction of GHG emissions to 1990 levels by 2020. To achieve these goals, AB 32 mandated that CARB establish a quantified emissions cap and institute a schedule to meet the cap; implement regulations to reduce Statewide GHG emissions from stationary sources consistent with the California Climate Action Team strategies; and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. To reach the reduction targets, AB 32 required CARB to adopt—in an open, public process—rules and regulations that achieve the maximum technologically feasible and cost-effective GHG reductions.

### **Assembly Bill 197 and Senate Bill 32: Statewide Reductions in GHG Emissions**

On September 8, 2016, Governor Brown signed AB 197, which requires CARB to approve a Statewide GHG emissions limit equivalent to the Statewide GHG emission level in 1990 to be achieved by 2030. AB 197 requires the CARB to prepare and approve a scoping plan for achieving the maximum technologically feasible and cost-effective reductions in GHG emissions. The bill became effective on January 1, 2017.

On September 8, 2016, Governor Brown also signed Senate Bill (SB) 32, which extends AB 32 another 10 years to 2030 and updates the State's objectives. SB 32 calls for Statewide reductions in GHG emissions to 40 percent below 1990 levels by 2030. The bill became effective on January 1, 2017.<sup>60</sup>

### **Assembly Bill 1493 – Pavley**

Enacted on July 22, 2002, the California's Greenhouse Gas Vehicle Emission Standards under Assembly Bill 1493 of 2002<sup>61</sup> required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light-duty trucks. Regulations adopted by CARB apply to 2009 through 2016 vehicles. CARB estimated that the regulation would reduce GHG emissions from the light-duty and passenger vehicle fleet by an estimated 18 percent in 2020 and by 27 percent in 2030. In 2011, the U.S. Department of Transportation, USEPA, and State of California announced a single timeframe for proposing fuel and economy standards, thereby aligning the Pavley standards with the federal standards for passenger cars and light-duty trucks.<sup>62</sup> Emission estimates included in this analysis account for the Pavley standards.

<sup>60</sup> California Legislative Information, *Senate Bill No. 32*, [https://leginfo.ca.gov/faces/billNavClient.xhtml?bill\\_id=2015201605B32](https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=2015201605B32). Accessed September 22, 2021.

<sup>61</sup> CARB, *California's Greenhouse Gas Vehicle Emission Standards under Assembly Bill 1493 of 2002 (Pavley)*, <https://ww2.arb.ca.gov/californias-greenhouse-gas-vehicle-emission-standards-under-assembly-bill-1493-2002-pavley>. Accessed September 22, 2021.

<sup>62</sup> U.S. Department of Transportation, "EPA, DOT and California Align Timeframe for Next Generation of Clean Cars," April 18, 2012, available at <https://www.transportation.gov/briefing-room/epa-dot-and-california-align-timeframe-proposing-standards-next-generation-clean-cars>. Accessed September 22, 2021.

### **Senate Bill 375, Sustainable Communities and Climate Protection Act**

SB 375, signed into law in September 2008, aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations.<sup>63</sup> The act requires metropolitan planning organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy (APS) that prescribes land use allocation in that MPO's Regional Transportation Plan (RTP). CARB, in consultation with MPOs, provided regional reduction targets for GHGs for the years 2020 and 2035.

### **Senate Bill X1-2: 2020 Renewable Portfolio Standard**

On April 12, 2011, California Governor Jerry Brown signed SB X1-2.<sup>64</sup> This bill supersedes the 33 percent by RPS created by Executive Order S-14-08, previously signed by Governor Schwarzenegger. The RPS required that all retail suppliers of electricity in California serve 33 percent of their load with renewable energy by 2020. A number of significant changes are made in SB X1-2. It extends application of the RPS to all electric retailers in the State, including municipal and public utilities, and community choice aggregators.

SB X1-2 creates a three-stage compliance period for electricity providers to meet renewable energy goals: 20 percent of retail sales must be renewable energy products by 2013, 25 percent of retail sales must be renewable energy products by 2016, and 33 percent of retail sales must be renewable energy products by 2020. The 33 percent level must be maintained in the years that follow. This three-stage compliance period requires the RPS to be met increasingly with renewable energy that is supplied to the California grid and is located within or directly proximate to California. SB X1-2 mandates that renewables from this category make up:

- At least 50 percent for the 2011–2013 compliance period;
- At least 65 percent for the 2014–2016 compliance period; and
- At least 75 percent for 2016 and beyond.

SB X1-2 sets rules for the use of Renewable Energy Credits (RECs) as follows:

- Establishes a cap of no more than 25 percent unbundled RECs going toward the RPS between 2011 and 2013, 15 percent from 2014 to 2016, and 10 percent thereafter;
- Does not allow for the grandfathering of tradable REC contracts executed before 2010, unless the contract was (or is) approved by the California Public Utilities Commission (CPUC);

<sup>63</sup> California Legislative Information, *Senate Bill No. 375*, [https://leginfo.ca.gov/faces/billNavClient.xhtml?bill\\_id=2007200805B375](https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=2007200805B375). Accessed September 22, 2021.

<sup>64</sup> California Energy Commission, *Renewable Portfolio Standard*, <http://www.energy.ca.gov/portfolio>. Accessed September 22, 2021.

- Allows banking of RECs for 3 years only; and
- Allows energy service providers, community choice aggregators, and investor-owned utilities with 60,000 or fewer customers to use 100 percent RECs to meet the RPS.

SB X1-2 also eliminates the Market Price Referent, which was a benchmark to assess the above-market costs of RPS contracts based on the long-term ownership, operating, and fixed-price fuel costs for a new 500-megawatt (mW) natural-gas-fired, combined-cycle gas turbine.

### **Senate Bill 350: Clean Energy and Pollution Reduction Act**

SB 350, the Clean Energy and Pollution Reduction Act of 2015, was signed on October 7 of that year.<sup>65</sup> SB 350 implements some of the goals of Executive Order B-30-15 described above. The objectives of SB 350 are: (1) to increase the procurement of our electricity from renewable sources from 33 percent to 50 percent; and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.<sup>66</sup>

### **Senate Bill 1078 and Senate Bill 107**

Established in 2002 under SB 1078, the California Renewables Portfolio Standards (RPS) were accelerated in 2006 under SB 107, which required that, by 2010, at least 20 percent of electricity retail sales come from renewable sources. In April 2016, the CEC updated the RPS pursuant to SB 350, intended to set the new target 50 percent renewables by 2030.<sup>67</sup>

### **Senate Bill 97**

SB 97, signed in August 2007, acknowledged that climate change is an environmental issue requiring analysis under CEQA. This bill directed the Governor's Office of Planning and Research (OPR) to prepare, develop, and transmit to the CNRA guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions, as required by CEQA, no later than July 1, 2009. SB 97 required the CNRA to certify or adopt those guidelines by January 1, 2010. On December 30, 2009, the Natural Resources Agency adopted amendments to the CEQA Guidelines. The CEQA Guidelines amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of GHG emissions in draft CEQA documents. The amendments became effective March 18, 2010.

<sup>65</sup> California Legislative Information, *Senate Bill No. 350*, [https://leginfo.ca.gov/faces/billNavClient.xhtml?bill\\_id=201520160SB350](https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB350). Accessed September 22, 2021.

<sup>66</sup> Senate Bill 350 (2015–2016 Reg. Session) Stats 2015, ch. 547.

<sup>67</sup> California Energy Commission, *Enforcement Procedures for the Renewables Portfolio Standards for Local Publicly Owned Electric Utilities: Amended Regulations*, <http://www.energy.ca.gov/2016publications/CEC-300-2016-002/CEC-300-2016-002-CMF.pdf>. Accessed September 22, 2021.

### **CEQA Guidelines**

CEQA Guidelines section 15064.4 addresses the significance of GHG emissions, directing that a lead agency shall make a “good-faith effort” to “describe, calculate or estimate” GHG emissions in CEQA environmental documents.<sup>68</sup> Section 15064.4 further states that the analysis of GHG impacts should include consideration of (1) the extent to which the project may increase or reduce GHG emissions, (2) whether the project GHG emissions would exceed a threshold of significance that the lead agency determines applies to the project, and (3) the extent to which the project would comply with “regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.”

The CEQA Guidelines focus on the effects of GHG emissions as cumulative impacts, and direct that they should be analyzed in the context of CEQA's requirements for cumulative impact analysis.<sup>69</sup> CEQA Guidelines section 15064.4 states that “the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national, or global emissions. The agency's analysis should consider a timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes.” The CEQA Guidelines also establish that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including plans or regulations for the reduction of GHG emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located (CEQA Guidelines section 15064(h)(3)).

The CEQA Guidelines do not require or recommend a specific analytical methodology or provide quantitative criteria for determining the significance of GHG emissions, nor do they set a numerical threshold of significance for GHG emissions. Guideline 15064.7(c) clarifies that in adopting or using thresholds of significance, a lead agency may appropriately consider thresholds developed by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.

<sup>68</sup> California Natural Resources Agency, *CEQA Guidelines Amendments, Sections 15064.4, 15183.5, 15364.5*. Available: [http://resources.ca.gov/ceqa/docs/2018\\_CEQA\\_FINAL\\_TEXT\\_122818.pdf](http://resources.ca.gov/ceqa/docs/2018_CEQA_FINAL_TEXT_122818.pdf). Accessed September 22, 2021.

<sup>69</sup> California Natural Resources Agency, *Final Statement of Reasons for Regulatory Action*, December 2009, pp. 20-26. Available: [http://resources.ca.gov/ceqa/docs/Final\\_Statement\\_of\\_Reasons.pdf](http://resources.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf). Accessed September 22, 2021.

#### 4.7 Greenhouse Gas Emissions

When GHG emissions are found to be significant, CEQA Guidelines section 15126.4(c) includes the following direction on measures to mitigate GHG emissions:

Consistent with section 15126.4(a), lead agencies shall consider feasible means, supported by substantial evidence and subject to monitoring or reporting, of mitigating the significant effects of greenhouse gas emissions. Measures to mitigate the significant effects of greenhouse gas emissions may include, among others:

1. Measures in an existing plan or mitigation program for the reduction of emissions that are required as part of the lead agency's decision;
2. Reductions in emissions resulting from a project through implementation of project features, project design, or other measures;
3. Off-site measures, including offsets that are not otherwise required, to mitigate a project's emissions;
4. Measures that sequester greenhouse gases; and
5. In the case of the adoption of a plan, such as a general plan, long range development plan, or plans for the reduction of greenhouse gas emissions, mitigation may include the identification of specific measures that may be implemented on a project-by project basis. Mitigation may also include the incorporation of specific measures or policies found in an adopted ordinance or regulation that reduces the cumulative effect of emissions.

In late 2018, the CNRA finalized amendments to the CEQA Guidelines, including changes to CEQA Guidelines section 15064.4, which addresses the analysis of GHG emissions. The amendments were approved by the Office of Administrative Law and filed with the Secretary of State. The amendments became effective on December 28, 2018. The revision of CEQA Guidelines section 15064.4 clarified several points, including the following:

- Lead agencies must analyze the GHG emissions of proposed projects.
- The focus of the lead agency's analysis should be on the project's effect on climate change, rather than simply focusing on the quantity of emissions and how that quantity of emissions compares to statewide or global emissions.
- The impacts analysis of GHG emissions is global in nature and thus should be considered in a broader context. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national, or global emissions.
- Lead agencies should consider a timeframe for the analysis that is appropriate for the project.
- A lead agency's analysis must reasonably reflect evolving scientific knowledge and state regulatory schemes.

#### 4.7 Greenhouse Gas Emissions

- Lead agencies may rely on plans prepared pursuant to section 15183.5 (Plans for the Reduction of Greenhouse Gases) in evaluating a project's greenhouse gas emissions.
- In determining the significance of a project's impacts, the lead agency may consider a project's consistency with the state's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is consistent with those plans, goals, or strategies.
- The lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use.

#### **Senate Bill 862 (Transit and Intercity Rail Capital Program)**

The Transit and Intercity Rail Capital Program (TIRCP) was created by SB 862 (Chapter 36, Statutes of 2014) and modified by Senate Bill 9 (Chapter 710, Statutes of 2015) to provide grants from the Greenhouse Gas Reduction Fund to fund transformative capital improvements that will modernize California's intercity, commuter, and urban rail systems, and bus and ferry transit systems to reduce emissions of greenhouse gases by reducing congestion and vehicle miles traveled throughout California. The goal of the TIRCP is to provide monies to fund transformative capital improvements that modernize California's intercity rail, bus, ferry, and rail transit systems to achieve the following objectives:

- Reduction in greenhouse gas emissions;
- Expand and improve rail service to increase ridership;
- Integrate the rail service of the State's various rail operations, including integration with the high-speed rail system; and
- Improve safety

#### **Climate Change Scoping Plan**

CARB approved a Climate Change Scoping Plan (Scoping Plan) on December 11, 2008, as required by AB 32. The Scoping Plan proposed a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health."<sup>70</sup> The Scoping Plan had a range of GHG reduction actions, including direct regulations; alternative compliance mechanisms; monetary and

<sup>70</sup> CARB, *Climate Change Scoping Plan: A Framework for Change*, [https://www.arb.ca.gov/cc/scopingplan/document/adopted\\_scoping\\_plan.pdf](https://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf). Accessed September 22, 2021.

#### 4.7 Greenhouse Gas Emissions

nonmonetary incentives; voluntary actions; market-based mechanisms, such as a cap-and-trade system; and an AB 32 implementation regulation to fund the program.

The Scoping Plan called for a “coordinated set of strategies” to address all major categories of GHG emissions.<sup>71</sup> Transportation emissions were to be addressed through a combination of higher standards for vehicle fuel economy, implementation of the Low Carbon Fuel Standard,<sup>72</sup> and greater consideration to reducing trip length and generation through land use planning and transit-oriented development. Buildings, land use, and industrial operations were encouraged and, sometimes, required to implement energy efficiency practices. Utility energy supplies will change to include more renewable energy sources through implementation of the Renewables Portfolio Standard. This will be complemented with emphasis on local generation, including rooftop photovoltaics and solar hot water installations. Additionally, the Scoping Plan emphasized opportunities for households and businesses to save energy and money through increasing energy efficiency. It indicated that substantial savings of electricity and natural gas would be accomplished through improving energy efficiency.

CARB updated the Scoping Plan in May 2014 (2014 Scoping Plan). The 2014 Scoping Plan<sup>73</sup> adjusted the 1990 GHG emissions levels to 431 million metric tons of carbon dioxide equivalents (MMTCO<sub>2</sub>e); the updated 2020 GHG emissions forecast is 509 MMTCO<sub>2</sub>e, which credited for certain GHG emission reduction measures already in place (e.g., the RPS). The 2014 Scoping Plan also recommended a 40 percent reduction in GHG emissions from 1990 levels by 2030, and a 60 percent reduction in GHG emissions from 1990 levels by 2040.

The 2017 Scoping Plan,<sup>74</sup> approved on December 14, 2017, builds on previous programs, and takes aim at the 2030 target established by the SB 32, which is further discussed below. The 2017 Scoping Plan outlines options to meet California’s aggressive goals to reduce GHGs by 40 percent below 1990 levels by 2030. In addition, the plan incorporates the State’s updated RPS requiring utilities to procure 50 percent of their electricity from renewable energy sources by 2030. It also raises the State’s Low Carbon Fuel Standard<sup>75</sup> and aims to reduce emissions of methane and hydrofluorocarbons by 40 percent from 2013 levels by 2030 and emissions of black carbon by 50 percent from 2013 levels.

<sup>71</sup> CARB, *Climate Change Scoping Plan*, p. ES-7.

<sup>72</sup> Office of the Governor, Executive Order S-01-07, (January 18, 2007), <https://www.arb.ca.gov/fuels/lcfs/eos0107.pdf>. Accessed September 22, 2021.

<sup>73</sup> CARB, *First Update to the Climate Change Scoping Plan: Building on the Framework (May 2014)*.

<sup>74</sup> CARB, *California’s 2017 Climate Change Scoping Plan*, [https://www.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf). Accessed September 22, 2021.

<sup>75</sup> Office of the Governor, Executive Order S-01-07, (January 18, 2007), <https://www.arb.ca.gov/fuels/lcfs/eos0107.pdf>. Accessed September 22, 2021.

#### 4.7 Greenhouse Gas Emissions

The 2017 Scoping Plan<sup>76</sup> advises that absent conformity with a qualified GHG reduction plan, projects should incorporate all feasible GHG reduction measures and that achieving “no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development.”

#### Cap-and-Trade Program

AB 32 established the goal of reducing GHG emissions Statewide to 1990 levels by 2020. To help achieve this goal, CARB adopted a regulation to establish a cap-and-trade program that places a “cap” on the aggregate GHG emissions from entities responsible for roughly 85 percent of the State’s GHG emissions. As part of the cap-and-trade program, CARB conducts quarterly auctions where it sells emission allowances. Revenues from the sale of these allowances fund projects that support the goals of AB 32, including transit and rail investments.

On October 20, 2011, CARB’s board adopted the final cap-and-trade regulation; the program began on January 1, 2012. The scope of GHG emission sources subject to cap-and-trade in the first compliance period (2013–2014) included all electricity generated and imported into California, and large industrial facilities emitting more than 25,000 metric tons of carbon dioxide equivalents (MTCO<sub>2</sub>e) per year (e.g., oil refineries and cement manufacturers). The scope of GHG emission sources subjected to cap-and-trade during the second compliance period (2015–2017) expands to include distributors of transportation fuels (including gasoline and diesel), natural gas, and other fuels.

#### California Advanced Clean Cars/Zero Emission Vehicle Program

In 2012, CARB approved the Advanced Clean Cars (ACC) program, a new emissions-control program for vehicle model years 2017–2025. The program combines the control of smog, soot, and GHGs with requirements for greater number of zero-emission vehicles. By 2025, when the rules will be fully implemented, automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog forming emissions.<sup>77</sup>

#### California Energy Commission

##### California Building Energy Efficiency Standards (Title 24, Part 6)

California’s Energy Efficiency Standards for Residential and Nonresidential Buildings, found in Title 24, Part 6 of the California Code of Regulations (CCR) and commonly referred to as “Title 24,” were established in

<sup>76</sup> California Air Resources Board, 2017. *California’s 2017 Climate Change Scoping Plan*. pp. 100-101. Available: [www.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf). Accessed September 22, 2021.

<sup>77</sup> CARB, *The Advanced Clean Cars Program*, (January 18, 2017), <https://www.arb.ca.gov/msprog/acc/acc.htm>. Accessed September 22, 2021.

1978 in response to a legislative mandate to reduce California’s energy consumption. Title 24 requires the design of building shells and components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.<sup>78</sup>

An update to Title 24 was adopted by the CEC on April 23, 2008. The 2008 Title 24 standards applied to building permits for which an application was submitted on or after January 1, 2010. The CEC adopted the changes made in 2008 to the Building Energy Efficiency Standards to respond to the mandates of AB 32 and to pursue California energy policy that energy efficiency is the resource of first choice for meeting California’s energy needs. The CEC adopted the Title 24 standards as well as the 2019 Title 24 standards, which became effective on January 1, 2020, and are applicable to the proposed Project.<sup>79</sup>

#### California Green Building Standards (Title 24, Part 11)

The California Green Building Standards Code, which is Part 11 of the CCR, is commonly referred to as the CALGreen Code.<sup>80</sup> The 2008 edition, the first edition of the CALGreen Code, contained only voluntary standards. The 2010 CALGreen Code contains mandatory requirements for State-regulated buildings and structures throughout California beginning on January 1, 2011. The 2010 CALGreen Code contains requirements for construction site selection, stormwater control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation, and more. The 2010 CALGreen Code provides for design options, allowing the designer to determine how best to achieve compliance for a given site or building condition. The 2010 CALGreen Code also requires building commissioning, which is a process for verification that all building systems, such as heating and cooling equipment and lighting systems, are functioning at their maximum efficiency.

The most current version of the CALGreen building code went into effect in January 2020. The purpose is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress facilities, and general stability by regulating and controlling the design, construction, quality of materials, outdoor lighting standards, use and occupancy, location, and maintenance of all building and structures within its jurisdiction.

#### California Appliance Efficiency Regulations (Title 20, Sections 1601 through 1608)

The 2016 Appliance Efficiency Regulations, adopted by the CEC, include standards for new appliances, equipment, and lighting sold or offered for sale in California. These standards include minimum levels of

<sup>78</sup> California Energy Commission, *2019 Building Energy Efficiency Standards*, <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency>. Accessed September 22, 2021.

<sup>79</sup> See California Energy Commission, *2019 Building Energy Efficiency Standards* for additional information.

<sup>80</sup> California Buildings Standards Commission, *California Green Building Standards Code (Cal. Code Regs., Title 24, Part 11)*, <http://www.bsc.ca.gov/Home/CALGreen.aspx>. Accessed September 22, 2021.

operating efficiency and other cost-effective measures to promote the use of energy- and water-efficient appliances.<sup>81</sup>

#### 4.7.4.3 Regional

##### *Southern California Association of Governments*

##### **SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy**

SCAG is the MPO for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for the discussion of regional issues related to transportation, the economy, community development, and the environment. As the federally designated MPO for the Southern California region, SCAG is mandated by the federal government to research and develop plans for transportation, hazardous waste management, and air quality. Pursuant to California Health and Safety Code Section 40460(b),<sup>82</sup> SCAG has the responsibility for preparing and approving the portions of the AQMP relating to regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is also responsible under the CAA for determining conformity of transportation projects, plans, and programs with applicable air quality plans.

With regard to GHG emissions, SCAG has prepared and adopted the 2020–2045 RTP/SCS,<sup>83</sup> which includes a Sustainable Communities Strategy that addresses regional development and growth forecasts. The SCAG 2020–2045 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals, with a specific goal of achieving an 8 percent reduction in passenger vehicle GHG emissions on a per capita basis by 2020, 19 percent reduction by 2035, and 21 percent reduction by 2040 compared to the 2005 level.

##### *South Coast Air Quality Management District*

##### **Policy on Global Warming and Stratospheric Ozone Depletion and General Guidance**

In October 2008, the SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds. SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 MT of GHG per year. On December 5,

<sup>81</sup> California Energy Commission, *2016 Appliance Efficiency Regulations*, <http://www.energy.ca.gov/2017publications/CEC-400-2017-002/CEC-400-2017-002.pdf>. Accessed September 22, 2021.

<sup>82</sup> California Health and Safety Code, *Division 26. Air Resources, PART 3. Air Pollution Control Districts, Chapter 5.5. South Coast Air Quality Management District, ARTICLE 5. Plan, Section 40460(b)*, [https://leginfo.ca.gov/faces/codes\\_displaySection.xhtml?sectionNum=40460.&lawCode=HSC](https://leginfo.ca.gov/faces/codes_displaySection.xhtml?sectionNum=40460.&lawCode=HSC). Accessed September 22, 2021.

<sup>83</sup> Southern California Association of Governments (SCAG), *Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Draft, "Chapter 1,"* <https://www.connectsocial.org/Pages/Connect-SoCal-Draft-Plan.aspx>, Accessed September 22, 2021.

2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where SCAQMD is the Lead Agency.<sup>84</sup>

However, SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects). While it formed a GHG Significance Threshold Working Group to evaluate potential GHG significance thresholds, it failed to reach consensus; as a result, the SCAQMD has never adopted a formal threshold of significance.

SCAQMD adopted a “Policy on Global Warming and Stratospheric Ozone Depletion” on April 6, 1990.<sup>85</sup> The policy commits the SCAQMD to consider global impacts in rulemaking and in drafting revisions to the Air Quality Management Plan (AQMP). In March 1992, the SCAQMD Governing Board reaffirmed this policy and adopted amendments to the policy to include the following directives:

- Phase out the use and corresponding emissions of chlorofluorocarbons, methyl chloroform (1,1,1-trichloroethane or TCA), carbon tetrachloride, and halons by December 1995;
- Phase out the large quantity use and corresponding emissions of hydrochlorofluorocarbons by the year 2000;
- Develop recycling regulations for hydrochlorofluorocarbons (e.g., SCAQMD Rules 1411 and 1415);
- Develop an emissions inventory and control strategy for methyl bromide; and
- Support the adoption of a California GHG emission reduction goal.

#### **California Air Pollution Control Officers Association (CAPCOA) Guidance**

CAPCOA published a white paper to provide a common platform of information and tools to address climate change in CEQA analyses, including the evaluation of mitigation of GHG emissions from proposed Projects and identifying significance thresholds options. The white paper addresses issues inherent in establishing CEQA thresholds, evaluates tools, catalogues mitigation measures, and provides air districts and lead agencies with options for incorporating climate change into their programs.<sup>86</sup>

#### **4.7.4.4 Local**

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<sup>84</sup> SCAQMD, *Greenhouse Gases: CEQA Significance Thresholds*, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds>. Accessed September 22, 2021.

<sup>85</sup> SCAQMD, *SCAQMD's Historical Activity on Climate Change*, <http://www.aqmd.gov/nav/about/initiatives/climate-change>. Accessed September 22, 2021.

<sup>86</sup> California Air Pollution Control Officers Association, *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*, January 2008, Available: <http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA-White-Paper.pdf>. Accessed September 22, 2021.

#### **General Plan**

The Inglewood General Plan includes the following elements: Land Use, Circulation, Safety, Noise, Housing, Open Space, Conservation, and Environmental Justice.

#### **Land Use Element**

The following goal from the Land Use Element<sup>87</sup> of the City General Plan are relevant to air pollutant emissions.

**Circulation Goal:** Promote and support adequate public transportation within the City and the region.

**Circulation Goal:** Develop a safe and adequate pedestrian circulation system which is barrier free for the handicapped.

#### **Conservation Element**

The City's General Plan Conservation Element addresses the conservation, development, and use of natural resources.<sup>88</sup> Five specific areas of conservation and/or protection that are identified in the Conservation Element include (1) oil and gas production, (2) water production and provision for domestic use, (3) storm water runoff and wastewater, (4) hazardous waste and solid waste disposal, and (5) air pollution. The Conservation Element notes the following pollution-reducing measures:

- Reducing volatile emissions from factories and refineries;
- Reducing airborne particulate matter from factories and construction sites;
- Reducing numbers of vehicles being driven while increasing the utilization of high occupancy vehicles and alternative transportation;
- Requiring improvements to engine efficiency to decrease emissions; and
- Increasing the use of clean fuel vehicles.

#### **Inglewood Energy and Climate Action Plan**

The City adopted an Energy and Climate Action Plan<sup>89</sup> (ECAP) in 2013 to guide Citywide GHG emissions reduction efforts. The ECAP established four primary compliance paths which projects may choose to adhere to, including: ministerial and exempt project status, implementation of a combination of sustainable development standards, performance-based compliance, or payment of an in-lieu fee. These

<sup>87</sup> City of Inglewood, Department of Community Development and Housing, 1980. Land Use Element of the Inglewood General Plan. January 1980. Amended September 14, 2016.

<sup>88</sup> City of Inglewood General Plan, “Conservation Element” (1997), General Plan. January 1980.

<sup>89</sup> City of Inglewood, *Inglewood Energy and Climate Action Plan*, March 2013, <https://www.cityofinglewood.org/DocumentCenter/View/148/Inglewood-Energy-and-Climate-Action-Plan-ECAP-Adopted-2013-PDF>.

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measures were developed on a points-based system, which were chosen because they have been demonstrated by various studies to directly reduce GHG emissions or support changes in activities that lead to GHG emissions reductions. Each Climate-Ready Development Standard has a point value associated with it that reflects its general effectiveness at reducing GHG emissions. The standards apply to various types of projects, and a qualifier is included denoting which types of projects may implement the standard. Applicants have discretion regarding which measures that they would want their project to comply with; however, for a project to be fully compliant with the goals of the ECAP it must incorporate features meeting the standards sufficient to accrue a total of 20 points.

The ECAP quantifies GHG reductions from the following five implementing strategies and actions:

- Strategy 1: Lead by Example with Municipal Government Actions
  - Continue Building and Facility Energy Upgrades to reduce energy use
  - Replace all City-owned street, park, and traffic lights with light-emitting diode (LED) lights
  - Accelerate city vehicle fleet replacement
  - Continue commute trip reduction program
  - Planning for electric vehicle infrastructure
- Strategy 2: Increase Energy Efficiency
  - Make commercial buildings more efficient
  - Increase the energy efficiency of residential buildings
  - Increase the energy efficiency of street and traffic lights
- Strategy 3: Support Renewable Energy Generation
  - Remove barriers to renewable energy generation
  - Make renewable energy generation more affordable
  - Educate potential customers
- Strategy 4: Improve Transportation Options and Manage Transportation Demand
  - Make roadways more efficient
  - Improve transit
  - Improve bicycle facilities
  - Make parking more efficient
  - Reduce commute trips
  - Encourage land use intensification and diversity
- Strategy 5: Reduce Consumption and Waste
  - Use less water
  - Produce less waste
  - Promote local food production

#### 4.7 Greenhouse Gas Emissions

##### **City Green Building Code**

In December 2019, the Inglewood City Council approved Ordinance No. 20-05, which amended Chapter 11-2 of the Municipal Code.<sup>90</sup> As such, the City's Green Building Code adopted by reference the 2019 CALGreen<sup>91</sup> and associated standards.

##### **Envision Inglewood**

The City, through Envision Inglewood,<sup>92</sup> is developing a comprehensive transportation infrastructure plan and multimodal improvement program to connect the City's activity centers directly to the regional Metro Rail and Bus System, implement state-of-the-art transportation technologies and traffic demand management strategies to improve both daily and event commutes, and overall traffic management, reduce vehicular trips and enhance pedestrian, bike, and other transit amenities designed to improve air quality, and reduce overall greenhouse gas emissions, and support the economic revitalization already underway while simultaneously developing neighborhood protection programs.

As noted in the City's plan,<sup>93</sup> Inglewood is committed to providing world class transportation connections to its new State-of-the-art sports and entertainment centers and is working diligently to define and propose a last-mile fixed guideway transit connector. Mobility and direct transit access to the City's new activity centers are critical top priorities, especially given local and regional goals to increase transportation choices, reduce greenhouse gas emissions, improve air quality and human health, and encourage sustainable development patterns.

##### **Transit and Intercity Rail Capital Program**

The City applied for and received a Transit and Intercity Rail Capital Improvement Program (TIRCP) grant<sup>94</sup> from the California State Transportation Agency (CALSTA). The application required that the City demonstrate the effectiveness to reduce GHG emissions using the TIRCP Benefits Calculator.<sup>95</sup> The CARB developed the TIRCP Benefits Calculator Tool to estimate the GHG emissions and selected co-benefits of eligible grant applications. The Benefits Calculator Tool estimates GHG emissions using methods described in CARB's Co-Benefit Assessment Methodologies and utilizes motor vehicle emission factors (in grams per mile) to estimate GHG emissions (reported as carbon dioxide or CO<sub>2</sub> in metric tons). The emission factors

<sup>90</sup> City of Inglewood, Municipal Code, Article 2, Section 11-2 California Building Code. Established. Ordinance No. 20-05 approved December 2019.

<sup>91</sup> California Code of Regulations (CCR), Title 24, Part 11 - CALGreen, 2019 California Green Building Standards Code, Effective January 1, 2020.

<sup>92</sup> City of Inglewood, Envision Inglewood. <http://envisioninglewood.org/>. Accessed September 22, 2021.

<sup>93</sup> City of Inglewood, Envision Inglewood. <http://envisioninglewood.org/>. Accessed September 22, 2021.

<sup>94</sup> City of Inglewood, Transit, and Intercity Rail Program (TIRCP) Application for the City of Inglewood Transit Connector Project, January 16, 2020.

<sup>95</sup> CALSTA, 2020 Transit and Intercity Rail Capital Program Formal Draft Guidelines, TIRCP Quantification Methodology and Calculator Tool, <https://calsta.ca.gov/subject-areas/transit-intercity-rail-capital-prog>. Accessed September 22, 2021.

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are based on the CARB’s EMFAC2017<sup>96</sup> emissions inventory model. Emission factors are based on information associated with the Los Angeles County and the City within the South Coast Air Basin.

The goal of the TIRCP is to provide monies to fund transformative capital improvements that modernize California’s intercity rail, bus, ferry, and rail transit systems to achieve the following objectives:

- Reduction in greenhouse gas emissions;
- Expand and improve rail service to increase ridership;
- Integrate the rail service of the State’s various rail operations, including integration with the high-speed rail system; and
- Improve safety.

4.7.5 EXISTING CONDITIONS

4.7.5.1 Existing Greenhouse Gas Emissions

In 2019, the United States emitted about 6,558 million metric tons of CO<sub>2</sub>. Emissions decreased from 2018 to 2019 by 1.7 percent (after accounting for sequestration from the land sector). This decrease was driven largely by a decrease in emissions from fossil fuel combustion resulting from a decrease in total energy use in 2019 compared to 2018 and a continued shift from coal to natural gas and renewables in the electric power sector. Additionally, 2019 emissions were 13 percent below 2005 levels.<sup>97</sup>

State Emissions

California is the second largest contributor of GHGs in the United States and the 16th largest in the world.<sup>98</sup> In 2019, California produced 418.2 million metric tons of carbon dioxide equivalents (MMTCo<sub>2</sub>e), including imported electricity, and excluding combustion of international fuels and carbon sinks or storage. The major source of GHGs in California is transportation, contributing to 40 percent of the State’s total GHG emissions. The Statewide inventory of GHGs by sector is shown in **Table 4.7-2: California GHG Inventory 2011-2019**.

96 California Air Resources Board, EMFAC2017 User’s Guide, March 1, 2018, <https://www.arb.ca.gov/msei/downloads/emfac2017-volume-i-users-guide.pdf>. Accessed September 22, 2021.  
 97 United States Environmental Protection Agency, *Inventory of U.S. Greenhouse Gas Emissions and Sinks*, <https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks>. Accessed September 22, 2021.  
 98 California Energy Commission, *Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004, Staff Final Report*, CEC-600-2006-013-SF (December 2006).

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Table 4.7-2  
California GHG Inventory 2011–2019

Main Sector	Emissions (MMTCo <sub>2</sub> e)								
	2011	2012	2013	2014	2015	2016	2017	2018	2019
Transportation <sup>a</sup>	161.8	161.4	161.3	162.6	166.2	169.8	171.2	169.6	166.1
Electric Power	89.2	98.2	91.4	88.9	84.8	68.6	62.1	63.1	58.8
Industrial <sup>b</sup>	89.4	88.9	91.7	92.5	90.3	89.0	88.8	89.2	88.2
Commercial and Residential	46.0	43.5	44.2	38.2	38.8	40.6	41.3	41.4	43.8
Agriculture	34.4	35.5	33.8	34.7	33.5	33.3	32.5	32.7	31.8
High GWP <sup>c,d</sup>	14.5	15.5	16.8	17.7	18.6	19.2	20.0	20.4	20.6
Recycled and waste	8.4	8.3	8.4	8.4	8.5	8.6	8.7	8.7	8.9
<b>Total Emissions</b>	<b>443.7</b>	<b>451.3</b>	<b>447.6</b>	<b>443.0</b>	<b>440.7</b>	<b>429.1</b>	<b>424.6</b>	<b>425.1</b>	<b>418.2</b>

Source: CARB, *GHG Current California Emission Inventory Data*, <https://www2.arb.ca.gov/ghg-inventory-data>. Accessed September 22, 2021.  
<sup>a</sup> Includes equipment used in construction, mining, oil drilling, industrial and airport ground operations.  
<sup>b</sup> Reflects emissions from combustion of natural gas, diesel, and lease fuel plus fugitive emissions.  
<sup>c</sup> These categories are listed in the Industrial sector of CARB’s GHG Emission Inventory sectors.  
<sup>d</sup> This category is listed in the Electric Power sector of CARB’s GHG Emission Inventory sectors.  
 Note: MMTCo<sub>2</sub>e - million metric tons of carbon dioxide equivalent emissions

Local Emissions

City Greenhouse Gas Emissions Inventory

The South Bay Cities Council of Governments (SBCCOG) received funding from SCE’s 2013-2014 Local Government Partnership Strategic Plan Pilots Program<sup>99</sup> to assist local governments within the South Bay sub-region to prepare inventories of local GHG emissions and develop GHG reduction programs and policies. As a member of the SBCCOG, the City collaborated with the SBCCOG to develop inventories of community-wide GHG emissions for the years 2005 and 2007.<sup>100</sup> Additionally, the City developed a community-wide inventory for 2010 as reported in the 2013 Inglewood ECAP.<sup>101</sup>

The ECAP includes a business-as-usual (BAU) forecast that estimates future emissions in 2020 and 2035 from six sectors: Transportation, Residential Energy, Commercial/Municipal Energy, Industrial Energy, Solid Waste, and Water. The BAU forecast assumes GHG emissions that would occur in the future under regulatory conditions as they existed in 2010; the BAU forecast does not include the effects of updates to

99 Southern California Edison’s (SCE) 2013-2014 Local Government Partnership Strategic Plan Pilots Program <https://www.sce.com/partners/partnerships>. Accessed September 22, 2021.  
 100 South Bay Cities Council of Governments, 2011. *City of Inglewood Community Greenhouse Gas Emissions Inventory Report*. [http://www.southbaycities.org/sites/default/files/documents/inventories/Inglewood\\_Community\\_Inventory.pdf](http://www.southbaycities.org/sites/default/files/documents/inventories/Inglewood_Community_Inventory.pdf). Accessed September 23, 2021.  
 101 City of Inglewood, 2013, *Inglewood Energy and Climate Action Plan*. Available: <https://www.cityofinglewood.org/225/Sustainability>. Accessed September 23, 2021.

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Title 24,<sup>102</sup> the Renewables Portfolio Standard,<sup>103</sup> and the Pavley Clean Car Standards<sup>104</sup> on future GHG emissions.

The City's GHG inventories and forecasts are summarized in **Table 4.7-3: City of Inglewood Community GHG Emissions by Sector**. Under the ECAP's BAU forecast,<sup>105</sup> Inglewood's total GHG emissions are expected to increase approximately 14 percent from 2010 (594,273 MTCO<sub>2</sub>e) to 2035 (678,283 MTCO<sub>2</sub>e). On a per-service population (SP) basis, the increase is shown to be just 4.5 percent, from 4.22 MTCO<sub>2</sub>e/SP in 2010 to 4.41 MTCO<sub>2</sub>e/SP in 2035.

**Table 4.7-3  
City of Inglewood Community GHG Emissions by Sector  
(MTCO<sub>2</sub>e)**

Sector	2005	2007	2010	2020	2035
Transportation	320,245	311,853	322,042	327,998	337,552
Residential Energy	124,872	123,062	122,429	134,843	156,574
Commercial/Municipal Energy	97,176	99,458	95,261	106,041	124,749
Industrial Energy	34,940	31,272	26,100	26,376	26,830
Solid Waste	19,855	16,841	16,448	16,782	17,555
Water	13,813	13,272	11,993	14,707	15,044
<b>Total</b>	<b>610,910</b>	<b>595,758</b>	<b>594,273</b>	<b>626,748</b>	<b>678,284</b>
<b>Target/Goal</b> (change from 2005)				<b>519,273</b> (-15%)	<b>412,364</b> (-32.5%)
Reductions from State-level actions				-121,139	-160,002
Forecasts with implementation of State-level actions				<b>505,609</b>	<b>518,282</b>
Reductions from Local Actions				-9,803	-10,994
Forecasts with ECAP Implementation				495,806	499,208
Resulting Change from 2005				-18.8%	-18.3%
<b>Meet target/goal?</b>				<b>Yes</b>	<b>No</b>

Source: City, 2013. Inglewood Energy and Climate Action Plan.  
Note: MTCO<sub>2</sub>e = metric tons of carbon dioxide equivalent emissions

ECAP establishes an emissions reduction target of 15 percent below 2005 levels by 2020 and an emissions reduction goal of 32.5 percent below 2005 levels by 2035. As shown, State-level actions, such as the Pavley

102 California Buildings Standards Commission, *California Green Building Standards Code (Cal. Code Regs., Title 24, Part 11)*, <http://www.bsc.ca.gov/Home/CALGreen.aspx>. Accessed September 23, 2021.  
103 California Energy Commission, *Enforcement Procedures for the Renewables Portfolio Standards for Local Publicly Owned Electric Utilities: Amended Regulations*, <https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/rps-enforcement-regulations-publicly>. Accessed September 23, 2021.  
104 California's Greenhouse Gas Vehicle Emission Standards under Assembly Bill 1493 of 2002 (Pavley).  
105 City of Inglewood, 2013, *Inglewood Energy and Climate Action Plan*. Available: <https://www.cityofinglewood.org/225/Sustainability>. Accessed September 23, 2021.

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Clean Cars legislation,<sup>106</sup> the Low Carbon Fuel Standard,<sup>107</sup> the Renewables Portfolio Standard,<sup>108</sup> and Title 24<sup>109</sup> upgrades are expected to reduce community emissions by 121,139 MTCO<sub>2</sub>e per year by 2020, and 160,002 MTCO<sub>2</sub>e by year 2035.

Local measures in the CAP are expected to reduce community emissions an additional 9,803 MTCO<sub>2</sub>e per year by 2020, and 10,994 MTCO<sub>2</sub>e per year-by-year 2035.

The City's Community-wide emissions were categorized in six sectors:

- **Transportation** includes emissions from vehicles traveling (wholly or partially) within the City, and emissions from operating off-road vehicles and equipment (e.g., lawn and garden equipment, construction equipment, industrial equipment, and light commercial equipment).
- **Residential Energy** includes emissions from electricity and natural gas consumption in residential buildings.
- **Commercial/Municipal Energy** includes emissions from electricity and the on-site combustion of natural gas and fuel use in nonresidential buildings and city facilities (including outdoor lighting).
- **Industrial Energy** includes emissions from electricity and the on-site combustion of natural gas and fuel use in industrial buildings and facilities.
- **Solid Waste** includes emissions from solid waste that is generated in the community and sent to landfills.
- **Water** includes emissions from the electricity used to source, treat, and deliver imported water in the community that is not accounted for in the community utility data.

As shown, the transportation sector was the largest contributor to the most recent inventory (2010) at over 54 percent of the total. Residential Energy consumption is the second-largest contributor to emissions at 20.6 percent of the total, followed by Commercial/Municipal Energy (16 percent), Industrial Energy (4.4 percent), Solid Waste (2.8 percent), and Water (2 percent).

**Existing Uses**

The proposed Project would require a number of full and partial property acquisitions and easements or leases for construction and operation of the he proposed Project. Existing operations at the current uses

106 California's Greenhouse Gas Vehicle Emission Standards under Assembly Bill 1493 of 2002 (Pavley).  
107 Office of the Governor, *Executive Order S-01-07, (January 18, 2007)*, <https://climateactionnetwork.ca/wp-content/uploads/2011/06/eos0107.pdf>. Accessed September 23, 2021.  
108 California Energy Commission, *Enforcement Procedures for the Renewables Portfolio Standards for Local Publicly Owned Electric Utilities: Amended Regulations*, <https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/rps-enforcement-regulations-publicly>. Accessed September 23, 2021.  
109 California Buildings Standards Commission, *California Green Building Standards Code (Cal. Code Regs., Title 24, Part 11)*, <http://www.bsc.ca.gov/Home/CALGreen.aspx>. Accessed September 23, 2021.

that will be removed as part of the proposed Project generate GHG emissions from energy (electricity and natural gas), on-road motor vehicles (mobile), solid waste, water and wastewater, and area sources.

**Table 4.7-4: Existing Uses Greenhouse Gas Emissions** identifies the existing emissions from the existing uses within the area of the proposed Project that will be converted. As shown, the existing uses currently generate 67,372 MTCO<sub>2</sub>e per year.

**Table 4.7-4  
Existing Uses Greenhouse Gas Emissions (Metric Tons per Year)**

Source	MTCO <sub>2</sub> e
Area (Consumer Products, Landscaping)	<1
Energy (Natural Gas)	371
Energy (Electrical)	1,882
Solid Waste	563
Water and Wastewater	241
Motor Vehicles	64,316
<b>Total</b>	<b>67,372</b>

Source: RCH Group, 2021, **Appendix G.1.**

Notes:

MTCO<sub>2</sub>e = metric tons of carbon dioxide equivalent emissions

Area sources, water, waste, and energy (Natural Gas and electrical) values based on CalEEMod calculations. Motor vehicle values based EMFAC calculations.

#### 4.7.5.2 Adjusted Baseline

The Air Quality and Transportation analyses, including the analysis of VMT, assume the Adjusted Baseline Environmental Setting as described in **Section 4.0: Environmental Analysis**; see **Table 4.0-1** for the details of the Adjusted Baseline. Analysis of GHG emissions is cumulative in nature because global climate change effects are caused by cumulative global emissions. Although the Hollywood Park Specific Plan (HPSP) project will be constructed and in operation prior to opening of the proposed Project, its potential impact on global emissions would not affect the impact analysis regarding GHG emissions from the proposed Project. No other changes to the existing environmental setting related to GHG emissions would occur under the Adjusted Baseline.

#### 4.7.6 THRESHOLDS OF SIGNIFICANCE

Criteria outlined in CEQA Guidelines were used to determine the level of significance of greenhouse gas emissions impacts. The Project would have a significant impact in relation to greenhouse gas emissions if it were to:

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

**Threshold GHG-2** Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Pursuant to CEQA Guidelines Section 15064.4,<sup>110</sup> the methods suitable for analysis of GHG emissions are:

1. Use a model or methodology to quantify greenhouse gas emissions resulting from a project. The Lead Agency has discretion to select the model it considers most appropriate provided it supports its decision with substantial evidence. The Lead Agency should explain the limitation of the particular model or methodology selected for use.
2. Rely on a qualitative analysis or performance-based standards.

Assessing the significance of a project’s contribution to cumulative global climate change involves: (1) developing pertinent inventories of GHG emissions, and (2) considering project consistency with applicable emission reduction strategies and goals, such as those set forth in the ECAP.

For the purposes of this impact discussion, the proposed Project would generate GHG emissions that may have a significant impact on the environment if the proposed Project’s GHG emissions would exceed a net-zero threshold.

#### 4.7.7 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

**Impact GHG-1:** Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

The proposed Project is a new electrically powered ATS system that will expand the regional Metro Rail system’s transit access by providing three new stations with direct connectivity to one of the highest growing housing and employment centers in LA County, new regionally serving sports and entertainment venues in the City, new plan areas with adopted land use policies/zoning promoting greater housing density and transit-oriented developments, and new planned bicycle/pedestrian infrastructure connections.

The following analysis of the impact on climate change focuses on the proposed Project’s contribution to cumulatively significant GHG emissions.

<sup>110</sup> California Code of Regulations Title 14, Section 15064.4. Determining the Significance of Impacts from Greenhouse Gas Emissions.

### Construction

Prior to construction of the proposed Project, reconstruction of the existing Vons store to be removed is proposed on the corner of Manchester Boulevard and Hillcrest Boulevard. This proposed replacement Vons store would include amenities similar to the existing store, including a pharmacy and bank branch.

**Table 4.7-5: Vons Replacement Construction Greenhouse Gas Emissions** below shows the construction emissions that would occur during development of the Vons store prior to construction of the proposed Project. As shown in **Table 4.7-5**, the total estimated construction GHG emissions for the replacement Vons store is 257 metric tons of CO<sub>2</sub>e. Amortized over 30 years, construction related GHG emissions would be approximately 9 metric tons of CO<sub>2</sub>e per year.

Source	MTCO <sub>2</sub> e
Total Construction Emissions	257
<b>Total 30-Year Amortized Construction Emissions per Year</b>	<b>9</b>

Source: **Appendix G.2**  
MTCO<sub>2</sub>e = metric tons of carbon dioxide equivalent emissions

The modeling for the proposed Project construction includes **PDF AQ-1** from the Construction Commitment Program (CCP). **PDF AQ-1** would require the use equipment that meets the USEPA's Final Tier 4 emissions standards for off-road diesel-powered construction equipment with 50 hp or greater, for all phases of construction activity. Additionally, **PDF AQ-1** would require smaller pieces of equipment to be electric or alternative-fueled (i.e., non-diesel) to the maximum extent feasible and would require construction vendors, contractors, and/or haul truck operators commit to using 2010 model year trucks. Finally, **PDF AQ-1** would require the use of electric or alternatively fueled (e.g., natural gas) sweepers with HEPA filters.

Construction of the proposed Project would result in GHG emissions of CO<sub>2</sub> and smaller amounts of CH<sub>4</sub> and N<sub>2</sub>O from construction equipment and mobile sources such as haul trucks and worker vehicles (see **Section 4.2: Air Quality** for construction emissions). Construction emissions were calculated for each year of construction activity using CalEEMod and applying emission factors from EMFAC2017 to calculate mobile source emissions. Construction emissions were forecasted based on an expectation that construction of the proposed Project would occur in several overlapping phases over an approximately four-year period, from 2024 through 2027. This is a conservative approach that assumes all construction occurs at the earliest feasible date.

GHG emissions from construction were amortized over the 30-year lifetime of the proposed Project.

The total estimated construction GHG emissions for the proposed Project are 8,820 metric tons of CO<sub>2</sub>e.<sup>111</sup> Given the four-year construction period, the annual construction GHG emissions for the proposed Project are 2,205 metric tons of CO<sub>2</sub>e. Amortized over 30 years, construction related GHG emissions would be approximately 294 metric tons of CO<sub>2</sub>e per year. The results are presented in **Table 4.7-6: Estimated Construction Greenhouse Gas Emissions for the Proposed Project**.

**Table 4.7-6  
Estimated Construction Greenhouse Gas Emissions for the Proposed Project (Metric Tons per Year)**

Construction Year	MTCO <sub>2</sub> e
2024	2,799
2025	3,044
2026	2,481
2027	496
<b>Total Construction Emissions</b>	<b>8,820</b>
<b>Total 30-Year Amortized Construction Emissions per Year</b>	<b>294</b>

Source: RCH Group, 2021, **Appendix G.1**  
MTCO<sub>2</sub>e = metric tons of carbon dioxide equivalent emissions

### Operation

As discussed previously, reconstruction of the existing Vons store to be removed is proposed on the corner of Manchester Boulevard and Hillcrest Boulevard. **Table 4.7-7: Vons Replacement Operational Greenhouse Gas Emissions** below shows the operational emissions that would be generated prior to construction of the proposed Project.

**Table 4.7-7  
Vons Replacement Operational Greenhouse Gas Emissions**

Source	MTCO <sub>2</sub> e
Replacement Vons Operation	797
Construction (30-Year Annual Amortized Rate)	9
<b>Total Emissions</b>	<b>806</b>

Source: **Appendix G.2**  
MTCO<sub>2</sub>e = metric tons of carbon dioxide equivalent emissions

<sup>111</sup> Fuel usage is estimated using the output for CO<sub>2</sub> and a 10.15 kg-CO<sub>2</sub>/gallon conversion factor, as cited in the U.S. Energy Information Administration Voluntary Reporting of Greenhouse Gases Program, [https://www.eia.gov/environment/pdfpages/0608s\(2009\)index.php](https://www.eia.gov/environment/pdfpages/0608s(2009)index.php). Accessed September 23, 2021.

As shown in **Table 4.7-7**, the total estimated construction GHG emissions for the replacement Vons store is 806 metric tons of CO<sub>2</sub>e.

The operational life of the proposed Project is assumed to be 30 years. Operational emissions were estimated for the anticipated start of operations in late 2027 and a milestone year of 2045.<sup>112</sup> It is assumed that due to advances in technology and regulations to reduce GHG emissions, that operational emissions would continue to decline by 2045, and thereafter. CalEEMod and EMFAC 2017 were used to estimate GHG emissions from area, energy, solid waste, water and wastewater, and mobile sources.

The normal operation of the proposed Project would generate GHG emissions from the operation of the MSF, stations, and other facilities. **Table 4.7-8: Estimated Annual GHG Emissions for Proposed Project Components** presents the annual GHG emissions to operate these facilities. As shown, emissions from normal operations would be 3,378 MTCO<sub>2</sub>e per year.

**Table 4.7-8  
Estimated Annual GHG Emissions for Proposed Project Components**

Source	Annual GHG MTCO <sub>2</sub> e
Employee Trips	515
Deliveries	86
Area (Consumer Products, Landscaping)	<1
Energy (Natural Gas)	126
Energy (Electrical) <sup>a</sup>	2,472
Solid Waste	49
Water and Wastewater	130
<b>Total Project (Typical Operations)</b>	<b>3,378</b>
Backup Generators	311
<b>Total Project (Typical Operations + Backup Generators)</b>	<b>3,689</b>

Source: RCH Group, 2021, Appendix G1.  
MTCO<sub>2</sub>e = metric tons of carbon dioxide equivalent emissions  
<sup>a</sup> Based on CalEEMod for MSF plus ATS usage of 9,192,000kWh along with an SCE emission factor of 535 pounds per MWh.

As discussed previously, each PDS substation will be equipped with backup power generators. The proposed Project would include up to two stationary standby generators, one at each of the PDS substations, with an estimated total capacity rated at approximately 4,000 kilowatts (kW) to provide emergency power primarily for ATS train operation, lighting, and other emergency systems. As shown in **Table 4.7-8**, GHG emissions for the backup generators are estimated to be 311 MTCO<sub>2</sub>e per year, bringing total operations to 3,689 MTCO<sub>2</sub>e per year. The backup generators would only run for emergency

112 For purposes of analysis, modeling emissions begin the first full year after completion of construction. For the proposed Project, this would be year 2028.

conditions when the main electrical power is not available, and for regular testing. The emissions would be limited to only those periods and would not be an ongoing operational activity.

**Vehicle GHG Emissions**

The proposed Project has been designed to reduce VMT for local and regional travel by shifting demand from the general public from autos to public transit. As discussed, **Section 3.0: Project Description** this includes connection to regional rail and light rail transit and other means. Mobility, connectivity, and VMT reduction benefits of the proposed Project include:

- The proposed Project would provide direct connections for passengers throughout the region to the City’s housing and employment centers, and new sports and entertainment venues;
- The proposed Project would help manage and support the City’s projected growth by providing transit within a safe and accessible walking distance to thousands of new residents, housing units and jobs, including the new residents, housing units, and jobs at the Los Angeles Stadium and Entertainment District (LASED) property in Hollywood Park;
- The proposed Project will provide a direct connection to the regional Metro Rail system and would close the “last mile” gap of approximately 1.5 to 2 miles from Metro’s Downtown Inglewood station to the City’s major activity centers; and
- The proposed Project would be located within close proximity to bus lines serving the area and would provide new opportunities to increase bus service ridership.

See **Section 4.12** for further discussion of transit opportunities within the proposed Project vicinity.

Mobile GHG emissions from fleetwide shifts from auto use to public transit were calculated based on EMFAC2017 data and Project-specific VMT data which is presented in **Section 4.12** and is provided in **Appendix O**.

**Table 4.7-9: Daily and Annual VMT for the Six Operational Scenarios** presents the daily and annual VMT for the Adjusted Baseline and the operational scenarios for 2027 and 2045 with and without the proposed Project. As shown, the proposed Project daily and annual VMT are less than the daily and annual VMT in each “Operational” scenario than without the proposed Project. For the Adjusted Baseline, the reduction for VMT with and without the proposed Project is 40,367 VMT daily and 12,872,060 VMT annually. For the 2027 opening year, the reduction in VMT with and without the proposed Project is 247,540 VMT daily and 36,227,624 VMT annually. For the 2045 future year, the reduction for VMT with and without the proposed Project is 316,881 VMT daily and 43,143,335 VMT annually.

**Table 4.7-9**  
Daily and Annual VMT for the Six Operational Scenarios

Scenario	Daily VMT	Annual VMT
Adjusted Baseline without proposed Project	3,132,256	998,811,151
Adjusted Baseline with proposed Project	3,091,889	985,939,091
Year 2027 with Event Weekday without proposed Project	5,275,088	1,346,432,106
Year 2027 with Event Weekday with proposed Project	5,027,548	1,310,204,482
Year 2045 with Event Weekday without proposed Project	5,662,297	1,469,905,139
Year 2045 with Event Weekday with proposed Project	5,345,416	1,426,761,804

Source: RCH Group, 2021, Appendix G1.

VMT – vehicle miles traveled

Note: For purposes of analysis, modeling emissions begin the first full year after completion of construction. For the proposed Project, this would be year 2028.

**Table 4.7-10: Estimated Annual Operational GHG Emissions for Proposed Project for Motor Vehicles** presents the annual GHG emissions for the Adjusted Baseline and the operational scenarios for 2027 and 2045 with and without the proposed Project.

**Table 4.7-10**  
Estimated Annual Operational Emissions for Proposed Project for Motor Vehicles

Scenario	MTCO <sub>2</sub> e
Adjusted Baseline (2016)	426,968
Adjusted Baseline (2016) with proposed Project	421,466
Year 2027 with Event Weekday without proposed Project	420,542
Year 2027 with Event Weekday with proposed Project	409,227
Year 2045 with Event Weekday without proposed Project	390,262
Year 2045 with Event Weekday with proposed Project	378,807
<b>Incremental Change</b>	<b>MTCO<sub>2</sub>e</b>
Adjusted Baseline with proposed Project vs Adjusted Baseline	-5,503
Year 2027 with Event Weekday with proposed Project vs Year 2026 with Event Weekday without proposed Project	-11,315
Year 2045 with Event Weekday with proposed Project vs Year 2045 with Event Weekday without proposed Project	-11,455

Source: RCH Group, 2021, Appendix G1.

Numbers may not add up due to rounding

MTCO<sub>2</sub>e = metric tons of carbon dioxide equivalent emissions

Note: For purposes of analysis, modeling emissions begin the first full year of completion of construction. For the proposed Project, this would be year 2028.

As shown, annual MTCO<sub>2</sub>e would be reduced by 5,503 MTCO<sub>2</sub>e when compared to the Adjusted Baseline without proposed Project, 11,315 MTCO<sub>2</sub>e when compared to the 2027 opening year without proposed Project, and 11,455 MTCO<sub>2</sub>e when compared to the 2045 future year without proposed Project.

#### Combined Source Proposed Project GHG Emissions

**Table 4.7-11: Estimated Annual GHG Emission Reductions for Proposed Project** presents the GHG emissions under normal operations including the directly emissions from employee trips, deliveries, area

sources, energy sources (natural gas), while accounting for the reduction in motor vehicle as a result of the demolition of existing development.

**Table 4.7-11**  
Estimated Annual GHG Emissions for Proposed Project

Source	Annual GHG Emissions (MTCO <sub>2</sub> e)	
	2027	2045
Employee Trips	515	515
Deliveries	86	86
Area (Consumer Products, Landscaping)	<1	<1
Energy (Natural Gas)	126	126
Energy Source (Electrical)	2,472	2,472
Solid Waste	49	49
Water and Wastewater	130	130
Construction (30-Year Annual Amortized Rate)	294	294
<b>Subtotal Project (Typical Operations)</b>	<b>3,672</b>	<b>3,672</b>
Emergency Generators	311	311
<b>Subtotal Project (Typical Operations + O&amp;M)</b>	<b>3,983</b>	<b>3,983</b>
Motor Vehicle GHG Emissions <sup>a</sup>	-11,315	-11,455
<b>Subtotal (Project with Motor Vehicle Reductions)</b>	<b>-7,332</b>	<b>-7,472</b>
Existing Conditions GHG Emissions <sup>b</sup>	-67,372	-67,372
Vons Replacement Store <sup>c</sup>	806	806
<b>Grand Total (Project)</b>	<b>-73,898</b>	<b>-74,038</b>

Source: RCH Group, 2021, Appendix G1.

Notes:

a – See Table 4.7-10

b – see Table 4.7-3

c – see Table 4.7-7

MTCO<sub>2</sub>e = metric tons of carbon dioxide equivalent emissions

The GHG emissions account for the normal operations of the proposed Project and also provide consideration for use of the backup generators and construction emissions amortized over a 30-year period. The total annual GHG emissions of the normal operations of the proposed Project would be 3,672 MTCO<sub>2</sub>e.

When the reduction in 2027 vehicle emissions of -11,315 MTCO<sub>2</sub>e and the existing uses to be removed of -67,372 MTCO<sub>2</sub>e is considered, the result of the proposed Project is a net reduction of 73,898 MTCO<sub>2</sub>e annually. When the reduction in 2045 vehicle emissions of -11,455 MTCO<sub>2</sub>e and the existing uses to be removed of -67,372 MTCO<sub>2</sub>e is considered, the result of the proposed Project is a net reduction of 74,038 MTCO<sub>2</sub>e annually.

Finally, the City will publish annual performance reviews to demonstrate progress toward the benefits enabled by the TIRCP program, as defined by the CalSTA Call for Project Guidelines. The annual

performance review will include tracking metrics and will be conducted by the City. This will include annual reports for GHG reductions measured by MTCO<sub>2</sub>e and decrease in criteria pollutants.

As such, the proposed Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, and impacts would be less than significant.

### Mitigation Measures

#### Construction

Mitigation measures that have been identified for air quality **Impact AQ-1 (PDF AQ-1)** have been accounted for in the estimate of construction-related GHG emissions.

#### Operation

No mitigation is required.

#### Level of Significance after Mitigation

The proposed Project will generate a net GHG emission reduction of 73,898 MTCO<sub>2</sub>e annually by 2027, and 74,038 MTCO<sub>2</sub>e annually by 2045.<sup>113</sup> These net reductions in GHG emissions are consistent with the net-zero significance thresholds established in this analysis. As a result, operational GHG emissions would not be cumulatively considerable, and impacts would be considered beneficial.

**Impact GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

A significant impact would occur if the proposed Project would conflict with applicable regulations, plans and policies that were adopted to reduce GHG emissions that contribute to global climate change. For the proposed Project, this analysis considers the proposed Project's consistency with the following applicable plans, policies, and regulations to reduce GHG emissions:

- The 2017 Climate Change Scoping Plan Update, CARB's plan for achieving a 40 percent reduction on GHG emissions from 1990 levels by 2030, Statewide, as mandated by SB 32;
- SCAG's 2020-2045 RTP/SCS, the regional plan for achieving sustainable land use patterns that reduce passenger vehicle GHG emissions, as mandated by SB 375;
- The City General Plan; and
- The City's ECAP.

<sup>113</sup> CEQA Guideline, Section 15064.3(b), *Determining Significant Impacts of Transportation Projects*.

### CARB 2017 Scoping Plan Update

As directed by Executive Order B-30-15, CARB's 2017 Scoping Plan Update<sup>114</sup> describes how the State plans to achieve the 2030 GHG emission reduction goal for California of 40 percent below 1990 levels by 2030, as mandated by SB 32. The 2017 Scoping Plan Update strategy for meeting the 2030 GHG target incorporates the full range of legislative actions and State-developed plans that have relevance to the year 2030, including the LCFS, SB 350, the 2016 Mobile Source Strategy, the Sustainable Freight Action Plan, SB 1383, and the Cap-and-Trade Program (AB 398).

The proposed Project would be consistent with key State plans and regulatory requirements referenced in the 2017 Scoping Plan Update designed to reduce Statewide emissions. According to the 2017 Scoping Plan Update, reductions needed to achieve the 2030 target are expected to be achieved by increasing the RPS to 50 percent of the State's electricity by 2030, greatly increasing the fuel economy of vehicles and the number of zero-emission or hybrid vehicles, reducing the rate of growth in VMT, supporting high-speed rail and other alternative transportation options, and increasing the use of high-efficiency appliances, water heaters, and HVAC systems. The proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Metro K Line, and other transit providers as well as the City's major activity centers, such as the Forum, the LASED and HPSP including SoFi stadium, and IBEC. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce per-capita VMT. For these reasons, the proposed Project would not conflict with CARB's 2017 Scoping Plan Update.

### Executive Order S-3-05

Executive Order No. S3-05 established a long-term goal of reducing California's GHG emissions to 80 percent below the 1990 level by the year 2050. The proposed Project GHG emissions would result in a net decrease of over 60,000 MTCO<sub>2</sub>e of GHG annually starting in 2027.

Even though the State has not provided a clear regulatory and technological roadmap to achieve the 2050 goal, it has demonstrated the potential pace at which emission reductions can be achieved through new regulations, technology deployments, and market developments. In developing the 2017 Scoping Plan Update, CARB, CEC, CPUC, and the California Independent System Operator (CAISO) commissioned a study to evaluate the feasibility and cost of meeting the 2030 target along the way to reaching the State goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, the California State Agencies' PATHWAYS Project explores scenarios for meeting the State long-term GHG emissions targets, encompassing the entirety of California economy with detailed representations of the

<sup>114</sup> CARB, California's 2017 Climate Change Scoping Plan, [https://www.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf). Accessed September 23, 2021.

buildings, industry, transportation, and electricity sectors.<sup>115</sup> While acknowledging the inherent uncertainty associated with its modeling assumptions, the PATHWAYS study emphasizes the need for significant action and continued policy development by the State to support low-carbon technologies and markets for energy efficiency, building electrification, renewable electricity, zero emission vehicles, and renewable liquid fuels. The study underscores the need for a periodic review of State policies and programs for reducing GHG emissions, as was anticipated by AB 32 in its directive to update the Scoping Plan at least every 5 years.

Statewide efforts are underway to facilitate the achievement of the EO S-3-05 goals. As discussed herein, the proposed Project GHG would provide net benefits in GHG reductions. Given the net reduction GHG emissions that would result from the proposed Project, it would not conflict with the ability of the State to achieve the 2050 horizon-year goal of EO S-3-05.

#### SCAG 2020-2045 RTP/SCS

A detailed consistency analysis for proposed Project with the 2020-2045 RTP/SCS is provided in **Section 4.9: Land Use and Planning**. The 2020-2045 SCAG RTP/SCS<sup>116</sup> is the primary planning document for regional transportation infrastructure in the greater Los Angeles area. With a horizon year of 2045, this long-range plan, required by the federal government, is updated by SCAG every four years as demographic, economic, and policy circumstances change.

Although demographic growth in the six-county SCAG region is slowing, the overall regional population is expected to exceed 22.5 million by 2045 - an increase of nearly 4 million people from the 2016 baseline. According to SCAG, population, housing, and employment growth are expected to be particularly strong in the cities of Los Angeles, Culver City, unincorporated areas of Los Angeles County, portions of the South Bay Cities, and Inglewood. The SCAG region is projected to experience a household growth rate of approximately 24 percent, and an employment growth rate of 23 percent. Currently, the City contains roughly 8,900 housing units and 14,414 employees within a ½ mile of the proposed Project's three stations. By 2040, these areas are projected to increase to roughly 12,875 households, and 38,326 employees. These increases represent a growth rate of approximately 45 percent in households and 166 percent in employment. In comparison to the SCAG region, these projections translate into the City (within

<sup>115</sup> Energy + Environmental Economics (E3), 2015. Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios. Available: [https://www.ethree.com/public\\_proceedings/summary-california-state-agencies-pathways-project-long-term-greenhouse-gas-reduction-scenarios/](https://www.ethree.com/public_proceedings/summary-california-state-agencies-pathways-project-long-term-greenhouse-gas-reduction-scenarios/). Accessed September 23, 2021.

<sup>116</sup> Southern California Association of Governments (SCAG), *Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Draft*, "Chapter 1," <https://www.connectsocial.org/Pages/Connect-SoCal-Draft-Plan.aspx>. Accessed September 23, 2021.

a ½ mile of the proposed Project's three stations) experiencing almost twice as much growth rate in housing, and more than seven times as much growth rate in employment by 2040.<sup>117</sup>

As discussed in **Section 4.2** of this Recirculated Draft EIR, the SCAQMD AQMPs includes land use and transportation strategies from the SCAG 2020-2045 RTP/SCS<sup>118</sup> that are intended to reduce VMT and resulting regional mobile source emissions. The applicable land use strategies include planning for growth around livable corridors; providing more options for short trips/neighborhood mobility areas; supporting electric vehicles and expanding vehicle charging stations; supporting local sustainability planning.

The proposed Project spans the length of approximately 1.6 miles and would be located near existing restaurant, retail, and commercial land uses which generate vehicle trips on local roadways within the area of the proposed Project. The proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Metro K Line, and other transit providers as well as the City's major activity centers, such as the Forum, the LASED and HPSP including SoFi stadium, and IBEC. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce per-capita VMT. A reduction in VMTs would result in reduced GHG emissions from mobile sources.

The proposed Project would be consistent with a number of SCAG's goals including the following: 1) improving mobility, accessibility, reliability, and travel safety for people and goods; 2) increasing person and goods movement and travel choices within the transportation system; 3) reducing GHG emissions and improving air quality; and 4) encouraging development of diverse housing types in areas that are supported by multiple transportation options. In addition, the proposed Project is a prime example of one of SCAG's primary strategies which is to link future growth with more transportation choices, specifically around high-quality transit areas (i.e., the ½ mile surrounding rail transit stops or bus stops/corridors that have peak headways of 15 minutes or less), such as the proposed Project's stations.

As part of its vision, the 2020-2045 RTP/SCS includes Connect SoCal;<sup>119</sup> Connect SoCal charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve

<sup>117</sup> City of Inglewood, *Transit, and Intercity Rail Program (TIRCP) Application for the City of Inglewood Transit Connector Project*, January 16, 2020.

<sup>118</sup> Southern California Association of Governments (SCAG), *Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Draft*, "Chapter 1," <https://www.connectsocial.org/Pages/Connect-SoCal-Draft-Plan.aspx>. Accessed September 23, 2021.

<sup>119</sup> Southern California Association of Governments (SCAG), *Connect SoCal, The 2020-2045 Regional Transportation Plan/Sustainable Community Strategy of the Southern California Association of Governments*, <https://www.connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>. Accessed September 23, 2021.

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a more sustainable growth pattern. To augment the Core Vision of the plan, Connect SoCal includes new initiatives at the intersection of land use, transportation, and technology to close the gap and reach our greenhouse gas reduction goals. As part of the planning vision, Connect SoCal looks to complete “last mile” mobility as part of its sustainability goals. Connect SoCal builds upon with regional initiatives that link the built environment and transportation system with policies, projects and programs that strengthen and enhance each other beyond what each would accomplish in isolation.<sup>120</sup>

As part of the State’s mandate to reduce per-capita GHG emissions from automobiles and light trucks, Connect SoCal presents strategies and tools that are consistent with local jurisdictions’ land use policies and incorporate best practices for achieving the State-mandated reductions in GHG emissions at the regional level through reduced per-capita VMT. These strategies identify how the SCAG region can implement Connect SoCal and achieve related GHG reductions. SCAG works to support local jurisdictions and partnerships by identifying ways to implement SCS in a way that fits the vision and needs of each local community.

The following Connect SoCal strategies are intended to be supportive of implementing the regional Sustainable Communities Strategy and are applicable to the proposed Project:

##### **Focus Growth Near Destinations & Mobility Options**

- Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets.
- Encourage design and transportation options that reduce the reliance on and number of solo car trips.

##### **Support Implementation of Sustainability Policies**

- Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions.

The proposed Project’s is approximately 1.6 miles in length and would be located near existing residential, office, retail, and commercial land uses which generate vehicle trips on local roadways within the City. The proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Metro K Line, and other transit providers as well as the City’s major activity centers, such as The Forum, the LASED and HPSP. Implementation of the proposed Project would provide an alternate mode of transportation within the City and decrease vehicle ridership and thereby VMTs.

The 2020-2045 RTP/SCS states that expanding the transit network is central to the region’s plan for

<sup>120</sup> Southern California Association of Governments (SCAG), *Connect SoCal, The 2020-2045 Regional Transportation Plan/Sustainable Community Strategy of the Southern California Association of Governments*, p. 4 <https://www.connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>. Accessed September 23, 2021.

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meeting mobility and sustainability goals while continuing to grow the regional economy.<sup>121</sup> The proposed Project connects transit and achieves the last mile/first mile goals of the 2020-2045 RTP/SCS. Further, the proposed Project is consistent with and assists in achieving Connect SoCal strategies and incorporates best practices for achieving the State-mandated reductions in GHG emissions at the regional level through reduced per-capita VMT.

For these reasons, the proposed Project would not conflict with SCAG’s 2020-2045 RTP/SCS.

##### **City ECAP**

ECAP<sup>122</sup> implementation is expected to reduce emissions by 18.8 percent below 2005 levels by 2020, enabling the City to meet its 2005 target. However, the City would need to reduce emissions by an additional 111,702 MTCO<sub>2</sub>e per year by 2035 to meet its 2035 emissions reduction goal. The ECAP includes the following strategies and actions that are applicable to the proposed Project:

- Strategy 1: Lead by Example with Municipal Government Actions
  - Continue Building and Facility Energy Upgrades to reduce energy use
  - Replace all City-owned street, park, and traffic lights with light-emitting diode (LED) lights
  - Accelerate city vehicle fleet replacement
  - Continue commute trip reduction program
  - Planning for electric vehicle infrastructure
- Strategy 3: Support Renewable Energy Generation
  - Remove barriers to renewable energy generation
  - Make renewable energy generation more affordable
  - Educate potential customers
- Strategy 4: Improve Transportation Options and Manage Transportation Demand
  - Make roadways more efficient
  - Improve transit
  - Improve bicycle facilities
  - Make parking more efficient
  - Reduce commute trips
  - Encourage land use intensification and diversity

<sup>121</sup> Southern California Association of Governments (SCAG), *Connect SoCal, The 2020-2045 Regional Transportation Plan/Sustainable Community Strategy of the Southern California Association of Governments*, Chapter 3. <https://www.connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>, Accessed September 23, 2021.

<sup>122</sup> City of Inglewood, *Inglewood Energy and Climate Action Plan*, March 2013, <https://www.cityofinglewood.org/DocumentCenter/View/148/Inglewood-Energy-and-Climate-Action-Plan-ECAP-Adopted-2013-PDF>. Accessed September 23, 2021.

#### 4.7 Greenhouse Gas Emissions

As discussed previously, the proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Metro K Line, and other transit providers as well as the City's major activity centers, such as the Forum, the LASED and HPSP including SoFi stadium and IBEC. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce per-capita VMT. The proposed Project would be consistent with the City's ECAP.

The proposed Project's connection from the City's new housing and employment centers, and sports and entertainment venues, to the Metro K Line and larger regional and State rail system will result in significant benefits for both the City and southern California region, including significant reductions in VMT and GHG emissions.

As a transit connector project, the proposed Project will generate a significant amount of ridership from throughout the region with nearly half of the trips originating from Metro's regional light-rail transit system including the Metro K Line and its connection to South Los Angeles, the Metro Green Line and its connections to the South Bay region and Norwalk, the Expo Line and its connections to Santa Monica, Union Station (connection to California High-Speed Rail), East Los Angeles, Pasadena, and the San Gabriel and San Fernando Valleys. The proposed Project will attract passengers throughout the region by providing a direct transit connection to the City's housing and employment centers, and new sports and entertainment venues.

In addition to rail integration, the proposed Project provides opportunities to increase bus service ridership. Rail and bus integration are symbiotic – bus service is enhanced by urban transit and vice versa. The proposed Project will be located within close proximity to twenty-two municipal bus lines serving the area, including eighteen bus lines operated by Metro, one line operated by Santa Monica Big Blue, one operated by Culver City Bus, one operated by Los Angeles County, and other operated by the Los Angeles Department of Transportation (LADOT).

The ECAP also reflects a commitment to increasing energy efficiency and implementing energy conservation measures to reduce wasteful, inefficient, and unnecessary consumption. The proposed Project would incorporate a number of sustainability features as listed in **Appendix C: ITC Design Standards and Guidelines**. The City has committed to implementing, if feasible, various sustainability measures for different proposed Project elements that meet or exceed CALGreen requirements, including energy and water conservation measures.

As a result, the benefits of completing the proposed Project will generate significant GHG emission reductions. Without the proposed Project, these VMT reductions and air quality improvements would not be realized.

#### 4.7 Greenhouse Gas Emissions

##### City General Plan

The City General Plan<sup>123</sup> includes the following elements: Land Use, Circulation, Safety, Noise, Housing, Open Space, and Conservation.

##### Land Use Element

The following goal from the Land Use Element<sup>124</sup> of the City General Plan are relevant to GHG emissions.

**Circulation Goal:** Promote and support adequate public transportation within the City and the region.

**Circulation Goal:** Develop a safe and adequate pedestrian circulation system which is barrier free for the handicapped.

##### Conservation Element

The City's General Plan Conservation Element addresses the conservation, development, and use of natural resources.<sup>125</sup> Five specific areas of conservation and/or protection that are identified in the Conservation Element include (1) oil and gas production, (2) water production and provision for domestic use, (3) storm water runoff and waste water, (4) hazardous waste and solid waste disposal, and (5) air pollution.<sup>126</sup> The Conservation Element notes the following pollution-reducing measures, which would also reduce GHGs:

- Reducing numbers of vehicles being driven while increasing the utilization of high occupancy vehicles and alternative transportation;
- Requiring improvements to engine efficiency to decrease emissions; and
- Increasing the use of clean fuel vehicles.

As discussed previously, the proposed Project would comply with **PDF AQ-1** from the proposed Project's CCP. **PDF AQ-1** would require the use equipment that meets the USEPA's Final Tier 4 emissions standards for off-road diesel-powered construction equipment with 50 hp or greater, for all phases of construction activity. Additionally, **PDF AQ-1** would require smaller pieces of equipment to be electric or alternative-fueled (i.e., non-diesel) to the maximum extent feasible and would require construction vendors, contractors, and/or haul truck operators commit to using 2010 model year trucks. Finally, **PDF AQ-1** would require the use of electric or alternatively fueled (e.g., natural gas) sweepers with HEPA filters. Furthermore, the proposed Project would comply with fleet rules to reduce on-road truck emissions under

123 City of Inglewood, *Department of Community Development and Housing*, General Plan. January 1980

124 City of Inglewood, *Department of Community Development and Housing*, 1980. Land Use Element of the Inglewood General Plan. January 1980. Amended September 14, 2016.

125 City of Inglewood General Plan, "Conservation Element" (1997), General Plan. January 1980.

126 City of Inglewood General Plan, "Conservation Element" (1997), General Plan. January 1980.

CARBs Truck and Bus regulation.<sup>127</sup> Compliance with these measures and requirements would be consistent with the goals and policies of the Conservation Element.

Once in operation, the proposed Project would result in a decrease in GHG emissions pollutants (see **Impact GHG-1**). As shown on **Table 4.7-3**, the GHG emissions would result in net reductions under normal operations.

As discussed previously, the proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Metro K Line, and other transit providers as well as the City's major activity centers, such as the Forum, the LASED and HPSP. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce per-capita VMT.

For these reasons, the proposed Project would not conflict with Inglewood General Plan policies related to GHG emissions.

**Summary**

The proposed Project would be consistent with and implement the goals, policies, and regulations to reduce GHG emissions of the following:

- The 2017 Climate Change Scoping Plan Update, CARB's plan for achieving a 40 percent reduction on GHG emissions from 1990 levels by 2030, Statewide, as mandated by SB 32;
- SCAG's 2020-2045 RTP/SCS, the regional plan for achieving sustainable land use patterns that reduce passenger vehicle GHG emissions, as mandated by SB 375;
- The City General Plan; and
- The City's ECAP.

Impacts would be less than significant.

**Mitigation Measures**

No mitigation is required.

**Level of Significance after Mitigation**

As discussed, the proposed Project would be consistent with and implement the goals, policies, and regulations of the applicable plans to reduce GHG emissions.<sup>128</sup>

Impacts would be less than significant.

<sup>128</sup> CEQA Guidelines, Section 15064.3(b), *Determining Significant Impacts of Transportation Projects*.  
<sup>128</sup> CEQA Guidelines, Section 15064.3(b), *Determining Significant Impacts of Transportation Projects*.

**4.7.8 CUMULATIVE IMPACTS**

As discussed previously in *Section 4.7.3* above, GHG impacts are exclusively cumulative impacts, hence an evaluation of cumulative GHG impacts is already provided above and no further analysis is necessary.

**4.7.9 CONSISTENCY WITH CITY OF INGLEWOOD GENERAL PLAN**

As discussed above under **Impact GHG-2**, the proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Metro K line, and other transit providers as well as the City's major activity centers, such as the Forum, the LASED and HPSP. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce per-capita VMT. For these reasons, the proposed Project would not conflict with Inglewood General Plan policies related to GHG emissions.

## 4.8 HAZARDS AND HAZARDOUS MATERIALS

### 4.8.1 INTRODUCTION

This section of the Recirculated Draft EIR describes and evaluates potential impacts related to hazards and hazardous materials that could result from construction and operation of the proposed Project. Since circulation of the December 2020 Draft EIR, the footprint of the proposed ATS system has been modified to address stakeholder comments and to enhance the compatibility and visual character of the proposed Project with the existing and planned developments surrounding the proposed ATS system. The section contains: (1) a description of the existing land uses within the modified footprint of the proposed Project and surrounding areas as they pertain to hazardous materials use, as well as a description of the Adjusted Baseline Environmental Setting; (2) a summary of the federal, State, and local regulations related to hazards or hazardous materials; and (3) an analysis of the potential impacts related to hazards and hazardous materials associated with the implementation of the proposed Project, as well as identification of potentially feasible measures that could mitigate significant impacts.

After circulation of the December 2020 Draft EIR for public review, the City revised the design of the proposed Project in response to consultation with key stakeholders in the community and comments received on the December 2020 Draft EIR. Specific changes to the proposed Project include raising the height of the ATS guideway along Market Street to preserve existing views of historic buildings, relocating the Prairie Avenue/Pincay Drive Station to the southwest corner of Prairie Avenue and Manchester Boulevard, redesigning the proposed MSF to allow this facility to be located on the proposed site with a new Vons store, and realignment of the guideway and stations on Prairie Avenue to the west side of Prairie Avenue. These changes include updated construction and operational details which resulted in similar impacts to hazards and hazardous materials compared to the December 2020 Draft EIR.

In response to comments from the Inglewood Unified School District (IUSD) on the December 2020 Draft EIR, this section addresses potential hazards at IUSD schools, including incorporating the findings of a rail safety study prepared for Kelso Elementary School referenced below.

Information from the following hazard investigations conducted for the proposed Project were used in part to prepare this section:

- *Hazardous Material Assessment*, Geosyntec Consultants, July 3, 2018 (**Appendix L.1**),
- *Hazards and Hazardous Materials*, Geosyntec Consultants, July 3, 2018 (**Appendix L.2**),
- *Inglewood Transit Connector EDR Radius Map Report*, EDR, September 15, 2021 (**Appendix L.3**), and
- *Railroad Safety Study*, Inglewood Transit Connector Project, Meridian Consultants LLC, March 2021 (**Appendix L.4**)

Prior to the December 2020 Draft EIR, a Revised Initial Study (included in **Appendix A.2** of this Recirculated Draft EIR) was prepared using the California Environmental Quality Act (CEQA) Guidelines Environmental Checklist Form to assess potential environmental impacts associated with hazards and hazardous materials. Seven screening criteria were evaluated, and four were found to result in “no impact” or “less than significant impacts.” The proposed Project, as modified, does not change the findings of the Revised Initial Study as follow:

- The routine transport, use, or disposal of hazardous materials associated with the proposed Project, as modified would continue to result in “Less than Significant Impacts.” As discussed in the Revised Initial Study, construction and operation of the proposed Project would comply with existing federal, State, and local regulations, and routine precautions would be undertaken to reduce the potential for accidental releases of hazardous materials or substances. As such, the proposed Project, as modified from the Revised Initial Study would not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials and substances. Therefore, this issue is not addressed further in this section.
- Potential impacts related to being located within an airport land use plan or within two miles of a public airport, public use airport, or private airstrip, resulting in a safety hazard for people residing or working in the area were evaluated and determined to have “No Impact.” Los Angeles International Airport (LAX) is located more than 2 miles southwest and Hawthorne Municipal Airport is located approximately 2.75 miles southeast of the proposed Project area, as modified since the Revised Initial Study. The proposed Project would not construct any buildings or structures to a height that would interfere with or obstruct any airport operations. Therefore, this issue is not addressed further in this section.<sup>1</sup>
- Potential impacts related to the exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fire were evaluated and determined to have “No Impact.” The City is developed and urbanized and is without an urban/wildland interface. The footprint of the proposed Project alignment, as modified is not within a Moderate, High, or Very High Fire Hazard Severity Zone as designated by the California Department of Forestry and Fire Protection (CAL FIRE). Therefore, this issue is not addressed further in this section.<sup>2</sup>

The remaining three of seven screening criteria are addressed below in *Section 4.8.5: Thresholds of Significance*.

Impacts determined to be less than significant are discussed further in **Section 6.0: Other Environmental Considerations**. Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Recirculated Draft EIR.

<sup>1</sup> *Hazardous Material Assessment Technical Memorandum*, Geosyntec Consultants, July 3, 2018.

<sup>2</sup> *Hazardous Material Assessment Technical Memorandum*, Geosyntec Consultants, July 3, 2018.

## 4.8.2 METHODOLOGY

Hazardous materials generally refers to hazardous substances, hazardous waste, and other materials that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment. Hazardous materials are used in products (e.g., household cleaners, industrial solvents, paint, pesticides, etc.) and in the manufacturing of products (e.g., electronics, newspapers, plastic products, etc.). Hazardous materials can include petroleum products, natural gas, synthetic gas, acutely toxic chemicals, and other toxic chemicals that are used in agriculture, commercial and industrial uses, retail businesses, hospitals, and households. Accidental releases of hazardous materials can result from a variety of incidents, including highway incidents, warehouse fires, train derailments, shipping accidents, and industrial incidents.

The term “hazardous materials” as used in this section includes all materials defined in the California Health and Safety Code as follows:

*A material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. ‘Hazardous materials’ include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the unified program agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.*

The term includes chemicals regulated by the United States Department of Transportation (USDOT), the United States Environmental Protection Agency (USEPA), the California Department of Toxic Substances Control (DTSC), the California Governor’s Office of Emergency Services, and other agencies as hazardous materials, wastes, or substances.

Analysis in this section is focused on the use or management of hazardous or potentially hazardous materials resulting from construction and operational activities envisioned under the proposed Project. The severity of potential hazards to people, property, and the environment associated with the heightened interaction with hazardous materials associated with implementation of the proposed Project is also analyzed. Analysis in this section is based on various existing databases and historical data, including California Hazardous Material Incident Report System (CHMIRS), HAZNET, HIST CORTESE, and Los Angeles County Industrial Waste and Underground Storage Tank Sites. Contaminated site locations extracted from these databases are then delineated on the proposed Project guideway, stations, and MSF locations, and impacts are assessed according to the potential activities that would take place on specific sites.

Additionally, this section addresses short-term construction impacts resulting from demolition of underground storage tanks (USTs) and other existing (typically older) structures, work in the vicinity of historical oil well and pipeline activity, work in areas with previously documented soil contamination, and other subsurface construction activities, as well as operational impacts associated with the type of uses proposed and the materials that the operation of these uses would entail. In determining the level of significance, the analysis recognizes that all components of the proposed Project would be required to comply with relevant federal and State laws and regulations that are designed to ensure the safety of routine transport, use, management, or disposal of hazardous materials.

## 4.8.3 REGULATORY FRAMEWORK

The following presents the federal, State, and local regulatory framework, laws, ordinances, and regulations governing the proposed Project as related to hazards and hazardous materials (HHM).

### 4.8.3.1 Federal

#### *Occupational Safety and Health Act*

The Occupational Safety and Health Act (OSHA) is intended to create a safe workplace.<sup>3</sup> OSHA establishes procedures and standards for the safe handling and storage of hazardous chemicals. In addition, a safety data sheet (SDS) containing specified information must be provided to customers, making them aware of chemical hazards to which they may be exposed. OSHA also establishes standards regarding the safe exposure limits for chemicals to which construction workers may be exposed. Safety and Health Regulation for Construction<sup>4</sup> contains Compliance Guidelines for construction activities, which include occupational health and environmental controls to protect worker health and safety. These Guidelines articulate the required health and safety plan(s) to be developed and implemented during construction, including associated training, protective equipment, evacuation plans, chains of command, and emergency response procedures.

#### *Emergency Planning and Community Right-to-Know*

The Emergency Planning and Community Right-to-Know Act (EPCRA)<sup>5</sup> requires facilities that store or use hazardous chemicals to submit a specified plan with copies of SDSs to the State Emergency Response Center (SERC) and the local emergency planning center (LEPC). Additionally, facilities must submit an annual inventory list with details on the amount, location, and storage method of regulated chemicals present at the facility.<sup>6</sup>

<sup>3</sup> 29 USC Section 651 et seq. (1970), 29 CFR Section 1910 et seq. (1999).

<sup>4</sup> 29 CFR Section 1926.65 Appendix C – Compliance Guidelines (1993).

<sup>5</sup> 42 USC Section 116 et seq. (2010), 40 CFR Section 350 et seq. (2011).

<sup>6</sup> 40 CFR Section 370.20 et seq. (2002).

### **Toxic Substances Control Act**

The Toxic Substances Control Act (TSCA) enables USEPA to track industrial chemicals produced or imported into the United States.<sup>7</sup> USEPA screens the chemicals and can require testing to determine if any pose an environmental or human-health hazard. Any chemical that poses an unreasonable risk then can be regulated or banned from manufacturing or importation. Congress enacted major amendments to TSCA in 2016 via the Lautenberg Act,<sup>8</sup> which strengthened USEPA's authority to regulate chemicals.

### **Clean Air Act**

Section 112 of the Clean Air Act requires USEPA to set air toxics standards for regulating the emissions of hazardous air pollutants.<sup>9</sup> The 1990 federal Clean Air Act Amendments establish a program designed to prevent the release of highly hazardous chemicals.<sup>10</sup>

### **Resource Conservation and Recovery Act**

The Resource Conservation and Recovery Act (RCRA)<sup>11</sup> establishes design, construction, and operational standards to prevent chemical releases from USTs. RCRA, Subtitle I regulates USTs containing hazardous substances or petroleum. USEPA sets standards governing tank construction based on whether the tank is new or whether an existing tank is upgraded. USEPA also imposes operation and maintenance procedures for UST owners and operators and establishes reporting requirements from regulated tanks that release substances into the environment.

RCRA Subtitle C<sup>12</sup> is intended to proactively manage hazardous waste and to minimize and avoid hazardous waste contamination. RCRA Subtitle C addresses hazardous waste from cradle-to-grave, regulating the generation, transport, storage, treatment, and disposal of hazardous waste by "large-quantity generators" (1,000 kilograms/month or more). RCRA, Subtitle I, the Hazardous and Solid Waste Amendments (HSWA) of 1984, expanded and clarified RCRA Subtitle C. USEPA administers RCRA Subtitle C pursuant to regulations found at 40 CFR Section 260 et seq. and has delegated RCRA Subtitle C implementation and enforcement within California to the State. Under RCRA regulations, hazardous wastes must be tracked from the time of generation to the point of disposal. At a minimum, each generator of hazardous waste must register and obtain a hazardous waste activity identification number. If hazardous wastes are stored for more than 90 days or treated or disposed at a facility, any treatment, storage, or

<sup>7</sup> 15 USC Section 2601 et seq. (1976), 40 CFR Section 700 et seq. (2012).

<sup>8</sup> H.R. 2576 — 116th Congress, "Federal Government Advertising Equity Accountability Act," (2016).

<sup>9</sup> Clean Air Act Title I, Section 112, USC 7412 "Hazardous Air Pollutants."

<sup>10</sup> EPA, "The Clean Air Act – Highlights of the 1990 Amendments," United States Environmental Protection Agency, accessed June 22, 2020, <https://www.epa.gov/clean-air-act-overview/clean-air-act-highlights-1990-amendments>.

<sup>11</sup> 42 USC Section 6991 et seq., (1976), 40 CFR Section 280 et seq., (2014).

<sup>12</sup> 42 USC Section 6901 et seq.

disposal unit must be permitted under RCRA. Additionally, all hazardous waste transporters are required to be permitted and must have an identification number.

### **Hazardous Materials Transportation Act**

The Hazardous Materials Transportation Act regulates transport of hazardous materials on water, rail, highways, airplanes, and pipelines.<sup>13</sup> The US Department of Transportation (DOT) administers the Act.<sup>14</sup> Title 49 of the CFR specifies additional requirements and regulations with respect to the transport of hazardous materials. Title 49 of the CFR requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Drivers are also required to be trained in function and commodity specific requirements. In addition, vehicles transporting certain types or quantities of hazardous materials must display placards (warning) signs. Transporters of hazardous wastes must be permitted and have an identification number.

#### **4.8.3.2 State**

##### **Department of Toxic Substances Control**

At the State level, authority for the Statewide administration and enforcement of RCRA is enforced through CalEPA's DTSC. While the DTSC has primary State responsibility in regulating the generation, storage, and disposal of hazardous materials, DTSC may further delegate enforcement authority to local jurisdictions. In addition, the DTSC is responsible and/or provides oversight for contamination cleanup, and administers Statewide hazardous waste reduction programs.<sup>15</sup> DTSC operates programs to accomplish the following: (1) deal with the aftermath of improper hazardous waste management by overseeing site cleanups; (2) prevent releases of hazardous waste by ensuring that those who generate, handle, transport, store, and dispose of wastes do so properly; and (3) evaluate soil, water, and air samples taken at sites.

##### **Division of Occupational Safety and Health**

The California OSHA (Cal-OSHA) program is administered and enforced by the Division of Occupational Safety and Health (DOSH). The Cal-OSHA program is similar to the Federal OSHA program in that both programs contain rules and procedures related to exposure to hazardous materials during demolition and construction activities. In addition, Cal-OSHA requires employers to implement a comprehensive, written

<sup>13</sup> 49 USC Section 1801 et seq., (1975).

<sup>14</sup> 49 CFR Section 100 et seq., (2016).

<sup>15</sup> 22 CCR Division 4.5, "Environmental Health Standards for the Management of Hazardous Waste," 2020, [https://govt.westlaw.com/calregs/Index?transitionType=Default&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Index?transitionType=Default&contextData=(sc.Default)).

Injury and Illness Prevention Program (IIPP). An IIPP is an employee safety program for potential workplace hazards, including those associated with hazardous materials.<sup>16</sup>

### **California Highway Patrol and Department of Transportation**

The California Highway Patrol and California Department of Transportation (Caltrans) are the enforcement agencies responsible for hazardous materials transportation regulations. Hazardous materials and waste transporters are responsible for complying with all applicable packaging, labeling, and shipping regulations.<sup>17</sup> The provisions of this section apply to the highway transportation of hazardous materials and hazardous waste and include restrictions on labeling/placards, transportation routes, and other measures to ensure safe transport of regulated materials.

### **Hazardous Waste Control Act**

The Hazardous Waste Control Act was passed in 1972 and established the California Hazardous Waste Control Program within the Department of Health Services. California's hazardous waste regulatory effort became the model for the federal RCRA. California's program, however, was broader and more comprehensive than the federal system, regulating wastes and activities not covered by the federal program. California's Hazardous Waste Control Law<sup>18</sup> was followed by emergency regulations in 1973 that clarified and defined the hazardous waste program, as follows:

- Included definitions of what was a waste and what was hazardous as well as what was necessary for appropriate handling, processing, and disposal of hazardous and extremely hazardous waste in a manner that would protect the public, livestock, and wildlife from hazards to health and safety.
- The early regulations also established a tracking system for the handling and transportation of hazardous waste from the point of waste generation to the point of ultimate disposition, as well as a system of fees to cover the costs of operating the hazardous waste management program.
- Advancing the newly developing awareness of hazardous waste management issues, the program established a technical reference center, for public and private use, dealing with all aspects of hazardous waste management.

### **California Government Code Section 65962.5**

The Hazardous Waste and Substance Sites (Cortese) List is a planning document used by the State, local agencies, and developers to comply with the CEQA requirements in providing information about the location of hazardous materials release sites.<sup>19</sup> Government Code Section 65962.5 requires the California

<sup>16</sup> California Code of Regulations, Title 8 Section 3203, "Injury and Illness Prevention Program," 2020, <https://www.dir.ca.gov/title8/3203.html>.

<sup>17</sup> California Vehicle Code Division 13, Chapter 5, Article 1, Section 31303–31309

<sup>18</sup> Hazardous Waste Control Law, California Health and Safety Code sections 25100 et seq

<sup>19</sup> <https://calepa.ca.gov/sitecleanup/corteselist/>.

Environmental Protection Agency (CalEPA) to develop at least annually an updated Cortese List. The Department of Toxic Substances Control is responsible for a portion of the information contained in the Cortese List. Other State and local government agencies are required to provide additional hazardous material release information for the Cortese List.<sup>20</sup>

CEQA<sup>21</sup> requires the lead agency to consult the lists compiled pursuant to Government Code Section 65962.5 to determine whether a project and any project alternatives are identified on any of the following lists:

- **EPA NPL:** USEPA's National Priorities List (NPL) includes all sites under USEPA's Superfund program, which was established to fund cleanup of contaminated sites that pose risk to human health and the environment.
- **EPA CERCLIS and Archived Sites:** USEPA's Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) includes a list of 15,000 sites nationally identified as hazardous sites. This would also involve a review for archived sites that have been removed from CERCLIS due to No Further Remedial Action Planned (NFRAP) status.
- **EPA RCRIS (RCRA Info):** The Resource Conservation and Recovery Act Information System (RCRIS or RCRA Info) is a national inventory system about hazardous waste handlers. Generators, transporters, handlers, and disposers of hazardous waste are required to provide information for this database.
- **DTSC Cortese List:** DTSC maintains the Cortese list as a planning document for use by the State and local agencies to comply with the CEQA requirements in providing information about the location of hazardous materials release sites. This list includes the Site Mitigation and Brownfields Reuse Program Database (CalSites).
- **DTSC HazNet:** DTSC uses this database to track hazardous waste shipments.
- **SWRCB LUSTIS:** Through the Leaking Underground Storage Tank Information System (LUSTIS), the State Water Resources Control Board (SWRCB) maintains an inventory of USTs and leaking USTs, which tracks unauthorized releases.

The required lists of hazardous material release sites are commonly referred to as the "Cortese List," named after Dominic L. Cortese, the California State Assemblyman who authored the legislation. Because the statute was enacted more than 20 years ago, some of the provisions refer to agency activities that are no longer being implemented and, in some cases, the information required in the Cortese List does not exist. Those requesting a copy of the Cortese Lists are now referred directly to the appropriate information resources contained on internet websites hosted by the boards or departments referenced in the statute, including DTSC's online EnviroStor database and the SWRCB's online GeoTracker database.

<sup>20</sup> California Government Code Section 65962.5

<sup>21</sup> California Public Resources Code Section 21092.6.

Sites that are no longer considered “active” because the SWRCB, a regional board, or the County has determined that no further action is required because actions were taken to adequately remediate the release, or because the release was minor, presents no environmental risk, and no remedial action is necessary, are listed as “closed” and deleted from the list.<sup>22</sup>

#### **Hazardous Materials Business Plan**

Any business that handles, stores, or disposes of a hazardous substance at a given threshold quantity must prepare a hazardous materials business plan (HMBP). HMBPs are intended to minimize hazards to human health and the environment from fires, explosions, or an unplanned release of hazardous substances into air, soil, or surface water. The HMBP must be carried out immediately whenever a fire, explosion, or unplanned chemical release occurs. An HMBP includes three sections: (1) an inventory of hazardous materials, including a site map, which details their location; (2) an emergency response plan; and (3) an employee-training program. HMBPs serve as an aid to employers and employees in managing emergencies at a given facility. They also help better prepare emergency response personnel for handling a wide range of emergencies that might occur at the facility. Effective March 15, 2021, HMBPs are required to be submitted via the California Environmental Reporting System (CERS). The plans must be resubmitted, reviewed, revised, or amended as necessary every three years. The HMBP must also be amended within 30 days whenever there are changes in the amount or location of stored hazardous chemicals on a site. The Los Angeles County Fire Department, Hazardous Materials Division conducts routine inspections at businesses required to submit business plans. The purpose of these inspections is to (1) ensure compliance with existing laws and regulations concerning HMBP requirements, (2) identify existing safety hazards that could cause or contribute to an accidental spill or release, and (3) suggest preventative measures designed to minimize the risk of a spill or release of hazardous materials.<sup>23</sup>

#### **Risk Management Plan**

Any owner or operator of a stationary source (non-transportation) with more than a threshold quantity of a regulated substance is required to prepare a risk management plan. The State statutes and regulations combine federal- and State-program requirements for the prevention of accidental releases of listed substances into the atmosphere: the CalARP program. CalARP requires that a risk management plan include a hazard assessment program, an accidental release prevention program, and an emergency response plan. The risk management plan must be revised every 5 years or as necessary. Typical facilities or businesses that are required to prepare risk management plans include: ammonia refrigeration

<sup>22</sup> California Environmental Protection Agency, Cortese List: Section 65962.5(c), accessed March 2019, available at <https://calepa.ca.gov/sitecleanup/cortese/section-65962-5c/>.

<sup>23</sup> California Health and Safety Code Sections 25500–25520.

facilities, water treatment and wastewater treatment plants that handle chlorine gas, and facilities that store flammable chemicals such as methane and propane.<sup>24</sup>

#### **Titles 14, 22, 23, and 27 of the California Code of Regulations (CCR)**

Title 14 requires that gas storage fields be closely monitored by facility operators to ensure their safe operation and to establish that no damage to health, property, or natural resources occurs.<sup>25</sup> Titles 22 and 23 of the CCR address hazardous materials and wastes. Title 22 defines, categorizes, and lists hazardous materials and wastes including universal wastes.<sup>26</sup> Title 23 addresses public health and safety issues related to hazardous materials and wastes, and specifies disposal options.<sup>27</sup> Title 27 of the CCR addresses landfill closure standards and landfill-related public health and safety issues.<sup>28</sup>

#### **Unified Hazardous Waste and Hazardous Materials Management Regulatory Program**

In 1996, CalEPA adopted the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program). The Unified Program consolidates and coordinates the six State programs that regulate business and industry use, storage, handling, and disposal of hazardous materials and wastes. The Los Angeles County Fire Department is the Certified Unified Program Agency (CUPA) responsible for administering providing the regulatory oversight for federal, State, and local laws and regulations related to hazardous materials use and disposal within the City. The CUPA protects the public health and the environment from accidental releases and improper handling, storage, transportation, and disposal of hazardous materials and wastes through coordinated efforts of inspections, emergency response, enforcement, and site mitigation oversight. In addition, the Los Angeles County Fire Department Health and Hazardous Materials Division (HHMD) implements the following programs that are relevant to the proposed Project:<sup>29</sup>

- Hazardous Materials Release Response Plans and Inventory Program
- Hazardous Waste Generator Program
- California Accidental Release Prevention (CalARP) Program
- Aboveground Storage Tank Program
- Underground Storage Tank Program

<sup>24</sup> California Health and Safety Code Sections 25531–25543.3.

<sup>25</sup> California Code of Regulations, Title 14, “Natural Resources.”

<sup>26</sup> California Code of Regulations, Title 22, “Social Security.”

<sup>27</sup> California Code of Regulations, Title 23, “Waters.”

<sup>28</sup> California Code of Regulations, Title 27, “Environmental Protection.”

<sup>29</sup> California Senate Bill 1082.

### **California Human Health Screening Levels**

The California Human Health Screening Levels (CHHSLs or “Chisels”)<sup>30</sup> are concentrations of 54 hazardous chemicals in soil or soil gas that CalEPA considers to be below thresholds of concern for risks to human health. The CHHSLs were developed by the Office of Environmental Health Hazard Assessment on behalf of CalEPA. The CHHSLs were developed using standard exposure assumptions and chemical toxicity values published by the EPA and CalEPA. The CHHSLs can be used to screen sites for potential human health concerns where releases of hazardous chemicals to soils have occurred. Under most circumstances, the presence of a chemical in soil, soil gas, or indoor air at concentrations below the corresponding CHHSL can be assumed to not pose a significant health risk to people who may live or work at the site. There are separate CHHSLs for residential and commercial/industrial sites.

### **Senate Bill 1889, Accidental Release Prevention Law/CalARP**

Senate Bill (SB) 1889 required California to implement a new federally mandated program governing the accidental airborne release of chemicals promulgated under Section 112 of the Clean Air Act. Effective January 1, 1997, CalARP replaced the previous California Risk Management and Prevention Program and incorporated the mandatory federal requirements. CalARP addresses facilities that contain specified hazardous materials, known as “regulated substances,” which if involved in an accidental release could result in adverse off-site consequences. CalARP defines regulated substances as chemicals that pose a threat to public health and safety or the environment because they are highly toxic, flammable, or explosive.<sup>31</sup>

### **California Emergency Services Act**

The California Emergency Services Act<sup>32</sup> was adopted to establish the State’s roles and responsibilities during human-made or natural emergencies that result in conditions of disaster and/or extreme peril to life, property, or the resources of the State. This act is intended to protect health and safety by preserving the lives and property of the people of the State.

### **California Code of Regulations, Title 5, Section 14010(d) (Schools and Rail Safety)**

CCR Title 5, Section 14010(d) contains minimum standards for construction of school facilities including consideration of railroad safety when selecting new school sites. CCR Title 5, Section 14010(d) contains standards for school site selection, as it relates to railroad track easements. Specifically, Section 14010(d) provides that if a proposed site is within 1,500 feet of a railroad track easement, a safety study shall be undertaken by a professional trained in assessing cargo manifests, frequency, speed, and schedule of

<sup>30</sup> Health and Safety Code Section 57008.

<sup>31</sup> Health and Safety Code Sections 25531 – 25534.3.

<sup>32</sup> California Public Resources Code Section 8550 – 8669.7.

railroad traffic, grade, curves, type and condition of track need for sound or safety barriers, need for pedestrian and vehicle safeguards at railroad crossings, presence of high-pressure gas lines near the tracks that could rupture in the event of a derailment, preparation of an evacuation plan. It further provides that if required, reasonable mitigation measures must be identified.<sup>33</sup> While these standards only apply to the review and approval of sites for new schools, as discussed above, a rail safety study was prepared for Kelso Elementary School in response to a request from IUSD.

### **State Fire Regulations**

State fire regulations include those concerning building standards (as also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State fire marshal enforces these regulations and building standards in all State-owned buildings, State-occupied buildings, and State institutions throughout California.<sup>34</sup>

### **California Fire Code (Chapter 33, Fire Safety During Construction and Demolition)**

The California Fire Code, Chapter 33 related to fire safety during construction and demolition prescribes safeguards to provide reasonable safety to life and property from fire during such operations. Specific safeguards related to oil-fired heaters, gas heaters, refueling, smoking, waste disposal, welding, electrical, flammable, and combustible odors, water supply for fire protection, fire extinguishers, etc. Implementation of these safeguards are designed to reduce the potential of fire-related hazards during construction and demolition activities.<sup>35</sup>

### **State Water Resources Control Board**

The SWRCB operates under the authority of CalEPA, with a mission to preserve, enhance, and restore the quality of California’s water resources and drinking water for the protection of the environment, public health, and all beneficial uses, and to ensure proper water resource allocation and efficient use, for the benefit of present and future generations. There are nine regional water quality control boards (RWQCBs) that develop and enforce water quality objectives and implementation plans that will best protect the beneficial uses of the State’s waters. The RWQCBs develop “basin plans” for their hydrologic areas, govern requirements/issue waste discharge permits, take enforcement action against violators, and monitor water quality. The RWQCBs have the authority to require the remediation of sites where groundwater quality may be degraded by hazardous materials or substances releases from USTs or other sources. The proposed Project is within the jurisdiction of the Los Angeles RWQCB (Region 4). The Los Angeles RWQCB

<sup>33</sup> California Code of Regulations, Title 5, “School Facilities Construction,” Section 14010(d).

<sup>34</sup> California Health and Safety Code Section 13000 et seq.

<sup>35</sup> California Fire Code 2019.

#### 4.8 Hazards and Hazardous Materials

issued Order No. R4-2007-0019 which provides General Waste Discharge Requirements (WDRs) relative to the groundwater remediation at petroleum hydrocarbon fuel and/or volatile organic compound (VOC) impacted sites. The Order identifies a list of materials that can be used for in-situ remediation zone treatment purposes.<sup>36</sup>

The State Water Board adopted a Low-Threat Underground Storage Tank Case Closure Policy.<sup>37</sup> The Policy applies to petroleum UST sites subject to Chapter 6.7 of the Health and Safety Code. The Policy establishes both general and media-specific criteria.

Both Regional Water Boards and local agencies have been directed to review all cases in the petroleum UST Cleanup Program using the framework provided in the Policy. This review shall be accomplished within existing budgets and be performed no later than 365 days from the effective date of this Policy. These case reviews shall, at a minimum, include the following for each UST case:

1. Determination of whether or not each UST case meets the criteria in the Policy or is otherwise appropriate for closure based on a site-specific analysis.
2. If the case does not satisfy the criteria in this Policy or does not present a low-risk based upon a site-specific analysis, impediments to closure shall be identified.
3. Each case review shall be made publicly available on the State Water Board's GeoTracker web site

If both the general and applicable media-specific criteria are satisfied, then the leaking UST case is generally considered to present a low threat to human health, safety, and the environment. The Policy recognizes, however, that even if all of the specified criteria in the Policy are met, there may be unique attributes of the case or site-specific conditions that increase the risk associated with the residual petroleum constituents. In these cases, the regulatory agency overseeing corrective action at the site must identify the conditions that make case closure under the Policy inappropriate.

#### **Asbestos-Containing Materials and Lead-Based Paint**

Several regulations and guidelines pertain to abatement of and protection from exposure to asbestos-containing materials (ACM) and lead-based paint (LBP), including Construction Safety Orders 1529 (pertaining to ACM) and Section 1532.1 (pertaining to LBP) from CCR, Title 8, and Part 61, Subpart M, of the Code of Federal Regulations (pertaining to ACM). California Health and Safety Code Section 39650 et seq. provides further regulations on airborne toxic control measures. In California, ACM and LBP abatement must be performed and monitored by contractors with appropriate certification from the

<sup>36</sup> LARWQCB Basin Plan, March 13, 2020, [https://www.waterboards.ca.gov/losangeles/water\\_issues/programs/basin\\_plan/](https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/).

#### 4.8 Hazards and Hazardous Materials

California Department of Health Services. Asbestos is also regulated as a hazardous air pollutant under the Clean Air Act and a potential worker safety hazard under the authority of Cal/OSHA. Requirements for limiting asbestos emissions from building demolition and renovation are specified in SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities); see below. California Government Code Sections 1529 and 1532.1 provide for exposure limits, exposure monitoring, respiratory protection and good working practice by workers exposed to lead and ACMs.

#### **Other Hazardous Materials**

The removal of hazardous materials, such as PCBs, mercury-containing light ballast, and mold, must be completed in accordance with applicable regulations pursuant to 40 CFR 761 (PCBs), 40 CFR 273 (mercury-containing light ballast), and 29 CFR 1926 (molds) by workers with the hazardous waste operations and emergency response (HAZWOPER) training, as outlined in 29 CFR 1910.120 and 8 CCR 5192.

#### **4.8.3.3 Regional and Local**

##### **South Coast Air Quality Management District**

Remediation of contamination has the potential to expose workers to hazardous emissions. The South Coast Air Quality Management District (SCAQMD) regulates emissions from soil remediation activities through Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil. This rule requires development and approval of a mitigation plan, monitoring of VOC concentrations, and implementation of the mitigation plan if VOC-contaminated soil is detected.<sup>38</sup>

SCAQMD Rule 1403 specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of ACM. The rule's requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and cleanup procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials (ACWM).<sup>39</sup>

##### **Regional Water Quality Control Board**

USTs are regulated under Subtitle I of RCRA and its implementing regulations, which establish construction standards for new UST installations, as well as standards for upgrading existing USTs and associated piping. After 1998, all nonconforming tanks were required to be either upgraded or closed.

<sup>38</sup> Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, AQMD, 2001, <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

<sup>39</sup> Rule 1403 – Asbestos Emissions from Demolition/Renovations Activities, AQMD, 2007, <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.

#### 4.8 Hazards and Hazardous Materials

The storage of hazardous materials in USTs is regulated by CalEPA's SWRCB, which has delegated authority to each of the nine RWQCBs and, typically on the local level, to the local fire department. The State's UST Program regulations include, among others, permitting USTs, installation of leak detection systems and/or monitoring of USTs for leakage, UST closure requirements, release reporting/corrective action, and enforcement. The State's Site Cleanup Program (SCP)<sup>40</sup> regulates and oversees the investigation and cleanup of unauthorized discharges of pollutants and pollution-impaired sites not overseen by the UST Program.<sup>41</sup> The primary goal of the SCP is to direct and provide oversight of site investigation and cleanup activities that will result in restoration and/or protection of water quality, human health, and the environment.

#### **Los Angeles County Fire Department**

At the local level, the County of Los Angeles Fire Department (LACoFD) monitors the storage of hazardous materials in the City for compliance with local requirements. Specifically, businesses and facilities which store more than threshold quantities of hazardous materials are required to file an Accidental Risk Prevention Program with the LACoFD. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. The LACoFD also has delegated authority to administer and enforce Federal and State laws and local ordinances for USTs. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LACoFD Inspectors.<sup>42</sup>

The LACoFD administers and enforces federal and State laws and local ordinances for USTs in the City of Inglewood. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LACoFD Inspectors.

#### **City of Inglewood General Plan**

The City's General Plan, Safety Element outlines the following relevant measures as means to minimize the dangerous aspects of hazardous materials:<sup>43</sup>

- Enforcement of the State law that requires businesses involved with hazardous materials to disclose the quantities of hazardous materials, their locations, their disposal, and a management plan designed to decrease risks to the public.
- Private businesses and government agencies must continue to update and prepare the proper emergency responses in the event of a spill or explosion.

<sup>40</sup> 42 USC Section 6901 et seq.

<sup>41</sup> 42 USC Section 6901 et seq.

<sup>42</sup> California Health and Safety Code, Chapter 6.95.

<sup>43</sup> *City of Inglewood* General Plan, "Safety Element" (1995).

#### 4.8 Hazards and Hazardous Materials

- The City must have continuous coordination among its staff to ensure that hazardous material operations are located in zones and facilities that are appropriate and safe for such use.
- The City must ensure that these uses are located safe distances from residences, schools, hospitals, large assemblages of people, etc.
- The City must inform the public of the potential perils that accompany hazardous material sites. Public awareness as acquired through public education programs will enable the citizenry to learn to protect themselves by observing and implementing safety procedures during a spill or explosion.

The City's General Plan, Safety Element identifies evacuation routes that assume worst-case displacement and surface rupture from a seismic event. Within the City, Florence Avenue, La Brea Avenue, Crenshaw Boulevard, and Imperial Highway are identified as designated evacuation routes. In addition, the Safety Element of the General Plan identifies emergency corridors that can be most readily opened immediately following a seismic event. These include Inglewood Avenue, La Brea Avenue/Hawthorne Boulevard, Prairie Avenue, Crenshaw Boulevard, La Cienega Boulevard, Van Ness Avenue, West Boulevard, Florence Avenue, Manchester Boulevard, Century Boulevard, Imperial Highway, and Centinela Avenue.

#### **City of Inglewood Multi-Hazard Mitigation Plan and Emergency Operation Plan**

The City of Inglewood Multi-Hazard Mitigation Plan (MHMP) was developed to reduce or eliminate long-term risk to human life and property from both natural and man-made hazards.<sup>44</sup> The plan includes a list of mitigation measures to be implemented in order to meet identified goals and objectives related to emergency readiness and hazard reduction. In addition, the City prepared an Emergency Response Plan to comply with the California Standardized Emergency Management System and the Federal Emergency Management Agency (FEMA) National Incident Management System. The plan includes information on the Emergency Operations Organization, the roles, and responsibilities of each City division, and includes operational checklists to guide response actions. The City's Multi-Hazard Mitigation plan was adopted on August 18, 2009, with a 5-year planning horizon. The City is currently undergoing the development of a revised and updated plan.

The City's Office of Emergency Services (OES) acts in coordination with all City departments to maximize the City's potential to prevent, prepare for, respond to, and recover from both natural and man-made emergencies and disasters. The 2010 MHMP generally provides a means to prepare and maintain systems, supplies and other logistical items to support emergency/disaster response and recovery among City departments. According to the MHMP, "all future development/redevelopment projects will be

<sup>44</sup> *City of Inglewood*, Multi-Hazard Mitigation Plan, March 23, 2010.

4.8 Hazards and Hazardous Materials

constructed to current design standards and building codes and are not expected contribute to community vulnerability from natural or technological hazards.”<sup>45</sup> The overall goals of the plan are to:

- Minimize the loss of life and property from natural hazard events
- Protect public health and safety
- Increase public awareness of risk from natural hazards
- Enhance emergency services including warning systems

**City of Inglewood Municipal Code**

The Inglewood Municipal Code adopts the Los Angeles County Fire Code as the Fire Code of the City.<sup>46</sup> Additionally, the Municipal Code designates the LACoFD as the administering agency for the hazardous material inventory and emergency response program within the City, including the provisions of the California Hazardous Materials Release Response Plans and Inventory Law and other hazardous materials related regulations.<sup>47</sup> These sections of the Municipal Code set forth requirements to ensure fire safety of new and reconstructed buildings within Inglewood.

**4.8.4 EXISTING CONDITIONS**

**Sensitive Receptors**

The proposed Project alignment is located along North Market Street, West Manchester Boulevard, and South Prairie Avenue, which are zoned for transit oriented development, including commercial and residential development, and mixed use. Surrounding uses are mainly commercial, although there are some sensitive land uses, including residences, schools, and childcare facilities. Schools and daycare facilities within one-quarter mile (1,320 feet) of the proposed alignment of the ATS system are identified below:

**Table 4.8-1  
School and Daycare Facilities Near the Project**

Name	Address	Distance (ft.)	Direction
A Bright Beginning Child Development Center	712 Manchester Blvd	25	South
A Bright Beginning Infant and Toddler Center	503 Prairie Ave	25	West
Kelso Elementary School	809 Kelso St	25	West
Slauson Learning Center	260 Locust St	40	East
Tender Care Child Development center	335 Spruce Ave	75	Southwest
Wilder Preparatory Academy Charter School	336 Spruce Ave	100	Southwest

45 City of Inglewood, 2010. Multi-Hazard Mitigation Plan, March 23, 2010.  
 46 Inglewood Municipal Code, “Chapter 6, Article 1: Fire Code and Amendments,” <https://www.qcode.us/codes/inglewood/view.php?topic=6-1&frames=off>.  
 47 Inglewood Municipal Code, “Chapter 6, Article 2, Section 6-5: Hazardous Materials Disclosure Agency,” [https://www.qcode.us/codes/inglewood/view.php?topic=6-2-6\\_5&frames=off](https://www.qcode.us/codes/inglewood/view.php?topic=6-2-6_5&frames=off).

4.8 Hazards and Hazardous Materials

Family First Charter School	110 La Brea Ave	120	West
Canterbury Learning Academy	204 S. La Brea Ave	350	West
South Bay Child Development Center	521 Queen St	370	North
Debbie’s Child Development Center	521 Osage Ave	470	West
Inglewood Adult School	106 E Manchester Blvd	600	West
City Honors College Preparatory Academy	120 Regent St	1,000	West
George W Crozier Middle School	120 Regent St	1,000	West
Inglewood High School	231 Grevillea Ave	1,000	West
VLT Learning Center	233 Spruce St	1,090	Southwest
Dolores Huerta Elementary School	4125 105th St	1,250	Southwest
City Honors High School	155 Kelso St	1,400	Southwest

**Properties Listed on Government Databases**

A review of local, State, and federal government-maintained databases for properties within one mile of the proposed Project alignment that release and/or have released hazardous materials was conducted by Environmental Database Resources, Inc. (EDR). The EDR report did not include listings of areas of the proposed Project within the existing public right-of-way. However, properties listed that are within the proposed Project alignment—i.e., those that would require full or partial acquisition and/or an easement (see **Table 3.0-5: Anticipated Project Acquisitions**)—are as follows:

**Table 4.8-2  
Properties Within Proposed Project Alignment Listed on  
Government Databases for Hazardous Materials**

Addresses	Government Databases <sup>1</sup>
317 and 333 E. Florence Avenue	Cortese, CERS, CERS TANKS, ECHO, FINDS, HAZNET, LACHMS, LUST RCRA-LQG, UST
200–270 N. Market Street (even number addresses) and 300–330 E. Florence Avenue (Commercial property northeast of Market at Regent Avenue)	CERS, CERS HAZ WASTE, DRYCLEANERS, ECHO, EDR Hist Auto, EDR Hist Cleaner, EMI, FINDS, HAZNET, HWTS, RCRA-SQG, RCRA-LQG, RCRA NonGen/NLR
500 and 510 E. Manchester Boulevard	CERS, CERS HAZ WASTE, CERS TANKS, CHMIRS, CIWQS, Cortese, ECHO, FINDS, LUST, HIST CORTESE, HIST UST, HAZNET, HWTS, LACHMS, NPDES, RCRA-LQG, RCRA NonGen/NLR, SWEEPS UST, UST
600 S. Prairie Avenue	CERS, Cortese, ECHO, EMI, FINDS, HAZNET, LACHMS, LUST, RCRA-LQG, RCRA NonGen/NLR, UST
923 S. Prairie Avenue	CERS
3900 W. Manchester	CA FID UST, CERS, CERS HAZ WASTE, Cortese, HIST UST, LACHMS, LUST, RCRA NonGen/NLR, SWEEPS UST, UST
1035–1051 S. Prairie Avenue (odd number addresses; commercial property northwest of Prairie at Hardy Street)	DRYCLEANERS, ECHO, EMI, EDR Hist Cleaner, CERS, FINDS, RCRA NonGen/NLR

<sup>1</sup> Description of Database Acronyms:  
 CA FID UST = Facility Inventory Database contains active and inactive underground storage tank from State Water Resource Control Board  
 CERS = California Environmental Protection Agency (CalEPA) combines data about environmentally regulated sites and facilities in California into a single database  
 CERS HAZ WASTE = California Environmental Protection Agency (CalEPA) Regulated Site Portal  
 CERS TANKS = CERS Aboveground Petroleum Storage and Underground Storage Tank  
 CHMIRS = California Hazardous Material Incident Report System from the California Office of Emergency Services  
 CIWQS = California Integrated Water Quality System used by the State and RWQCB to track information about places of environmental interest, manage permits and other orders, track inspections, and manage violations and enforcement activities  
 Cortese = These sites are designated by the State Water Resource Control Board (LUST), the Integrated Waste Board (SWF/LS), and DTSC  
 DRYCLEANERS = A list of drycleaner related facilities that have EPA ID numbers

**4.8 Hazards and Hazardous Materials**

ECHO = Provided by EDR, ECHO provides integrated compliance and enforcement information for about 800,000 facilities nationwide  
 EDR Hist Auto = EDR Exclusive Records of listings of potential gas station/filling station/service station sites  
 EDR Hist Cleaner = EDR Exclusive Records of listings of potential dry cleaner sites  
 EMI = Toxics and criteria pollutant emissions data collected by the Air Resources Board and local air pollution agencies  
 FINDS = Facility Index System contains both facility information and "painters" to other sources of information  
 HAZNET = Data is extracted from the copies of hazardous waste manifests received each year by the DTSC  
 HIST CORTESE = Same as Cortese, but no longer updated by the agencies  
 HIST UST = Historical UST Registered Database  
 HWTS = Registered Hazardous Waste Site  
 LACHMS = Los Angeles County Hazardous Materials Sites, Los Angeles County Industrial Waste and Underground Storage Tank Sites  
 LUST = Leaking Underground Storage Tank in GeoTracker  
 NPDES = A listing of National Pollutant Discharge Elimination System permits, including stormwater  
 RCRA-LQG = Resource Conservation and Recovery Act-Large Quantity Generators  
 RCRA-SQG = Resource Conservation and Recovery Act-Small Quantity Generators  
 RCRA NonGen / NLR = RCRA Non-Generators that do not presently generate hazardous waste  
 SWEEPS UST = Statewide Environmental Evaluation and Planning System Underground Storage Tank  
 UST = Underground Storage Tank in State Water Resources Control Board's Hazardous Substance Storage Container Database

Source: Inglewood Transit Connector, The EDR Radius Map Report. Environmental Data Resources, Inc. 2021, September 15.

Properties listed in government databases do not necessarily represent environmental concerns. Some databases track properties because there are special conditions, while others track properties that hold permits for the storage, operation, generation, and/or emission of hazardous materials.

Properties within 500 feet to the proposed Project alignment that are listed on government databases are provided below:

**Table 4.8-3  
 Properties Adjacent to Proposed Project Alignment Listed on  
 Government Databases for Hazardous Materials**

Addresses	Government Databases <sup>1</sup>
200 E. Beach Avenue	CERS, CERS HAZ WASTE, CIWQS, EMI, NPDES, RCRA NonGen/NLR, SEMS-ARCHIVE, WDS
301 and 412 E. Florence Avenue	RCRA NonGen / NLR
220 and 230 N. La Brea Avenue	CERS HAZ WASTE, EDR Hist Auto, HAZNET, HWTS, RCRA-SQG, RCRA-VSQG
304, 330, and 341 E. Queen Avenue	EDR Hist Auto, EDR Hist Cleaner, RCRA NonGen/NLR
216 and 257 S. Market Street	EDR Hist Auto, EDR Hist Auto, CERS HAZ WASTE, HAZNET, HWTS
112, 136, and 205 N. Market Street	EDR Hist Cleaner
300, 336, and 401 E. Hillcrest Boulevard	ECHO, FINDS, HAZNET, HIST UST, HWTS, RCRA NonGen/NLR, RCRA-SQG
400 E. Kelso Avenue	ECHO, FINDS, RCRA NonGen/NLR
650 E. Nutwood Street	RCRA NonGen/NLR
115 S. Locust Avenue	RCRA NonGen/NLR
151 N. Locust Avenue	RCRA NonGen/NLR
924 S Osage Avenue	RCRA NonGen/NLR
231, 400, 425, 501, 600, 700, and 811 E. Manchester Boulevard	CERS, CERS HAZ WASTE, DRYCLEANERS, ECHO, EDR Hist Auto, EDR Hist Cleaner, FINDS, HAZNET, HIST UST, HWTS, LUST, RCRA NonGen/NLR, RGA LUST, SWEEPS UST, UST
South Locust Street and Manchester Ave	CHMIRS
601 S. Prairie Avenue	CERS TANKS, EDR Hist Auto, HIST UST, LACHMS, SWEEPS UST, UST

**4.8 Hazards and Hazardous Materials**

**Table 4.8-3  
 Properties Adjacent to Proposed Project Alignment Listed on  
 Government Databases for Hazardous Materials**

801 S. Prairie Avenue	RCRA NonGen/NLR
837 S. Prairie Avenue	EDR Hist Cleaner
911 S. Prairie Avenue	CERS, CERS HAZ WASTE, CERS TANKS, DRYCLEANERS, ECHO, EDR Hist Cleaner, EMI, drycleaners, FINDS, HAZNET, HWTS, RCRA NonGen/NLR
950 S. Prairie Avenue	RCRA NonGen/NLR

1. Description of Database Acronyms:  
 CERS = California Environmental Protection Agency (CalEPA) combines data about environmentally regulated sites and facilities in California into a single database  
 CERS HAZ WASTE = California Environmental Protection Agency (CalEPA) Regulated Site Portal  
 CERS TANKS = CERS Aboveground Petroleum Storage and Underground Storage Tank  
 CHMIRS = California Hazardous Material Incident Report System from the California Office of Emergency Services  
 CIWQS = California Integrated Water Quality System used by the State and RWQCB to track information about places of environmental interest, manage permits and other orders, track inspections, and manage violations and enforcement activities  
 DRYCLEANERS = A list of drycleaner related facilities that have EPA ID numbers  
 ECHO = Provided by EDR, ECHO provides integrated compliance and enforcement information for about 800,000 facilities nationwide  
 EDR Hist Auto = EDR Exclusive Records of listings of potential gas station/filling station/service station sites  
 EDR Hist Cleaner = EDR Exclusive Records of listings of potential dry cleaner sites  
 EMI = Toxics and criteria pollutant emissions data collected by the Air Resources Board and local air pollution agencies  
 FINDS = Facility Index System contains both facility information and "painters" to other sources of information  
 HAZNET = Data is extracted from the copies of hazardous waste manifests received each year by the DTSC  
 HIST UST = Historical UST Registered Database  
 HWTS = Registered Hazardous Waste Site  
 LACHMS = Los Angeles County Hazardous Materials Sites, Los Angeles County Industrial Waste and Underground Storage Tank Sites  
 LUST = Leaking Underground Storage Tank in GeoTracker  
 NPDES = A listing of National Pollutant Discharge Elimination System permits, including stormwater  
 RCRA-SQG = Resource Conservation and Recovery Act-Small Quantity Generators  
 RCRA NonGen / NLR = RCRA Non-Generators that do not presently generate hazardous waste  
 RCRA-VSQG = RCRA Very Small Generators  
 RGA LUST = EDR Recovered Government Archive Leaking Underground Storage Tank database  
 SEMS-ARCHIVE = Superfund Enterprise Management System Archive  
 SWEEPS UST = Statewide Environmental Evaluation and Planning System Underground Storage Tank  
 UST = Underground Storage Tank in State Water Resources Control Board's Hazardous Substance Storage Container Database  
 WDS = California Water Resources Control Board - Waste Discharge System

Source: Inglewood Transit Connector, The EDR Radius Map Report. Environmental Data Resources, Inc. 2021, September 15.

**Underground Storage Tanks**

Soils and groundwater in the City have the potential to be contaminated due to historical spills and leaking USTs. A UST is defined by law as "any one or combination of tanks, including pipes connected thereto, that is used for the storage of hazardous substances and that is substantially or totally beneath the surface of the ground" (certain exceptions apply).<sup>48</sup> There are nine known Leaking Underground Storage Tanks

48 California State Water Resources Control Board, Division of Water Quality, "Underground Storage Tank Program," accessed March 2019, available at <https://www.waterboards.ca.gov/ust/>.

#### 4.8 Hazards and Hazardous Materials

(LUSTs) within 500 feet of the proposed Project identified by the State Water Resources Control Board.<sup>49</sup> These locations are listed as follows and are arranged by proximity to each guideway segment:

##### Market Street Segment

- **317 E. Florence Avenue** (Los Angeles County Metropolitan Transportation Authority [Metro]); RWQCB Case Number R-60173 involved potential contamination of gasoline in soil; remediation completed, and case closed as of January 13, 2017; and
- **230 N. La Brea Avenue** (Fujita Corporation); RWQCB Case Number R-37884 involved potential contamination of gasoline; case closed as of September 10, 2003.

##### Manchester Boulevard Segment

- **501 E. Manchester Boulevard** (Simon's Mini Market); RWQCB Case Number I-13094 involved potential contamination of gasoline in drinking water aquifer; remediation completed, and case closed as of November 1, 2006;
- **501 E. Manchester Boulevard** (Simon's Mini Market); Los Angeles County Department of Public Works case number 009805-013094; remediation completed, and case closed as of January 9, 2014;
- **500 E. Manchester Boulevard** (former Sears Auto Center); RWQCB Case Number I-09429 involved potential contamination of gasoline in soil; remediation completed, and case closed as of July 19, 1996;
- **3900 W. Manchester Boulevard** (the Forum); RWQCB Case Number R-09447 involved potential contamination of gasoline in soil; remediation completed, and case closed as of February 23, 1998;
- **3900 W. Manchester Boulevard** (the Forum); RWQCB Case Number R-09447A involved potential contamination of gasoline, methyl tertiary-butyl ether (MTBE)/tert-Butyl alcohol (TBA)/other fuel oxygenates, and tetrachloroethylene (PCE) in drinking water aquifer; remediation completed, and case closed as of July 15, 2013; and
- **145 E. Manchester Boulevard** (UNOCAL #1923); RWQCB Case Number I-09888; leaking tank closed and case closed as of October 7, 1993.

##### Prairie Avenue Segment

- **600 S. Prairie Avenue** (former Airport Park Hotel); RWQCB Case Number R-63615 involved potential contamination of gasoline in soil; remediation completed, and case closed as of April 10, 2018.

<sup>49</sup> California State Water Resources Control Board, GeoTracker, accessed September 2021, available at <https://geotracker.waterboards.ca.gov/>.

#### 4.8 Hazards and Hazardous Materials

All identified LUST cases have been remediated and closed at the time of this analysis. Per the California DTSC, there are no other contaminated, State agency-monitored properties in the vicinity of the proposed Project.<sup>50</sup>

Further, the SWRQCB identifies a number of registered USTs within 500 feet of the proposed Project guideway segments, listed as follows:<sup>51</sup>

##### Market Street Segment

- **317 E. Florence Avenue** (Metro), LACoFD facility ID not available; and
- **111 N. Locust Street** (Senior Center Site), LACoFD facility ID not available.

##### Manchester Boulevard Segment

- **145 E. Manchester Boulevard** (Wowsj Mart), LACoFD facility ID LACoFA0017377;
- **338 E. Manchester Street** (Retail Boutique), LACoFD facility ID not available;
- **450 E. Manchester Boulevard** (Bruno's Burgers), Statewide Environmental Evaluation and Planning System (SWEEPS) UST S106923602;
- **501 E. Manchester Boulevard** (G&M Oil Co #193), LACoFD facility ID LACoFA001738; and
- **510 E. Manchester Boulevard** (Vons Fuel Center #2502), LACoFD facility ID LACoFA0033888.

##### Prairie Avenue Segment

- **601 S. Prairie Avenue** (Miles Mini Mart), LACoFD facility ID LACoFA0021214;
- **600 S. Prairie Avenue** (Pincay 60-Acre Property [Hollywood Park property]), LACoFD facility ID not available; and
- **1050 S. Prairie Avenue** (Hollywood Park Racetrack), LACoFD facility ID LACoFA0021198.

Three of these registered USTs are located within the footprint of the proposed Project: The Metro K Line at 317 E. Florence Avenue, Vons Fuel Center at 510 E. Manchester Boulevard, and the Hollywood Park (LASED) property at 600 S. Prairie Avenue.

The Vons Fuel Center #2502 at 510 E. Manchester Boulevard (facility ID LACoFA0033888) is proposed for removal as part of the proposed Project. The portion of the Vons property containing the gas station is proposed for use as a surface parking area for the new Vons replacement store. As part of the demolition process for the proposed Project, this UST facility would be closed and removed from the site. The site

<sup>50</sup> California Department of Toxic Substances Control, EnviroStor, accessed March 2019, available at <https://www.envirostor.dtsc.ca.gov/public/>.

<sup>51</sup> California State Water Resources Control Board, GeoTracker, accessed September 2021, available at <https://geotracker.waterboards.ca.gov/>.

would be remediated for any contamination in accordance with the appropriate regulatory requirements pursuant to UST closure and any additional regulatory requirements; closure requirements and approval would be sought from the jurisdiction having authority included the LARWQCB.

### Historical Oil and Gas Extraction Activities

The City is located within the southern portion of a large oil field that includes Baldwin Hills to the northwest of the Project. The oil deposits in this oil field have been explored and actively extracted for nearly a century.<sup>52</sup> Records indicate a substantial number of abandoned, plugged, or idle oil and gas and dry hole wells in the City.<sup>53,54</sup> The Potrero Oil Field traverses much of the northern and eastern portions of the City, including portions of the proposed Project including the Market Street Segment and Manchester Boulevard Segment of the guideway.<sup>55</sup> Contaminants frequently associated with oil and gas activities include crude oil, refined petroleum products, drilling mud, metals, PCBs, pesticides and volatile organic compound (VOCs) impacts in soil and soil vapor. Potential sources for these contaminants include oil wells, well cellars, pumps, pipes, sumps, storage tanks, separators, transformers, and application of petroleum products/crude oil (likely containing PCBs and pesticides) for dust/weed control. As commonly found near oil and gas fields, the subsurface conditions in the vicinity of the proposed Project may also include naturally occurring methane and hydrogen sulfide gas.<sup>56</sup>

While the City is entirely urbanized and largely precluded from future oil exploration and drilling, a number of historical oil and gas exploration and drilling activities have occurred in the vicinity of the proposed Project. These locations are listed as follows, according to their unique American Petroleum Institute (API) well number and Project guideway segment:

#### Manchester Boulevard Segment

- **API 0403713694**; oil and gas well located within the Potrero Oil Field on the southeastern side of Spruce Avenue, approximately 90 southeast of the proposed MSF site across Spruce Avenue and 150 feet southwest of the Spruce Avenue and Manchester Boulevard intersection; plugged and abandoned

52 City of Inglewood, General Plan Update Technical Background Report, August 2006.

53 Dry hole wells are oil, water, or gas wells which are determined not to be commercially profitable.

54 California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR), Well Statewide Tracking and Reporting System (WellSTAR) database, interactive map, accessed March 2019, available at <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.94276/37.10257/6>.

55 California Department of Conservation, DOGGR, WellSTAR, interactive map, accessed March 2019, available at <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.94276/37.10257/6>.

56 *Hazardous Material Assessment*, Geosyntec Consultants, July 3, 2018.

to the satisfaction of the California Department of Natural Resources, Division of Oil and Gas (now DOGGR) as of March 5, 1930.<sup>57,58</sup>

#### Prairie Avenue Segment

- **API 0403705654**; dry hole well located on the southern side of Nutwood Street, approximately 150 feet west of Prairie Avenue; plugged and abandoned to the satisfaction of the California Department of Natural Resources, Division of Oil and Gas (now DOGGR) as of March 19, 1930.<sup>59,60</sup>

No previously identified oil and gas or dry hole wells are located within the footprint of the proposed Project guideway, stations, or parcels that would be used for support facilities.

#### Aged Buildings

In urbanized areas such as those in the vicinity of the proposed Project, risk from hazards and hazardous materials are associated with historical land uses involving the use of hazardous materials for building construction (lead and asbestos) or for operation for uses such as auto repair shops, medical offices, dry cleaners, and photo processing centers. Many of the existing buildings in the area were constructed from the 1920s through the 1980s. Based on their age, these older buildings may contain asbestos, LBPs and potentially toxic finishes, molds, and/or PCBs that could be released during demolition or renovation activities. Typical hazardous materials of concern for existing older structures include the following:

- **Asbestos** is a mineral fiber that is carcinogenic and harmful to respiratory health and is considered both a hazardous air pollutant and a human health hazard. Because of its fiber strength and heat resistance, it was widely used prior to the 1980s in California in a variety of building construction materials for insulation, fire-retardation, and friction and heat-resistant products, such as ducting insulation, wallboard, shingles, ceiling tiles, floor tiles, insulation, plaster, and floor backing. Thus, buildings constructed prior to 1980 could contain ACM. The risk to human health is from inhalation of airborne asbestos, which commonly occurs when ACM are disturbed during activities such as demolition and renovation. Due to the age of the buildings within the area, it is likely that ACM are present.
- **Lead** is a recognized harmful environmental pollutant exposed through air, drinking water, food, soils, paint, and dust. Lead was widely used in paint, gasoline, water pipes, and many other products prior to 1977 when the U.S. Consumer Product Safety Commission banned the use of lead-based paint.

57 California Department of Conservation, DOGGR, WellSTAR, Well Details for API # 03713694, accessed March 2019, available at <https://secure.conservation.ca.gov/WellSearch/Details?api=03713694#main-content>.

58 California Department of Natural Resources, Division of Oil and Gas (now DOGGR), WellSTAR, Well Record for API #03713694, accessed March 2019, available at [https://secure.conservation.ca.gov/WellRecord/037/03713694/03713694\\_2018-02-27\\_DATA.pdf](https://secure.conservation.ca.gov/WellRecord/037/03713694/03713694_2018-02-27_DATA.pdf).

59 California Department of Conservation, DOGGR, WellSTAR, Well Details for API # 03705654, accessed March 2019, available at <https://secure.conservation.ca.gov/WellSearch/Details?api=03705654>.

60 California Department of Natural Resources, Division of Oil and Gas (now DOGGR), WellSTAR, Well Record for API # 03705654, accessed March 2019, available at [https://secure.conservation.ca.gov/WellRecord/037/03705654/03705654\\_2018-02-09\\_DATA.pdf](https://secure.conservation.ca.gov/WellRecord/037/03705654/03705654_2018-02-09_DATA.pdf).

Common methods of paint removal, such as sanding, scraping, and burning, create dust and the potential for lead to be absorbed into the body and pose a potential health risk. Since many of the structures located within the area were built prior to the federal regulations banning the use of LBPs, it is likely to exist in structures constructed prior to 1977.

- **Polychlorinated Biphenyls (PCBs)** are synthetic chemicals that were manufactured for use in various industrial and commercial applications—including oil in electrical and hydraulic equipment, and plasticizers in paints, plastics, and rubber products—because of their nonflammability, chemical stability, high boiling point, and electrical insulation properties. When released into the environment, PCBs persist for many years, accumulate and concentrate in organisms. The USEPA has classified PCBs as probable human carcinogens. In 1979, USEPA banned the use of PCBs in new electrical equipment and began a program to phase out PCB-containing equipment. Thus, older industrial areas in the vicinity of the proposed Project could contain PCBs.

#### 4.8.5 ADJUSTED BASELINE

This section assumes the Adjusted Baseline Environmental Setting as described in **Section 4.0: Environmental Impact Analysis, 4.0.5: Adjusted Baseline**. Related to hazards and hazardous materials, the changes associated with the Adjusted Baseline projects include excavation and construction activities within the HPSP area and the establishment of new uses.

For the purposes of the hazards and hazardous materials analysis, the Adjusted Baseline includes projects that will be constructed immediately northeast of the intersection of West Century Boulevard and South Prairie Avenue which are expected to include the use, storage, and disposal of hazardous materials. Construction of these improvements will not likely have any direct effect on the hazards and hazardous materials associated with the proposed Project, as the improvements being constructed would be expected to have only site-specific hazard issues.

As described in the SMP for the HPSP project and the Adjusted Baseline projects, following completion of construction, none of the sites for related projects included in the Adjusted Baseline will contain contaminants of potential concern that are above the criteria set in the SMP. Remediation has or will occur during grading and site preparation activities. The regulatory oversight required for these types of remediation activities would be required prior to completion of construction and would require that no potential for off-site migration could adversely affect the proposed Project. Also, the Adjusted Baseline projects will not be associated with substantive routine emissions of hazardous materials or wastes and any incidents such as accidental and upset conditions would likely be isolated and localized events. Therefore, while the number of hazardous materials being transported, stored, handled, and disposed of with these new land uses will increase, they would not substantively alter the environmental setting a beyond that existing under current existing conditions.

#### 4.8.6 THRESHOLDS OF SIGNIFICANCE

Criteria outlined in the CEQA Guidelines were used to determine Project impacts related to hazards and hazardous materials. As discussed in *Section 4.8.1*, three screening criteria related to hazards and hazardous materials of Appendix G of the CEQA Guidelines were not carried through for further analysis in this EIR. The Project would result in a significant impact if it would:

- Threshold HAZ-1: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.**
- Threshold HAZ-2: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.**
- Threshold HAZ-3: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.**

#### 4.8.7 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

The project includes ITC Design Guidelines (Design Guidelines) and Construction Commitment Program (CCP) as described in **Section 3.0: Project Description**. The CCP addresses temporary effects during construction of the Project. The Design Guidelines describe the design features of the proposed Project.

##### 4.8.7.1 Project Design Features

The Project includes the following features that limit potential exposure of hazards and hazardous materials during construction and operation of the proposed Project alignment and that manages the Project's construction activities that can interfere with emergency access:

##### PDF HAZ-1 Hazardous Materials Program

The following practices will be followed during construction to address the potential for encountering hazardous materials during construction of the Project.

- **Building Demolition Plan** – Prior to any demolition occurring, conduct an evaluation of all buildings built prior to 1980 to be demolished to identify the presence of asbestos containing materials (ACMs) and lead-based paint (LBP). Remediation shall be implemented in accordance with the recommendations of these evaluations to ensure that no ACMs or LBP remain present and to ensure ACMs and LBP are removed to levels established for public safety.
- **Hazardous Materials Contingency Plan** – Prior to construction, prepare a plan addressing the potential for discovery of unidentified underground storage tanks (USTs), hazardous materials, petroleum

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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 materials encountered during construction are removed to levels established for public safety.

- **Soil Management Plan** – After final construction plans are prepared showing the lateral and vertical extent of soil excavation during construction are prepared, prepare a Soil Management Plan to 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.
- **Health and Safety Plan** – Prior to construction, prepare a Health and Safety Plan to address the potential for exposure to any constituents of concern that may be encountered during construction.

#### PDF TRANS-2 Construction Staging & Traffic Control Program

A Construction Staging and Traffic Control Program will be developed by members of the Project Task Force (as defined in the Construction Commitment Program), subject to review and acceptance by the City and/or the JPA, and will 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 will 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

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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 should 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.

#### PDF TRANS-3 Preliminary Haul and Overload Routes

- Haul routes and overload/oversized vehicle routes are subject to review and approval by the City.
- To the extent possible, truck deliveries and hauling of bulk materials such as aggregate, bulk cement, dirt, etc. to the Project area, and hauling of material from the Project area, shall be scheduled during off-peak hours to avoid the peak commuter traffic periods on designated haul routes.
- Truck deliveries and hauling of dirt, aggregate, bulk cement, and all other materials and equipment, shall be on designated routes only (freeways and nonresidential streets).

#### PDF TRANS-4 Pedestrian Access Program

A Pedestrian Access Program will be developed by members of the Project Task Force (as defined in the Construction Commitment Program), subject to review and acceptance by the City and/or the JPA, and will adhere to the following principles:

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- 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 pedestrian 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 Federal 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 Inglewood Unified School District 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.

#### PDF AQ-1 Construction Air Quality Program

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

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inventory of all off-road construction equipment, equal to or greater than 50 horsepower that 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.

- 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.
- Require the use of electric or alternatively fueled (e.g., natural gas) sweepers with high-efficiency particulate air (HEPA) filters.
- 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.
- Contractors shall maintain and operate construction equipment to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications and documentation demonstrating proper maintenance, in accordance with the manufacturer's specifications, shall be maintained on site. Tampering with construction equipment to increase horsepower or to defeat emission control devices must be prohibited.
- Require in all applicable bid documents, purchase orders, and contracts of the requirement to notify all construction vendors, contractors, and/or haul truck operators that vehicle and construction equipment idling time will be limited to no longer than five minutes, consistent with the CARB's policy.

**Impact HAZ-1: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

#### Construction

Construction of the proposed Project would entail demolition, excavation, and grading activities which would disturb the existing physical landscape. As described in *Section 4.8.4: Existing Conditions*, areas near the proposed Project have been identified to contain former and current commercial operations and historic oil and gas exploration and production activities. Additionally, construction activities would involve the use of materials—including fuels, paints, oils, transmission fluids, solvents, and other acidic and alkaline solutions—that require special handling, transport, and disposal. These materials would be transported to and from the proposed Project for use during construction activities. The improper handling and transport of the materials could result in the accidental release of hazardous materials, thereby potentially exposing the public or the environment to hazardous materials.

#### Transportation of Construction Materials

As discussed in *Section 4.8.3.1*, the transport of hazardous materials is regulated by USDOT and Caltrans.<sup>61</sup> The transport regulations ensure safe transport of the regulated materials by addressing how hazardous materials are labeled, identifying approved transport routes, and including provisions that restrict containment during highway transportation of hazardous materials and wastes. Furthermore, the City has established “Designated Truck Routes.”<sup>62</sup> As shown in **Figure 4.12-4: Construction Haul/Delivery Routes and Staging Areas**, the primary delivery routes for the proposed Project include Florence Avenue, Manchester Boulevard, Prairie Avenue, and Century Boulevard. The Project would implement **PDF TRANS-3**, which requires construction vehicles to use designated truck routes during off-peak hours. Therefore, compliance with existing regulations and implementation of project features would reduce potential impacts related to the transportation of hazards and hazardous materials to less than significant.

#### Construction Materials

Common construction materials such as fuels, paints, cleaners, solvents, and welding materials would be used during construction. In general, aside from refueling needs for heavy equipment, the hazardous materials typically used on a construction site would be brought onto the site by the construction contractor, packaged in consumer quantities, and used in accordance with manufacturer recommendations. The overall quantities of these materials on the construction site at any one time would not result in large bulk amounts that, if spilled, could cause significant soil or groundwater contamination.

<sup>61</sup> Inglewood Municipal Code. Chapter 3 – Motor vehicles and traffic, Article 3 – Truck Route regulations.

<sup>62</sup> Inglewood Municipal Code. Chapter 3 – Motor vehicles and traffic, Article 3 – Truck Route regulations.

If a spill of hazardous materials on the construction sites were to occur, the spilled materials would be localized because of the relatively small quantities involved and it would be cleaned up in a timely manner in accordance with best management practices (BMPs) as specified in the contaminated soil contingency plan (**PDF HAZ-1**). Additionally, as the proposed Project would disturb more than an acre of land, it would be required to implement requirements of the NPDES General Construction Permit, including BMPs implemented as part of a Stormwater Pollution Prevention Plan (SWPPP). The BMPs would address the safe handling of hazardous materials. In the unlikely event of an inadvertent spill, response measures would contain the hazardous materials. The use of construction BMPs would minimize the potential adverse effects from accidental release of hazardous materials or wastes. These BMPs could include, but are not necessarily limited to, the following:

- Establishment of a dedicated area for fuel storage and refueling activities that includes secondary containment protection measures and spill control supplies;
- Requirements to follow manufacturer’s recommendations on use, storage and disposal of chemical products used in construction;
- Avoidance of overtopping construction equipment fuel gas tanks;
- Proper containment and removal of grease and oils during routine maintenance of construction equipment; or
- Proper disposal of discarded containers of fuels and other chemicals.

As described above, refueling activities of heavy equipment would be conducted in a dedicated and controlled area. Secondary containment and protective barriers would also be implemented to minimize potential hazards that might occur. Given the required protective measures (i.e., BMPs) and the quantities of hazardous materials typical for construction, as well as implementation of **PDF HAZ-1**, the potential of exposure of hazardous materials to construction workers, the public, or contamination to soil and/or groundwater would be reduced to acceptable standards, and potential impacts related to construction materials would be less than significant.

#### Pre-1980 Structures and Improvements

Construction of the proposed Project would involve the demolition of existing buildings at the commercial center at the northeast corner of Market Street and Regent Avenue, 150 S. Market Street, the retail commercial buildings at 500 E. Manchester Boulevard and 923 and 1035 S. Prairie Avenue. Due to their age, some of these buildings may have the potential to release hazardous materials, such as ACMs, LBP, and other potentially hazardous building materials, including PCBs, mercury, or chlorofluorocarbons found in fluorescent lighting and electrical switches. The release of these hazardous materials into the

environment may expose construction workers and members of the public in the vicinity of the demolition activities to hazardous materials.

Preparation and implementation of the Building Demolition Plan as described in **PDF HAZ-1** would include an evaluation of all buildings to be demolished prior to demolition activities. The Building Demolition Plan would gauge the likelihood and levels of possible ACMs, LBP, PCBs, and other hazardous materials that could be encountered and would identify the approach to remove and dispose of the materials in compliance with applicable rules and regulations, including SCAQMD Rule 1403<sup>63</sup> and Cal/OSHA regulations regarding LBP, ACMs, PCBs, mercury, or chlorofluorocarbons, as listed above in *Section 4.8.3: Regulatory Framework*.

SCAQMD Rule 1403 specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of ACM.<sup>64</sup> The rule's requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and cleanup procedures, and storage, disposal, and landfilling requirements for ACWM. Under the Lead Renovation, Repair, and Painting Rule, contractors who renovate or partially demolish pre-1978 residential buildings must be lead-safe certified by USEPA and use lead-safe practices. Lead abatement activities are regulated by the USEPA; lead abatement companies are governed by the USEPA and the USEPA requires individuals and firms that conduct lead-based paint activities, including abatement, to be licensed.

Implementation of the Building Demolition Plan (**PDF HAZ-1**) and compliance with relevant federal, state, and local regulations and requirements for identified hazardous materials would reduce potentially significant impacts related to exposing hazards to the public or the environment.

#### **Underground Tanks and Soil Hazards**

Construction of the proposed Project would involve excavation, loading, and transportation of soils and USTs that may contain hazardous materials. As shown in **Table 4.8-2** and further discussed below, the proposed improvements would be developed on properties listed on Government databases for hazardous materials.

#### **Market Street/Florence Avenue Station**

This proposed station would be located on the even number addresses of 200—270 N. Market Street and 300—330 E. Florence Avenue. The property is currently developed with a strip mall and surface parking.

<sup>63</sup> Rule 1403 – Asbestos Emissions from Demolition/Renovations Activities, AQMD, 2007, <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.

<sup>64</sup> Rule 1403 – Asbestos Emissions from Demolition/Renovations Activities, AQMD, 2007, <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.

Current and historic uses at the property have required permits for the use of various chemicals, including petroleum hydrocarbons, dry-cleaning solvents to alkaline and acidic solutions, other inorganic solid waste, pharmaceutical waste, ignitable waste, chromium, mercury, selenium, m-cresol, nicotine, 2-propanone, acetone, cyclohexane, lindane, selenium sulfide, and other organic chemicals. **PDF HAZ-1** requires preparation of a Soil Management Plan, which will determine whether there are recognized environmental conditions on the property caused by the current and historic uses of hazardous materials at the property and if there is possible presence of contaminated soil. If required, the Soil Management Plan will require implementation of a Contaminated Soil Contingency Plan that will include procedures for segregation, sampling, and chemical analysis of the soil. Contaminated soil will be profiled for disposal and will be transported to an appropriate waste or recycling facility licensed to accept and treat the type of waste indicated by the profiling process. Compliance with the Soil Management Plan, Contaminated Soil Contingency Plan, and Health and Safety Plan (**PDF HAZ-1**) will ensure that potential exposure of hazardous materials to construction worker and the public are limited and that their removal is consistent with existing regulations enforced by the Cal-OSHA, DTSC, RWQCB, SCAQMD, and LACoFD.

Additionally, the landing leg of the proposed elevated passenger walkway for the Market Street/Florence Avenue station, on the north side of Florence Avenue would be developed on property with the addresses of 317 and 333 E. Florence Avenue. Both addresses are associated with USTs, including two LUST cases (RWQCB Case Number R-60173 and RWQCB Case Number R-37884) that have been closed. According to the SWRQCB, the 317 E. Florence address, which is the Metro K Line Downtown Inglewood Station, also operate one UST. Although this UST is unlikely to be within the footprint of the development area of the proposed elevated passenger walkway, the Soil Management Plan and Hazardous Materials Contingency Plan (**PDF HAZ-1**) will determine this possibility and include recommendations for its safe removal and/or relocation, if needed and in accordance with applicable regulations and guidelines to ensure that potential exposure of hazards to the construction workers, the public, and environment is limited.

#### **Maintenance and Storage Facility**

The proposed MSF would be constructed on property associated with the 500 and 510 E. Manchester Boulevard addresses. The property is currently developed with a grocery store, gas station, and surface parking. The property contains at least one UST (facility ID LACoFA0033888) related to operations of the gas station; it is also associated with a previous LUST (RWQCB Case Number I-09429), which was closed by RWQCB on July 19, 1996. All USTs on this property would be decommissioned and removed as part of the proposed Project and would be addressed in the Hazardous Materials Contingency Plan and Health and Safety Plan (**PDF HAZ-1**). Closure of the gas station and removal of the USTs, related piping, and/or dispensers would be subject to the requirements of LACoFD and RWQCB. Any potential contamination would be remediated in accordance with the appropriate regulatory requirements, including conditions directed on the Closure Permit as well as meet the requirements of California Health and Safety Code

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Section 25298, Underground Storage of Hazardous Substances, California Code of Regulations Title 23, Sections 2670 through 2672, Underground Storage Tank Closure Requirements, and the Los Angeles County Department of Public Works, Environmental Programs Division, Underground Storage Tank Program: Closure.<sup>65</sup> Therefore, construction of the proposed MSF would not result in an accidental release of hazardous materials into the environment.

##### **Prairie Avenue Guideway and Roadway Improvements**

Towards the Prairie Avenue/Hardy Street Station—on the west side of Prairie Avenue—the proposed guideway would be constructed on and over private property, including 923 S. Prairie Avenue, which is followed by a CalEPA database for the storage of chemicals, related to the operation of a T-Mobile cell tower. No violations have been identified on this property. Nevertheless, the Soil Management Plan (**PDF HAZ-1**) will identify potential concerns, including the potential removal of the cell phone tower and chemicals, if required, as a part of the proposed Project.

The proposed expansion of the Prairie Avenue right-of-way, between Manchester Boulevard and Hardy Street would encroach onto 3900 W. Manchester Boulevard and 600 S. Prairie Avenue, which are listed on government databases for USTs containing gasoline, MTBE, and other fuels. With recent developments in this area (i.e., the Forum and SoFi Stadium and Entertainment District), any potential hazards identified have likely been removed and/or remediated. The Soil Management Plan and Health and Safety Plan (**PDF HAZ-1**) will determine the extent of hazardous soils, if any, and ensure that any potential exposure of the hazards from soil disturbance to construction workers, the public, and environment would be limited.

##### **Prairie Avenue/Hardy Street Station**

The property proposed for the Prairie Avenue/Hardy Street Station is currently developed with a strip mall and surface parking. Addresses associated with this property include the odd numbers of 1035—1051 S. Prairie Avenue. One of the addresses is associated with dry cleaning solvents. Implementation of **PDF HAZ-1**, which requires preparation of the Soil Management Plan, Contaminated Soil Contingency Plan, if warranted, and Health and Safety Plan will determine the extent of potential hazardous soils and their remediation/removal if necessary. Compliance with **PDF HAZ-1** will ensure that soil disturbance would be compliant with government regulations and reduce the potential exposure of hazards to construction workers, the public, and environment.

##### **Properties Adjacent to the Proposed Inglewood Transit Connector Project**

As listed in **Table 4.8-3**, numerous properties adjacent and near the proposed Project alignment have been identified on Government databases for hazardous materials. Depending on the current and historic uses

<sup>65</sup> Los Angeles County Department of Public Works, Environmental Programs Division, *Underground Storage Tank Program: Closure*, accessed June 30, 2020, <https://pw.lacounty.gov/epd/UST/closure.cfm>.

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of the hazardous materials and operations at these properties, environmental conditions at these properties may exist and affect the soils that would be disturbed by Project implementation. The Soil Management Plan and Health and Safety Plan that would be prepared under **PDF HAZ-1** for each phase of the proposed Project will consider the adjoining properties' potentially hazardous soil conditions. If required, a contaminated soil contingency plan will be implemented to ensure the safe handling and removal of hazardous soils and to limit environmental exposure to construction workers and the public.

##### **Summary of Impacts**

Construction of the proposed Project would not result in the accidental or inadvertent release of hazardous materials into the environment. The proposed Project includes the CCP, which is implemented as a project design feature (**PDF HAZ-1**) that requires the preparation and implementation of Building Demolition Plans, Hazardous Materials Contingency Plans, Soil Management Plans, and Health and Safety Plans that will outline hazards and hazardous materials within the Project area and identify how they are to be handled, removed, remediated, transported, and/or disposed of in a safe manner that would comply with applicable regulations, guidelines, and BMPs. Accordingly, potential exposure of hazards and hazardous materials to construction workers, the public, and the environment would be reduced to acceptable standards, and reasonably foreseeable upsets and accident conditions involving hazards and hazardous materials during construction would be less than significant.

##### **Operation**

Operation of the proposed Project would require the storage and handling of various types of regulated chemicals that are considered hazardous:

- **Cleaning and Building Maintenance Supplies.** Maintenance of each of the three stations and the MSF would require use and storage of janitorial cleaning supplies, paints and thinners, and pesticides for landscaping.
- **Train and Vehicle Fleet Maintenance Supplies.** The MSF would use and store chemicals for the purpose of maintaining Automated Transit System (ATS) trains and vehicle fleet. These may include fuel, solvents, oil, lubricants, transmission fluid, coolants, and absorbents.
- **Power Distribution System (PDS) Substations and Backup Power Generators.** The MSF and Prairie Avenue/Hardy Street Station would each operate a PDS substation and power generator. Various chemicals would be used and stored, including but not limited to dielectric fluid, transformer oil, insulating oils, sulfuric acid, and sulfur hexafluoride in order to insulate and cool electrical conductors and operate the PDS substations. Diesel fuel would also be stored for the operation of the power generators.

The use and storage of these chemicals have the potential to be released into the environment if they are not properly handled and stored in accordance with the manufacturers' instructions and applicable

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federal, State, and local regulations, including those set forth by the federal- and Cal-OSHA, DTSC, as well as a facility-specific Hazardous Materials Business Plan (HMBP) that would be prepared for the proposed Inglewood Transit Connector project, administered by the LACoFD. The HMBP would address hazards related to the operations of the proposed Project, such as fires, explosions, or an unplanned release of hazardous substances into air, soil, or surface water.

The HMBPs would inventory the hazardous materials used and stored at each of the three stations and MSF and include an emergency response plan, including spill response measures to ensure that in the event that a release occurs, protocols would be implemented to contain and control the release in a manner that is protective of human health and the environment. The LACoFD would be required to review plans and ensure that hazardous substances used for the proposed Project are properly stored and the accident response plan is in place. The LACoFD would be responsible for inspecting and monitoring the use and storage of the hazardous materials. Material safety data sheets would be obtained from chemical manufacturers and made available to employees. Chemical containers would be required to be properly labeled. The proposed Project would be required to develop and maintain a written hazard communication program and develop and implement programs to train employees about hazardous materials.

Project operations may require the transportation of hazardous materials to and from stations and the MSF. The transport of these materials is 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.

Compliance with federal, State, and local laws and regulations relating to transport, storage, disposal, and handling of hazardous materials during Project operations would reduce the potential for accidental release or upset of hazards and hazardous materials in the environment reduce potential health risks. Therefore, operational impacts are less than significant.

#### Summary of Impacts

Operation of the proposed Project would require the use and storage of various types of hazardous materials at the proposed stations and MSF site. If not handled and stored in accordance with the manufacturers' instructions and applicable federal, State, and local regulations, the use and storage of the hazardous materials would have the potential to be released into the environment. The proposed Project would comply with federal- and Cal-OSHA, DTSC, the project's HMBP, administered by the LACoFD, as well as USDOT and Caltrans transportation requirements for hazardous materials. Accordingly, risks related to the use and storage of hazardous materials would be reduced to acceptable standards, and operational impacts would be less than significant.

#### 4.8 Hazards and Hazardous Materials

#### Mitigation Measures

##### Construction

No mitigation is required.

##### Operation

No mitigation is required.

#### Level of Significance after Mitigation

Impacts would be less than significant.

**Impact HAZ-2: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

Section 4.8.4 lists schools and childcare facilities within one-quarter mile (1,320 feet) of the proposed Project alignment.

#### Construction

As discussed in **Impact HAZ-1**, construction of the proposed Project would involve the use, handling, transport, and disposal of hazardous materials that if improperly handled could result in an accidental release and potential exposure of hazards to the public, including schools adjacent to the proposed ATS system and along designated truck routes.

#### Handling of Construction Materials

Hazardous materials used at construction sites include fuels, paints, oils, transmission fluids, solvents, acidic and alkaline solutions, and welding materials. The materials would be brought onto the site by the construction contractor, packaged in consumer quantities, and used in accordance with manufacturer recommendations. The quantities of the materials at any one time would not result in large bulk amounts that, if spilled, would cause significant contamination or exposure to the public and schools. An accidental spill would be localized and contained due to the relatively small quantities involved and cleaned up in a timely manner, required by existing regulations, including OSHA. Removal procedures would be detailed in the contaminated soil contingency plan that is required for all construction activities and incorporated in the proposed Project as **PDF HAZ-1, Hazardous Materials Program**. Construction best management practices, included in the proposed Project's Stormwater Pollution Prevention Plan, would limit pollutants entering to the stormwater as well as exposure of potential hazards and hazardous materials to the public, including schools. Given the required protective measures, limited quantities of hazardous materials used

at any one time at the construction site, and implementation of PDF HAZ-1, potential impacts related to the exposure of hazardous materials at nearby schools would be less than significant.

#### **Transportation of Construction Materials**

Construction materials would be transported along designated truck routes approved by the City (**PDF TRANS-3**). The routes would be along freeways and major thoroughfares, including Florence Avenue, Manchester Boulevard, Prairie Avenue, and Century Boulevard and would avoid residential streets. There are, however, existing schools along these routes. The transportation of hazardous materials is regulated by the Hazardous Materials Transportation Act, which is administered by the USDOT and Caltrans.<sup>66</sup> All truck drivers carrying hazardous materials to and from the construction sites—including materials for construction of the proposed ATS system and demolished existing building materials, underground improvements, and any contaminated soils—are required to have a commercial driver license with a hazardous materials (HazMat) endorsement; the HazMat endorsement allows truck drivers to transport hazardous material legally. Truck drivers would be trained for safety and to become familiar with hazardous materials requirements and complying with applicable packaging, labeling, and shipping regulations.<sup>67</sup> **PDF TRANS-3** also requires truck deliveries and the hauling of bulk construction-related materials to and from the Project area to be scheduled during off-peak hours. The morning peak hour would coincide with morning drop-off activities at schools. Accordingly, potential impacts related to the transportation of hazardous materials and school operations would be further limited with **PDF TRANS-3**. **PDF TRANS-4** would further minimize pedestrian exposure to hazardous materials by maintaining safe routes to schools. **PDF TRANS-4** requires the maintenance of safe and accessible sidewalks and crosswalks during construction and installation of wayfinding signs to ensure adequate levels of service of City-maintained pedestrian facilities. It also requires dedicated pedestrian barriers to protect pedestrians from construction-related debris, dust, and noise, and the use of crossing guards to address pedestrian safety and potential hazards related to construction activities. Therefore, compliance with existing regulations and the implementation of **PDF TRANS-3** and **PDF TRANS-4** would reduce potential impacts related to the transportation of construction and hazardous materials near schools to less than significant.

#### **Construction Emissions**

**Air Emissions.** Project construction would generate potentially hazardous air emissions. Air quality impacts are analyzed in **Section 4.2: Air Quality**. Specifically, a Health Risk Assessment was conducted to determine if Toxic Air Contaminants (TAC) from Project construction would significantly contribute to cancer risk at sensitive receptors within one-quarter mile, including schools and daycare centers. As discussed under **Impact AQ-3**, the HRA found that the proposed Project's construction-related emissions

<sup>66</sup> 49 USC Section 1801 et seq., (1975).

<sup>67</sup> California Vehicle Code Division 13, Chapter 5, Article 1, Section 31303–31309

with mitigation (i.e., **PDF AQ-1**) would reduce health risks caused by off-road construction equipment to acceptable standards, and impacts are less than significant. Implementation of **PDF AQ-1** would mitigate regional air quality impacts and health risks at the sensitive receptors, including schools, to less than significant. **PDF AQ-1** requires construction equipment to meet Tier 4 emissions standards. Tier 4 compliant engines significantly reduce emissions of particulate matter (PM) and oxides of nitrogen (NOx) to near zero levels.<sup>68</sup> Construction equipment must also be outfitted with the best available control technology, including Level 3 diesel particulate filters, which further reduces particulate matter emissions by at least 85 percent. **PDF AQ-1** requires construction equipment and vehicles to be nondiesel and/or at a minimum meet CARB's 2010 engine emissions standards (0.01 g/hp-hour of particulate matter and 0.20 g/hp-hour of NOx emissions). Sweepers must have high-efficiency particulate air (HEPA) filters installed. To the extent feasible, equipment will be pole powered in lieu of generators. Additionally, if stationary equipment cannot be enclosed within acoustical barriers, the equipment must be muffled and, whenever possible, located at least 100 feet from sensitive land uses, including schools. Stationary construction equipment, such as diesel- that must be operated continuously must be placed at least 100 feet from air quality sensitive land uses, such as schools and daycare facilities, whenever possible. As demonstrated in **Tables 4.2-21** and **4.2-22**, the combined use of mitigating project features of **PDF AQ-1** reduces potentially significant health risks and impacts caused by construction emissions to less-than-significant levels.

**Noise and Vibration.** Construction activities would generate noise and vibration that could affect schools proximate to the proposed ATS system and along truck routes. Noise and vibration impacts are analyzed in **Section 4.10: Noise and Vibration**. **Impact NOI-1** includes noise modeling and impact analysis conducted at sensitive receptors near the proposed ATS system. Kelso Elementary School and a daycare facility, which are closest to the Project, are identified as receptors. The modeling conducted showed that construction noise levels at both sites would not exceed established thresholds, and impacts would be less than significant. Construction traffic noise was also assessed. As discussed in **Impact NOI-1**, delivery of construction materials would occur mainly during the night shift; therefore, construction traffic noise would have no impact on school operations.

Potential vibration impacts on buildings and human annoyance is discussed in **Impact NOI-2**. As documented in **Table 4.10-25**, heavy construction equipment would not damage school buildings, which would create a hazardous condition. However, due to the close proximity of the construction area, as shown in **Table 4.10-26** (listed as Site 3), pile driving activities could create vibration levels considered to be an annoyance at Kelso Elementary School. **PDF NOISE-1**, Construction Noise Control Plan, and **PDF NOISE-2**, Construction Vibration Reduction Plan, would require coordination with Inglewood Unified

<sup>68</sup> US EPA. Regulations for Emissions from Heavy Equipment with Compression-Ignition (Diesel) Engines. Site Accessed 2021, September 29. <https://www.epa.gov/regulations-emissions-vehicles-and-engines/regulations-emissions-heavy-equipment-compression>

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School District administrators to minimize disruptive noise and vibration effects, and limit the location of pile driving to 310 feet of off-site vibration sensitive receptors, such as Kelso Elementary School. Compliance with **PDF NOISE-1** and **PDF NOISE-2** would reduce potential health hazards related to short-term construction noise and vibration effects at nearby schools to acceptable standards; impacts would be less than significant.

#### **Summary of Construction Impacts**

With compliance with applicable local, State, and federal regulations governing the transport, handling, and disposal of hazardous materials and the implementation of the proposed Project's CCP, Project construction impacts related to the handling of hazardous materials and release of emissions at schools located within one-quarter mile of the proposed Project would be less than significant.

#### **Operation**

##### **Hazardous Materials**

As discussed in **Impact HAZ-1**, the operation and maintenance of the proposed ATS guideway, stations, MSF, PDS substations, and emergency generators would require the storage and handling of chemicals that have the potential to be released into the environment.

- The stations would include use of materials typical to a commercial setting such as cleaning solutions, solvents, pesticides for landscaping, and painting supplies. Compliance with federal, State, and local laws and regulations relating to transport, storage, disposal, and handling of hazardous materials would minimize any potential for accidental release or upset of hazardous materials during station operation. Additionally, the proposed Project would comply with planning and emergency response regulations pertaining to the presence of such materials during operation.
- Operations of the MSF and Prairie Avenue/Hardy Street Station would be subject to the requirements of programs administered by the LACoFD for storage of all hazardous materials on site, including diesel fuel for the emergency generators, which would be required to adhere to a facility-specific HMBP.
- The MSF would require the use of equipment, tools, and materials for maintenance activities; these may also require the use of various materials and substances that would be considered hazardous. The PDS substations at the MSF and Prairie Avenue/Hardy Street Station would use and store bulk quantities of hazardous materials—such as fuel, solvents, oil, transmission fluid, paints, and other chemicals—that would have the potential to be released into the environment if not properly handled and stored. The proposed Project would comply with existing regulations governing the storage and handling of such chemicals, and applicable regulations to responding to accidental release of such chemicals.

#### 4.8 Hazards and Hazardous Materials

Therefore, the potential exposure of hazardous materials to the environment and sensitive receptors, including nearby schools, would be reduced to acceptable standards, and impacts would be less than significant.

##### **Hazardous Emissions**

Air emissions that would be generated by operation of the proposed ATS System are analyzed in **Section 4.2**. In general, the proposed Project would have an overall beneficial effect on regional and local air quality. The Project would result in a significant reduction in vehicle emissions. Coupled with the removal of several existing land uses that generate emissions, the proposed Project would result in net negative emissions. Furthermore, the ATS trains and guideway would be powered by electricity, which would not generate emissions associated with fuel combustion. Therefore, Project operations would not result in the generation of hazardous air emissions that would impact schools.

##### **Rail Safety Hazards**

Title 5 California Code of Regulations Section 14010(d) requires the preparation of a Rail Safety Study (RSS) when a proposed new school site is within 1,500 feet of an existing railroad track easement. Although not applicable to the proposed Project, at the request of the IUSD, the City prepared an RSS for the potential derailment of the proposed 1.6-mile elevated ATS trains. For analytical purposes, the RSS uses Kelso Elementary School as the primary site as it is nearest to the proposed Project alignment; potential impacts to other schools would be less as they are farther away.

A quantitative probability (annual frequency) of a derailment accident was determined for the ATS trains using the portion of the ITC Guideway within 1,500 feet of Kelso Elementary School. The determination of the likelihood of derailment is based on a comparison of the ATS train travel characteristics with the characteristics of similar systems in the Federal Railroad Association (FRA) railroad accident statistics.

The probabilities of a train accident and a train derailment are computed considering the following findings:

- The trains would operate on a single main line track.
- The trains will run on an elevated guideway, which eliminates potential conflicts with pedestrian and vehicular traffic that could affect students traveling to and from schools.
- The frequency of ATS trains and speed (maximum up to 50 mph) are similar to other transit lines operated by Metro in the region.
- The ATS trains would be strictly used for transporting passengers; there will not be any other cargo.
- The ATS trains would not transport hazardous materials, such as fuel, as it would be electrically powered.

#### 4.8 Hazards and Hazardous Materials

Accordingly, the probability of an accident for each train mile in one direction is 1.44E-04 (or 0.000144) or 2.88E-04 (or 0.000288) in both directions, which is extremely low. The annual probability of the occurrence of a train derailment within 1,500 feet of Kelso Elementary School and during school operating hours (7 AM to 4 PM) was determined to be roughly zero (0.00E+0.0). Therefore, potential risk related to derailment of the proposed ATS trains is less than significant. (Additional discussion on safety and security programs for fixed guideway transit systems is provided below in the Operations discussion of **Impact HAZ-3**.)

#### Summary of Operational Impacts

**Hazardous Materials.** The proposed Project would comply with federal, State, and local laws and regulations relating to the transport, storage, disposal, and handling of hazardous materials during Project construction and operation. The use and storage of hazardous materials would comply with a project-specific HMBP, which would be administered by LACoFD. Therefore, potential impacts cause by hazardous materials at schools within one-quarter mile would be less than significant.

**Hazardous Emissions.** The Project would generate construction emissions; however, the emissions would not significantly contribute to health risks or acute impacts at nearby schools. Furthermore, mitigation measures required to reduce the Project's regional air quality impacts would also reduce localized air quality impacts, including at school sites. With the reduction of vehicle trips in the Project vicinity, removal of commercial uses for development of the proposed stations, and the operation of the proposed electric powered ATS, the proposed Project would result in an overall beneficial reduction of toxic emissions within a quarter mile of the proposed Project, including at school sites. Therefore, impacts related to hazardous emissions is less than significant.

**Rail Safety Operations.** An RSS was prepared for Kelso Elementary School, as it is the closest school to the proposed guideway. The RSS determined that the likelihood of a train accident in one direction is 1.44E-04 (or 0.000144) or 2.88E-04 (or 0.000288) in both directions. The annual probability of a derailment for the ATS railcars is roughly zero (0.00E+0.0) during school hours.

#### Mitigation Measures

##### Construction

No mitigation is required.

##### Operation

No mitigation is required.

#### 4.8 Hazards and Hazardous Materials

#### Level of Significance after Mitigation

Impacts would be less than significant.

#### Impact HAZ-3: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

As described in *Section 4.8.3.3*, the proposed Project would be constructed in accordance with current design standards and building codes, which is consistent with the MHMP. Implementation of these standards and codes would minimize the loss of life and property from natural hazard events and protect public health and safety. The proposed Project would not interfere or impair with the City's ability to increase public awareness or make any improvements to emergency services and warning systems.

#### Construction

The proposed Project is located largely within public rights-of-way. For this reason, construction activities may cause the temporary closure of travel lanes, roadways segments, and sidewalks along the elevated guideway and stations within the street rights-of-way.

The City of Inglewood Public Works Department, Transportation Division operates and maintains the following:

- ITS traffic management center and intersection monitoring cameras
- Traffic signals and stop signs
- Intersection design and roadway alignments
- Public parking structures and lots
- Parking meters
- Parking permit districts
- Crosswalks and roadway striping
- Street lighting
- Street and traffic signs
- Street closures and barricades

The City Department of Public Works Engineering Division is responsible for issuing permits related to street closures for construction activities including Encroachment and Excavation Permits. An encroachment or excavation permit is required for all construction work within or related to the use of any public street right-of way.

### Temporary Closures of Roadways and Sidewalks

Construction of the proposed stations, parking lots, and MSF would mainly occur within the properties affected. Perimeter improvements at these facilities, such as new driveways and sidewalk improvements, may require the temporary closure of lanes and sidewalks adjacent to the improvement area. Construction of the proposed ATS guideway and Prairie Avenue roadway shift would predominantly occur within the rights-of-way and as discussed in *Section 3.7: Construction*, would result in temporary street and/or lane closures. The closure of streets would be confined to the construction phase of the proposed Project and as required by **PDF TRANS-2**, Construction Staging and Traffic Control Program, would typically occur during off-peak hours. Closures would be temporary in nature and would not last the entirety of the Project construction phase. However, the phased construction duration of the proposed Project would be approximately four years, which could adversely affect the existing emergency access routes and services.

Specifically, the proposed Project could restrict access to streets that are designated as evacuation routes in the Safety Element of the City's General Plan, including Florence Avenue, Prairie Avenue and Manchester Boulevard. Street closures would interfere with emergency response or evacuation plans involving the use of these streets, even though the closures would be conducted in accordance with the City's permitting process. Adjacent collector/local streets on either side of Florence Avenue, Prairie Avenue and Manchester Boulevard could be used during street or lane closures.

The CCP will require all potential street and/or lane closures during construction to be reviewed and approved by the City and shall include measures to minimize the degree and duration of the closures.

The Construction Staging and Traffic Control Plan would include detour routes and would require coordination with the City, police, and fire services department regarding maintenance of emergency access and response times.

Preparation and implementation of the Construction Staging and Traffic Control Plan would ensure that adequate access or appropriate detour routes are provided along Florence Avenue, Prairie Avenue, and Market Street. Impacts would be less than significant.

### Operation

The proposed Project would not interfere or impair with the City's ability to increase public awareness or make any improvements to emergency services and warning systems during operations.

### ATS Guideway

The proposed Project would operate in conformance with established safety requirements. The American Society of Civil Engineers (ASCE) Standard 21, Part 1 – Automated People Mover Standards<sup>69</sup> which addresses safety and performance requirements that apply to proposed Project. ASCE published a safety and security standard that included requirements that address federal and State regulations for independent safety oversight agencies. Safety and security programs should also adhere to ASCE 21, Part 4 (ASCE 21.4-08) – Automated People Mover Standards—Part 4: Security Emergency Preparedness System Verification and Demonstration Operations, Maintenance, and Training Operational Monitoring.<sup>70</sup>

Safety oversight of fixed guideway transit systems is required at the State government level under the Federal Transit Administration, Part 659, Rail Fixed Guideway Systems – State Safety Oversight requirements when there is a similar transit system operating within the State.<sup>71</sup> The proposed Project's safety and security programs would be subject to the requirements the of CPUC and State Safety Oversight of Fixed Guideway Transit Systems. In addition, the operation of the proposed Project would be required to adhere to all State and local safety requirements including those of the City's fire and police departments. With adherence to the federal, State, and local safety requirements, the proposed Project would not conflict with the requirements of an emergency response plan or emergency evacuation plan.

### Roadway Reconfiguration and Restriping

Roadway configuration and striping for the proposed Project are shown in **Figures 3.0-10 to 3.0-24: Striping Plans**, and **Figures 3.0-25 to 3.0-32: Cross-sections**. Proposed improvements would be designed consistent with standards established in the City's Circulation Element.<sup>72</sup> The City's Department of Public Works, Transportation Division would review and approve the final roadway configuration and restriping improvements.<sup>73</sup> Therefore, operation of the reconfigured and restriped roadways would not interfere with adopted emergency response plan or emergency evacuation and this impact is less than significant.

- 69 American Society of Civil Engineers (ASCE). Standard 21 – Automated People Mover Standards. Part 1, Section 3 (ASCE 21-05). <https://ascelibrary.org/doi/book/10.1061/9780784408735>
- 70 American Society of Civil Engineers (ASCE). Standard 21, Part 4 (ASCE 21.4-08) - Automated People Mover Standards—Part 4: Security Emergency Preparedness System Verification and Demonstration Operations, Maintenance, and Training Operational Monitoring. <https://standards.globalspec.com/std/1147223/ASCE%2021.4-08>
- 71 Code of Federal Regulations (CFR), Title 49. Transportation. Subtitle B. Other Regulations Relating to Transportation, Chapter VI. Federal Transit Administration, Part 659, Rail Fixed Guideway Systems; State Safety Oversight.
- 72 Inglewood General Plan, Circulation Element. 1992, December 15. <https://www.cityofinglewood.org/DocumentCenter/View/128/Circulation-Element-1992>.
- 73 City of Inglewood, Transportation and Traffic. Accessed: 2021, October 28. <https://www.cityofinglewood.org/451/Transportation-Traffic>

**Mitigation Measures**

**Construction**

No mitigation is required.

**Operation**

No mitigation is required.

**Level of Significance after Mitigation**

**Construction**

Impacts would be less than significant.

**Operation**

Impacts would be less than significant.

**4.8.8 CUMULATIVE IMPACTS**

Hazardous materials and hazard impacts are generally localized to specific sites and do not combine with one another in a way to create a greater or more severe hazard. Because of the relative infrequencies and the variances in timing, the geographic scope for cumulative hazards and hazardous materials impacts varies based on the hazard and the significance threshold being analyzed. Impacts relative to hazardous materials usually depend on the nature and extent of the hazardous materials release, and existing and future soil and groundwater conditions. Hazardous materials incidents tend to be limited to a smaller more localized area surrounding the immediate location and extent of a release and could only be cumulative if two or more hazardous material releases overlapped spatially and contemporaneously.

The timeframe during which the proposed Project could contribute to cumulative hazards and hazardous materials effects includes the construction and operations phases. Similar to the geographic limitations discussed previously, it should be noted that impacts relative to hazardous materials are generally time-specific. Hazardous material events could only be cumulative if two or more hazardous material releases occurred at overlapping times.

As discussed in **Section 3.0: Project Description**, the City is considering building a parking structure on the City’s Inglewood Transit Facility (ITF) site located on the southeast corner of Prairie Avenue and Arbor Vitae Street. This parking structure would provide additional public parking near event venues in the LASED and for the IBEC. The ITF site is currently improved as a surface parking lot and bus transit facility. This potential parking structure would provide up to 2,500 parking spaces in a six-level building. Although this proposed

parking facility is not proposed as part of the Project, it is considered a related project for the purposes of assessing potential cumulative impacts.

The 2009 EIR for the Hollywood Park Specific Plan (HPSP) project evaluated the impacts of developing the City’s four-acre ITF site with respect to potential hazardous materials and risk of upset. As described in the 2009 EIR, the City’s ITF has undergone numerous site assessment evaluations over the past two decades; those which are relevant to the proposed Project are shown in **Table 4.8-4: ITF Site-Specific Investigations**. A summary of the investigative history associated with the City’s Civic Center site is provided below.

**Table 4.8-4  
ITF Site-Specific Investigations**

Investigation	Prepared By	Date
Phase I Environmental Site Assessment and Limited Compliance Assessment	ENVIRON International Corporation	April 11, 2005
Soil Management Plan	Erlar & Kalinowski, Inc.	July 3, 2007
Technical Report and Work Plan	Erlar & Kalinowski, Inc.	April 24, 2008
Field Portable X-Ray Fluorescence Spectrometry for In-Situ Screening of Arsenic in Soil	Erlar & Kalinowski, Inc.	February 26, 2015

Source: City of Inglewood, Final Environmental Impact Report for the Hollywood Park Redevelopment Project, June 3, 2009.

A Soil Management Plan (SMP) summarizing prior screening-level subsurface investigations was prepared in July 2007 and submitted and approved by the RWQCB, to address localized areas found to contain or suspected to contain chemicals of potential concern (COPCs) on the Hollywood Park property including the City’s Civic Center site where the proposed Project may locate a PDS substation either above or below grade. The SMP includes soil and soil gas COPCs criteria and soil management and construction risk management protocols to be implemented during planned redevelopment of the property, including soil reuse and waste disposal classification protocols.

Soil sampling revealed arsenic in shallow soil at the ITF site. All shallow arsenic-contaminated soil has been removed from the City’s Civic Center site as of the summer of 2020. The remaining soil on the site is below the Property-specific Soil Criteria (PSC) requirement and removal is deemed complete; no further action is recommended. The RWQCB required no further action, and the site was developed by the City with as a surface parking lot and bus transfer facility.

The proposed Project in conjunction with other cumulative projects would include the use, storage, and disposal of varying quantities of hazardous materials. The proposed Project does not include any substantive emissions of hazardous materials that would be associated with industrial land uses (e.g., manufacturing, chemical processing, handling of bulk quantities of hazardous materials or wastes). Just as

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with the proposed Project, all commercial uses/businesses would be required to submit business information and hazardous materials inventory forms to the LACoFD and/or appropriate jurisdiction having responsibility, such as the California Environmental Reporting System. All hazardous materials are required to be stored and handled according to the manufacturer's instructions and local, State, and federal regulations. With adherence to existing regulatory requirements, releases from routine transport, use, or disposal of hazardous materials would be minimized, and in the unlikely event of a release, would be localized in extent.

As discussed previously, adherence to the regulatory requirements would ensure that incidents at the proposed Project and other cumulative projects are infrequent, and thus unlikely to occur simultaneously in a way that could result in the public or environment being exposed to multiple releases of hazardous materials. For the aforementioned reasons, the proposed Project, in conjunction with other cumulative projects, would not create a significant cumulative hazard impact to the public or the environment through the routine transport, use, or disposal of hazardous materials.

A cumulative impact related to transport, use, or disposal of hazardous materials could occur if there were hazards releases in the vicinity and at the same time as a release associated with the construction or operation of the proposed Project. For the purposes of this analysis, the geographic scope considered for analysis of this criterion is a 1-mile-radius area from the proposed Project. A 1-mile radius is reasonable in light of the relatively small amounts and types of hazardous materials that would be associated with construction and operation of the proposed Project.

The proposed Project in conjunction with other cumulative projects would include the use, storage, and disposal of varying quantities of hazardous materials. The proposed Project does not include any substantive emissions of hazardous materials such as might be associated with industrial land uses (e.g., manufacturing, chemical processing, handling of bulk quantities of hazardous materials or wastes). Just as with the proposed Project, all commercial uses/businesses would be required to submit business information and hazardous materials inventory forms contained in a Hazardous Materials Management Plan and Hazardous Materials Business Plan. The LACoFD, as the CUPA, and other CUPA agencies for the cumulative projects outside of LACoFD's jurisdiction, requires all new commercial and other users to follow applicable regulations and guidelines regarding storage and handling of hazardous waste. All hazardous materials are required to be stored and handled according to manufacturer's directions and local, State, and federal regulations. With adherence to existing regulatory requirements, releases from routine transport, use or disposal of hazardous materials would be minimized, and in the unlikely event of a release, would likely be localized in extent.

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As noted above, adherence to the regulatory requirements would ensure that incidents at the proposed Project and other cumulative projects within a 1-mile radius are infrequent, and thus unlikely to occur simultaneously in a way that could result in the public or environment being exposed to multiple releases of hazardous materials. For the reasons described above, the proposed Project, in conjunction with other cumulative projects, would not create a cumulatively significant hazard impact to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, this cumulative impact would be less than significant.

Construction and operation of the proposed Project, like the other largely residential and commercial cumulative projects identified in **Section 4.0, 4.0.6: Cumulative Assumptions**, would include the use of relatively small quantities of hazardous materials and generation of small amounts of hazardous wastes. The proposed Project and other cumulative projects would not require the transport, storage, use, or disposal any unusually large, toxic, or explosive quantities of hazardous materials or hazardous wastes. The proposed Project and other cumulative residential and commercial projects, would use, store, handle, and dispose of relatively limited quantities of hazardous materials, such as cleaning fluids, lubricants, paints, and fuels. Similarly, these types of projects generate small quantities of hazardous wastes, including small leftover amounts of hazardous materials previously discussed, paint cans, medical wastes, and the like.

The proposed Project and cumulative projects and their associated businesses would be required to adhere to the comprehensive set of existing federal, State, and local regulatory requirements, including the HMBP programs administered by the LACoFD. These programs require all users of hazardous materials to implement employee training, safe storage, and appropriate handling requirements to ensure that upset and accident conditions are minimized. In the unlikely event that an accidental release was to occur, these programs require spill response measures to ensure that incidents are quickly contained and, therefore, would not travel off site in a way that could cumulatively combine to affect large numbers of people or affect substantial parts of the environment.

The proposed Project and cumulative projects would be required to operate in conformance with established safety requirements during operation to ensure compliance with City emergency service and warning systems. The proposed Project and cumulative projects would operate in conformance with ASCE standards and Federal Transportation Administration requirements. The proposed Project's and cumulative projects' safety and security programs would be subject to the requirements of CPUC and State Safety Oversight of Fixed Guideway Transit Systems. In addition, operation of the proposed Project and cumulative projects would be required to adhere to all State and local safety requirements including those of the City's fire and police departments. With adherence to the federal, State, and local safety

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requirements, the proposed Project, in conjunction with other cumulative projects, would not conflict the requirements of an emergency response plan or emergency evacuation plan.

For the reasons described above, the proposed Project, in conjunction with other cumulative projects, would not create a cumulatively considerable hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Therefore, cumulative impacts would not be significant.

#### 4.8.9 CONSISTENCY WITH CITY OF INGLEWOOD GENERAL PLAN

There are no specific policies within the General Plan that apply to the proposed Project regarding hazards or hazardous materials. The City's General Plan Safety Element outlines measures related to potential hazardous materials incidents. As discussed above, compliance with federal, State, and local laws and regulations relating to transport, storage, disposal, and sale of hazardous materials would minimize any potential for accidental release or upset of hazardous materials.

There are no specific policies within the General Plan that apply to the proposed Project regarding emergency response and emergency evacuation plans. The City's General Plan Safety Element outlines measures related to disasters that require emergency evacuation plans. As discussed above, compliance with federal, State, and local laws and regulations relating to emergency response and emergency evacuation plans would ensure consistency with the General Plan Safety Element.

## 4.9 LAND USE AND PLANNING

### 4.9.1 INTRODUCTION

This section of the Recirculated Draft Environmental Impact Report (Recirculated Draft EIR) provides an analysis of the potential land use impacts of the proposed Inglewood Transit Connector Project (proposed Project). In response to comments received on the December 2020 Draft EIR, the design of the Maintenance and Storage Facility (MSF) for the Automated Transit System (ATS) system was modified to allow the Vons grocery store currently located on the proposed MSF site to remain on this site in a new building to continue to serve the community. Other modifications to the Project since release of the December 2020 Draft EIR include the realignment of the proposed ATS alignment on Prairie Avenue to the west side of the street to allow for single column alignment and allow the street to be open to the sky, as well as the relocation of one of the proposed stations to the southwest corner of Prairie Avenue and Manchester Boulevard to address stakeholder concerns, including Inglewood Unified School District. As a result of these modifications to the design of the Project and other comments on the December 2020 Draft EIR, changes and additions to the proposed approval and actions required to implement the Project were identified as described in Section 3.8 in Section 3.0, Project Description.

This section analyzes the potential for the Project as currently proposed, to physically divide the existing community and conflict with applicable land use plans, policies, and regulations. This section describes existing land use conditions, general plan designations, and zoning as necessary to evaluate the potential land use impacts of the Project as currently proposed.

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Draft EIR.

### 4.9.2 METHODOLOGY

The significance of potential impacts of the proposed Project is determined based on the thresholds of significance described below in *Section 4.9.5: Thresholds of Significance*. The evaluation of land use impacts identifies applicable land use plans and policies and assesses whether the proposed Project is inconsistent with those plans and policies. The study area for the land use impact analysis is the City of Inglewood (City), with a focus on land uses located in proximity to the proposed Project. The analysis of whether the proposed Project would physically divide an existing community considers whether the existing land uses near the proposed Project and the ATS components, including the guideway, stations, and support facilities would create a barrier that would divide the community. The Project is also analyzed for consistency with existing policies, regulations, and programs adopted for the purpose of avoiding or mitigating an environmental effect. If an established program goal and/or policy is relevant to another

environmental resource and has been analyzed in another section, readers are referred to the appropriate environmental resource section for the discussion.

### 4.9.3 REGULATORY FRAMEWORK

#### 4.9.3.1 State Plans and Regulations

##### **Senate Bill 535**

Senate Bill 535 was signed into law on September 30, 2012. This bill directs 25 percent of the proceeds from the Greenhouse Gas Reduction Fund to projects that provide a benefit to disadvantaged communities. As part of the legislation, CalEPA was assigned the responsibility of identifying communities that are considered disadvantaged throughout California. A list of disadvantaged communities was released by CalEPA in April 2017. The proposed Project is within or adjacent to disadvantaged communities as defined in Senate Bill 535 and identified by CalEPA.<sup>1</sup>

##### **Assembly Bill 1550**

Assembly Bill 1550 was signed into law on September 14, 2016. This bill builds on Senate Bill 535 by requiring the Greenhouse Gas Reduction Fund investment plan to allocate (1) a minimum of 25 percent of the available funds to projects located within, and benefiting individuals living in, disadvantaged communities, (2) an additional minimum of 5 percent of the available funds to projects that benefit low-income households or to projects located within, and benefiting individuals living in, low-income communities located anywhere in the State, and (3) an additional minimum of 5 percent of the available funds either to projects that benefit low-income households that are outside of, but within a ½ mile of, disadvantaged communities, or to projects located within the boundaries of, and benefiting individuals living in, low-income communities that are outside of, but within a ½ mile of, disadvantaged communities. The proposed Project is within or adjacent to disadvantaged communities as defined in Assembly Bill 1550.<sup>2</sup>

#### 4.9.3.2 Regional Plans and Regulations

##### **SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy**

The Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Communities Strategy (RTP/SCS) was adopted in September 2020. The RTP/SCS is a long-range visioning plan that serves as an important planning document for the region that balances future mobility

<sup>1</sup> OEHA. *SB 535 Disadvantaged Communities*. <https://oehha.ca.gov/calenviroscreen/sb535>. Accessed September 15, 2020.

<sup>2</sup> California Air Resources Board. *Priority Population Investments*. <https://ww3.arb.ca.gov/cc/capandtrade/auctionproceeds/communityinvestments.htm>. Accessed September 15, 2020.

and housing needs with economic, environmental, and public health goals. The plan charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably. The RTP/SCS includes land use policies to guide the region's development, including economic development and land use near transit.

The proposed Project is included in the Project List under the 2020-2045 RTP/SCS program (RTP ID S1200T100)<sup>3</sup> in support of the RTP Framework.

Applicable goals from the 2020-2045 RTP/SCS include:

- Goal 2:** Improve mobility, accessibility, reliability, and travel safety for people and goods
- Goal 3:** Enhance the preservation, security, and resilience of the regional transportation system
- Goal 4:** Increase person and goods movement and travel choices within the transportation system
- Goal 5:** Reduce greenhouse gas emissions and improve air quality
- Goal 6:** Support healthy and equitable communities
- Goal 7:** Adapt to a changing climate and support an integrated regional development pattern and transportation network
- Goal 8:** Leverage new transportation technologies and data-driven solutions that result in more efficient travel

#### 4.9.3.3 Local Plans and Regulations

##### **Los Angeles County Airport Land Use Commission Airport Land Use Plan**

The Los Angeles County Airport Land Use Commission adopted the Los Angeles County Airport Land Use Plan in 1991 (revised 2004) in order to comply with State law and coordinate planning efforts surrounding public-use airports in the County.<sup>4</sup> The purpose of the Commission is to protect the public health, safety, and welfare through ensuring compatibility of land uses near public-use airports and minimizing the public's exposure to excessive noise and safety hazards within areas around public-use airports. Los Angeles International Airport (LAX) is located approximately 2 miles southwest of the proposed Project.<sup>5</sup>

<sup>3</sup> SCAG. *ConnectSoCal. Adopted Final Connect SoCal. Transportation System Project List*. [https://www.connectsoocal.org/Documents/Adopted/fConnectSoCal\\_Project-List.pdf](https://www.connectsoocal.org/Documents/Adopted/fConnectSoCal_Project-List.pdf). Accessed September 15, 2020.

<sup>4</sup> Los Angeles County Airport Land Use Commission, *Los Angeles County Airport Land Use Plan*, adopted 1991 and revised 2004.

<sup>5</sup> Google Maps, 2017. Available at [maps.google.com](https://maps.google.com).

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As shown in Figure 4.9-1: Los Angeles International Airport – Airport Influence Area, a portion of the proposed ATS alignment on Manchester Boulevard and Prairie Avenue is located within the airport influence area<sup>6</sup> and the 65 decibel (dB) community noise equivalent level (CNEL) noise contour for Los Angeles International Airport.

**City of Inglewood General Plan**

California State law requires every city and county to adopt a comprehensive General Plan to guide its future development. The proposed Project is located entirely within the City. The City’s General Plan includes the following elements: Land Use, Circulation, Safety, Noise, Housing, Open Space, Conservation, and Environmental Justice Elements.<sup>7, 8</sup>

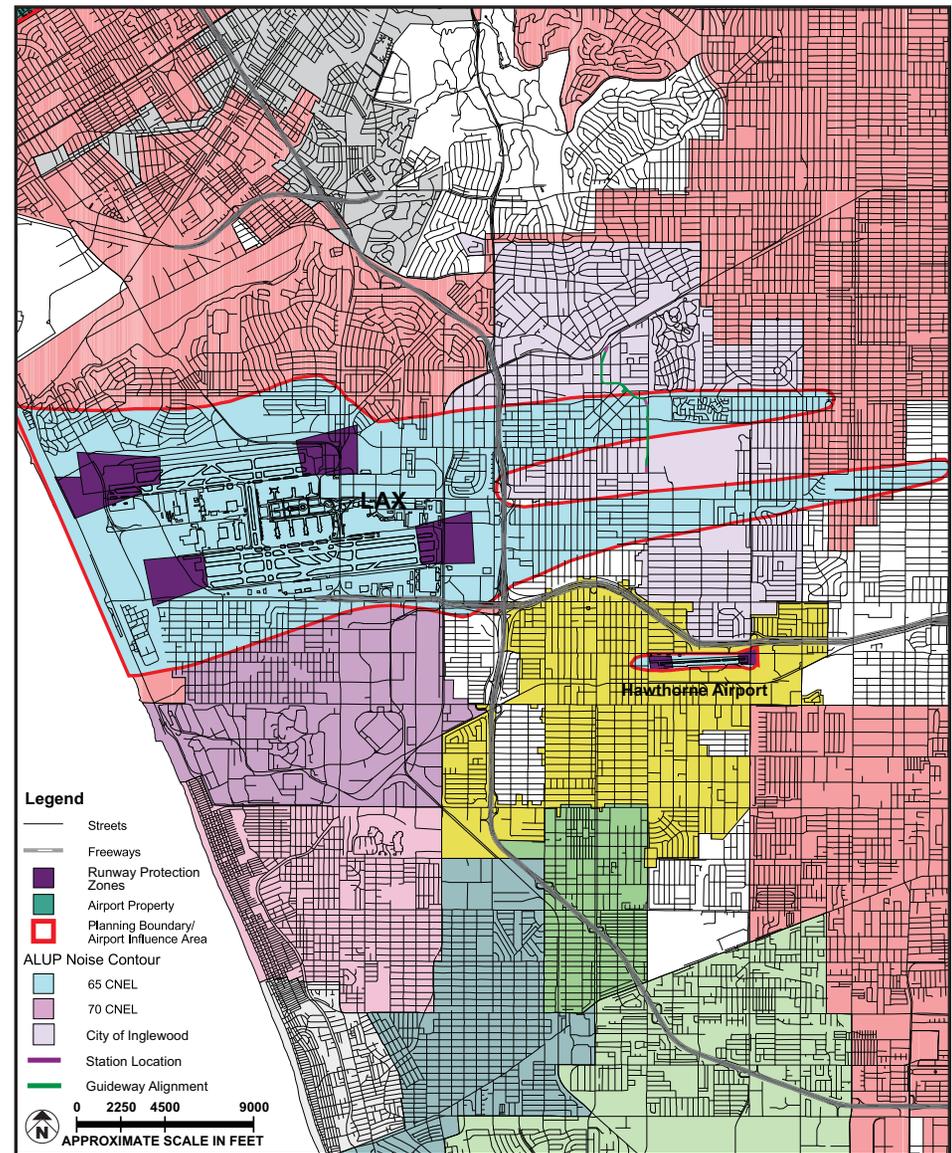
**Land Use Element**

The Land Use Element<sup>9</sup> was adopted in 1980 and subsequently amended in 1986, 2009, and 2016. The Land Use Element presents a long-range plan for the general distribution and intensity of public and private land uses within the City. The goals applicable to the proposed Project are identified below:

**Goals—General**

- Provide for the orderly development and redevelopment of the City while preserving a measure of diversity among its parts. Allocate land in the City to satisfy the multiple needs of residents but recognize that land is a scarce resource to be conserved rather than wasted.
- Help promote sound economic development and increase employment opportunities for the City’s residents by responding to changing economic conditions.
- Maximize the use and conservation of existing housing stock and neighborhoods and also facilitate development of new housing to meet community needs.
- Promote Inglewood’s image and identity as an independent community within the Los Angeles metropolitan area.

6 An airport influence area is the area which current or future airport-related noise, over flight, safety, and/or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses.  
 7 City of Inglewood *General Plan*, (1980).  
 8 City of Inglewood *General Plan*, “Environmental Justice Element” (April 2020).  
 9 City of Inglewood *General Plan*, “Land Use Element” (1980).



SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021

FIGURE 4.9-1



Los Angeles International Airport – Airport Influence Area

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**Goals—Commercial**

- Create and maintain a healthy economic condition within the present business community and assist new business to locate within the city.
- Protect local businessmen and encourage the importance of maintaining a strong commercial district in the downtown.
- Improve the visual appearance and economic condition of the existing arterial commercial development along Inglewood’s major streets.
- Promote the development of commercial/recreational uses which would complement those which already are located in Inglewood.

**Goals—Industrial**

- Increase the industrial employment opportunities for the City’s residents.

**Goals — Circulation**

- Ensure that proposed new uses can be accommodated by adequate and safe streets.
- Promote and support adequate public transportation within the City and the region.
- Develop modified traffic systems that would discourage through traffic from utilizing neighborhood streets.
- Develop a safe and adequate pedestrian circulation system which is barrier-free for the handicapped.

**Goals — Community Facilities**

- Maintain the present high level of police and fire services to the extent it is fiscally prudent.
- Expand opportunities for cultural and social growth for the City’s residents.

As part of the Land Use Element, the City adopted the Downtown Transit Oriented District goals and policies in September 2016.<sup>10</sup> Analysis of goals and policies related to historic resources is provided in **Section 4.4: Cultural Resources**. Policies and goals applicable to this section include:

**Downtown Transit Oriented District Goals and Policies (as amended September 2016)**

**Goal 1:** Downtown is a place to live, work, shop, recreate, and be entertained.

**Policy 1.1:** Mixed Use Development. Encourage a range of residential, retail, office, recreational, and institutional uses in the Historic Downtown to create a vibrant urban district and support local business.

<sup>10</sup> City of Inglewood *General Plan, “Land Use Element”* (1980).

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**Policy 1.2:** Ground Floor Uses and Storefronts. Require uses that activate pedestrian activity such as retail on major streets and plaza frontages. Require that storefronts be historically-sensitive, attractive, and transparent in the Historic Downtown.

**Goal 2:** Downtown is a revitalized yet forward-looking gathering place for the community.

**Policy 2.1:** Public Gathering Places. Create public spaces in key locations in the public right-of-way and on privately-owned land. In particular, create a central plaza along Market Street between Florence Avenue and Regent Street and/or in the adjacent parcels suitable for eating, resting and people watching, but also for festivals, concerts, and events at special times.

**Policy 2.2:** Pedestrian Network. Enhance sidewalks, repurpose alleys and create mid-block passthroughs and internal courtyards to serve as pedestrian passageways and enjoyable public spaces.

**Policy 2.3:** Preservation of Historic Fabric. Require the preservation of buildings that have been designated as historic and encourage the reuse of other historic buildings. Maintain the sense of place in areas with historic fabric and/or meaning such as Market Street between Regent Street and Hillcrest Avenue and the Hillcrest neighborhood east of Locust Street.

**Goal 3:** Downtown provides a unique mix of accessibility options including light rail, pedestrians, bicycles, autos, buses, and advanced technology local transit.

**Policy 3.1:** Complete Streets. Accommodate all modes of transportation on streets, with particular attention to transit vehicles and pedestrians, but also design streets to serve as open spaces in the urban environment, places where people gather, communicators of the locality’s culture, vision and values, and generators of development on adjacent parcels.

**Policy 3.2:** Green Boulevards. Create Green Boulevards that protect cyclists, infiltrate stormwater, and use vegetation to create a sense of place on Florence Avenue, La Brea Avenue, Manchester Boulevard and Prairie Avenue.

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**Policy 3.3:** Pedestrian Promenades. Emphasize Market Street and Queen Street as pedestrian promenades that may be closed to automobiles for special events or as conditions require.

daylighted stream through TechTown reflecting topography and flow of water to the treatment plant.

**Policy 3.4:** Pedestrian Connections to Metro Rail. Establish high-quality at-grade and/or bridge connections from the Downtown Inglewood Metro station across Florence Avenue to the south. Make every effort to facilitate a direct pedestrian connection from the station to Beach Avenue to the north.

**Goal 6:** Downtown expresses the unique culture of Inglewood.

**Policy 6.1:** Districts. Define the following unique districts within the Downtown TOD area, each with their own unifying character or identity that should be preserved and enhanced: Historic Downtown, Civic Center, TechTown, Beach Avenue, Fairview West, Hillcrest and Queen Street.

**Policy 3.5:** Local Transit Connections to Metro Rail. Provide quality local transit connections from major destinations such as the NFL Stadium and Forum to Downtown and the Downtown Inglewood Metro station using existing or emerging technologies.

**Circulation Element**

The Circulation Element, adopted in December 1995, serves as a guide for future circulation and transportation developments. The program addresses the adequacy of street access, traffic capacity for current and future land use needs, truck routes, and bicycle routes. For consistency analysis of the proposed Project and the Circulation Element see **Section 4.12: Transportation**.

**Policy 3.6:** Parking District. Establish a parking district with shared parking consolidated in garages, and manage pricing

**Conservation Element**

The Conservation Element, adopted in October 1997, contains goals, guidelines, and policies for the conservation, development, and utilization of natural resources found within the jurisdiction of the City of Inglewood. Resources addressed in the Element include water, soils, natural gas, and oil. For a consistency analysis of the proposed Project and the Conservation Element see **Sections 4.2: Air Quality, 4.3: Biological Resources, and 4.14: Utilities and Service Systems**.

**Goal 4:** Downtown is a major economic engine providing jobs, sales tax, and other revenues.

**Policy 4.1:** Major Sites Development. Develop major sites and create new destinations at the north and south ends of Market Street, immediately north of the Metro station, and on and around the City Yard that create jobs, generate revenues for the city through sales and bed tax and provide new opportunities for residents.

**Housing Element**

The City's current Housing Element<sup>11</sup> was adopted on January 28, 2014. The current version of the Housing Element covers the 5<sup>th</sup> Cycle Regional Housing Needs Allocation (RHNA) projections from 2013-2021. The Housing Element establishes policies to create or preserve quality residential neighborhoods while identifying current and future housing needs and establishes policies and programs to address housing deficiencies. The City is currently updating the Housing Element to reflect the SCAG 6<sup>th</sup> Cycle Regional Housing Needs Assessment allocation for the October 2021 to October 2029 planning period for the City of Inglewood.<sup>12</sup> Adoption of the updated Housing Element is anticipated by March 2022. See **Section 4.11: Population, Employment, and Housing** for consistency analysis of the proposed Project and the Housing Element.

**Policy 4.3:** Equitable Development. Implement policies such as a local hire notification requirement for large employers, Business Improvement District youth guide program and others so that the benefits of growth accrue to the current population of Inglewood. Encourage educational uses wherever possible to improve the job-readiness of the local population.

**Goal 5:** Downtown is a model for economic development.

**Policy 5.1:** Stormwater Management. Collect, clean and infiltrate stormwater runoff on streetscapes, parking lots and roofs wherever possible. Create a

<sup>11</sup> City of Inglewood *General Plan, "Housing Element"* (2014).  
<sup>12</sup> California Government Code Section 65583 (c)(1)(A).

**Noise Element**

The Noise Element, adopted in September 1987,<sup>13</sup> contains a comprehensive program regarding noise control in the planning process, including goals and policies that would guide the local planners in achieving and maintaining compatible land uses with environmental noise levels. Noise sensitive uses include residential, schools, hospitals, libraries, and parks. A consistency analysis was conducted for the Noise Element and discussed in **Section 4.10: Noise and Vibration**.

**Open Space Element**

The Open Space Element adopted in December 1995 addresses the current and future recreation needs of the community for park land and recreational facilities and plans for the conservation or creation of open spaces to mitigate the effects of increasing urbanization of Inglewood. See Revised Initial Study for the no impact finding under Section 2.14: Public Services, Threshold (a) iv, Parks. The proposed Project would not have impacts on parks and would not directly generate population growth, which would require more recreational facilities.

**Safety Element**

The General Plan Safety Element adopted in July 1995<sup>14</sup> and amended in 2020, contains goals, objectives, and policies that protect the welfare and safety of the citizens of Inglewood and their properties, and the community as a whole, from risks associated with a variety of natural and man-made disasters. These disasters include, but are not limited to, earthquakes, flooding, fires, and airplane crashes. See **Section 4.6: Geology and Soils** for the consistency analysis of the proposed Project with the Safety Element.

**Environmental Justice Element**

The Environmental Justice Element, adopted on June 30, 2020, provides guidelines to minimize pollution and its effects on the community, and ensure that all residents have a say in decisions that may affect their quality of life. The State of California defines Environmental Justice as “the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.”<sup>15</sup> The goals and policies that apply to the proposed Project are presented below:

<sup>13</sup> City of Inglewood *General Plan*, “Noise Element” (1987).  
<sup>14</sup> City of Inglewood *General Plan*, “Safety Element” (1995).  
<sup>15</sup> *California Government Code §65040.12. e.*

**Goal 1:** Residents and stakeholders who are aware of, and effectively participate in, decisions that affect their environment and quality of life.

**Policy:** Participation and Collaboration

**EJ-1.11:** Conduct broad outreach on public hearings that affect the environment in languages used by the community.

**EJ-1.12:** Inform the public on decisions that affect their environment using multiple communication methods, including traditional and online forms of communication.

**EJ-1.13:** Provide written notices and other announcements regarding key land use and development issues in English and Spanish where feasible. For all other materials, note that verbal translation assistance is available.

**EJ-1.14:** Offer interpretation services at key meetings and workshops on issues affecting the environment.

**EJ-1.15:** Consider offering childcare at key meetings and workshops on environmental issues affecting entire neighborhoods and the City as a whole.

**EJ-1.16:** Consider varying the time and date of key meetings and workshops, or holding multiple meetings and workshops, in order to ensure broad participation.

**EJ-1.17:** Seek feedback on public decisions through traditional and online forms of communication, such as website, email, mobile phone apps, online forums, and podcasts.

**EJ-1.18:** Partner with community-based organizations that have relationships, trust, and cultural competency with target communities to outreach on local initiatives and issues.

**Goal 2:** The community’s exposure to pollution in the environment is minimized through sound planning and public decision making.

**Policy:** General Environmental Health

**EJ-2.1:** Incorporate compliance with State and federal environmental regulations in project approvals.

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- EJ-2.2:** Work with other agencies to minimize exposure to air pollution and other hazards in the environment.
- EJ-2.3:** Ensure compliance with rules regarding remediation of contaminated sites prior to occupancy of new development.
- EJ-2.4:** Create land use patterns and public amenities that encourage people to walk, bicycle and use public transit.
- EJ-2.8:** Encourage new development to reduce vehicle miles traveled to reduce pollutant emissions.
- 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.
- EJ-2.13:** Continue to reduce pollution entering the storm drain system through the incorporation of best management practices.

**Goal 3:** A community that promotes physical activity and opportunities for active living.

**Policy:** Access and Connectivity

- EJ-3.4:** Require the provision of on-site bicycle facilities in new large-scale development projects.
- EJ-3.5:** Partner with transit agencies to ensure that parks and recreational facilities are accessible to low-income and minority populations.
- EJ-3.7:** Encourage new specific plans and development projects be designed to promote pedestrian movement through direct, safe, and pleasant routes that connect destinations inside and outside the plan or project area.

**Goal 4:** Healthy, affordable, and culturally appropriate food is readily available to all members of the community.

**Policy:** Affordable and Nutritious Food

- EJ-4.4:** Maximize multimodal access to fresh food by encouraging grocery stores, healthy corner stores, and outdoor markets at key

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transit nodes and within new transit-oriented development projects.

**Goal 6:** Adequate and equitably distributed public facilities are available in the community.

- EJ-6.1:** Ensure the City provides equitable public improvements and community amenities to all areas of the City.
- EJ-6.2:** Prioritize the City's capital improvement program to address the needs of disadvantaged communities.
- EJ-6.3:** Plan for the future public improvement and service needs of underserved communities.
- EJ-6.6:** Provide ongoing infrastructure maintenance in existing residential neighborhoods through the capital improvement program.
- EJ-6.8:** Ensure that new public facilities are well designed, energy efficient and compatible with adjacent land uses.
- EJ-6.10:** Coordinate with the Inglewood Unified School District, transit agencies and other public agencies to provide adequate public facilities, improvements, and programs to the City of Inglewood.

***New Downtown Inglewood and Fairview Heights Transit Oriented Development Plan and Design Guidelines***

The Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines (TOD Plan) address Downtown Inglewood and the Fairview Heights neighborhoods and implements the City's vision for transforming the quality of the environment within these areas.<sup>16</sup> The Downtown TOD Plan area consists of approximately 585 acres located in the center of Inglewood along the Metro K line just east of the Florence Avenue/La Brea Avenue intersection. The Downtown TOD Plan area extends approximately one-half mile in all directions from the Metro K Line Downtown Inglewood Station. The Fairview Heights TOD Plan area consists of approximately 328 acres located near the intersection of Florence Avenue and West Boulevard. This Fairview Heights TOD Plan area also extends approximately one-half mile in all directions from the Downtown Inglewood Metro K Line Station.

<sup>16</sup> City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, November 1, 2016.

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The TOD Plan includes goals and policies which were incorporated into the Land Use Element goals and policies in 2016 under the Downtown Transit Oriented District Goals and Policies section. The TOD Plan further includes concept plans, zoning, development standards, design guidelines, and an implementation action plan for consideration by applicants submitting any proposals for new construction or rehabilitation within the TOD Plan area, submitting project plans for design review, as well as for consultation by City Staff when making recommendations for project approvals. The TOD Plan also addresses architectural detail, signage, public art, and civic and cultural life.

The proposed Project is located within the Historic Downtown and Hillcrest Districts as defined in this plan. The Historic Downtown District is pedestrian-oriented and human-scaled. Under the plan, the Historic Downtown District would function as a regional destination and gathering space for all in the City of Inglewood that links residents with the community's past, present, and future. This district would include public space, restaurants, entertainment, residential uses and limited hotel and office uses. The goal for the Hillcrest District is to retain the District's present character and continue to be home to churches, neighborhood retail uses, as well as residences.

#### **Hollywood Park Specific Plan**

The Hollywood Park Specific Plan (HPSP) establishes development standards and design guidelines for the 298-acre Hollywood Park site at the northeast corner of the Prairie Avenue and Century Boulevard intersection and provides an overview of existing infrastructure and necessary improvements related to the site, including measures for implementation of the HPSP. The site is currently under development. SoFi Stadium was completed in August 2020 and development of a 6,000-seat entertainment venue, parks, and retail, office, housing, entertainment, gaming, hotel, and civic uses are also allowed by the HPSP.<sup>17</sup>

The HPSP includes guidelines and standards for improvements in and fronting the public right-of-way within the Plan area, which includes approximately 0.5 miles of street frontage along Prairie Avenue where the proposed Project will be located. The HPSP provides integrated and coordinated landscape design guidelines for new development along the perimeter of the Plan area with the objective of promoting land use compatibility, particularly along Prairie Avenue. The HPSP includes streetscape standards in order to integrate Hollywood Park with the adjoining urban fabric, achieve a diverse urban forest, and assist in developing districts of distinctive and appropriate character.<sup>18</sup> Sidewalk widths provide comfortable walking routes and parkway widths are designed to provide sufficient area for urban tree growth. The streetscape will also include identity elements that will differentiate Hollywood Park

<sup>17</sup> City of Inglewood, Hollywood Park Specific Plan, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015.

<sup>18</sup> City of Inglewood, Hollywood Park Specific Plan, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015.

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from nearby developments, including unique architectural features, special landscape (such as seasonal displays of color), graphic elements (such as signs or logos), special pedestrian or automobile paving, special night lighting effects, or other similar features.

The HPSP area has an existing General Plan designation that permits an overall floor area ratio of 2:1 averaged over the entire 298-acre site. The General Plan designation is vested by a Development Agreement approved by the City in February 2015. The analysis in this EIR assumes 5.25 million square feet (SF) of future commercial development, consistent with the vested General Plan provisions, will be completed in the cumulative development scenario.

#### **The Forum Development Agreement**

In 2013, the City of Inglewood entered into a Development Agreement with the Forum Landowner and authorized a \$100 million renovation plan, which included new and increased total seats, a new Forum Club, and a larger concession area. As part of the Development Agreement, the City acknowledged, among other things, that 3,530 parking spaces located on the Forum Property, and the current configuration (including the layout, landscaping, size of spaces, and drive aisles) is legally non-conforming, and the improvements contemplated by the Forum project approvals did not constitute a change to such legally non-conforming status.

#### **City of Inglewood Planning and Zoning Ordinance**

The City of Inglewood Planning and Zoning Code (Chapter 12 of the Inglewood Municipal Code (IMC) is the primary land use regulation in the City.<sup>19</sup> The purpose of the Zoning Code is to protect and promote the public's health, safety, and general welfare, and to implement the policies of the comprehensive General Plan. The Zoning Ordinance describes the zoning districts and land use classifications, land use regulations, environmental standards, and developments standards relating to issues such as intensity, setbacks, height, and parking.

#### **4.9.4 EXISTING CONDITIONS**

##### **4.9.4.1 Existing Land Uses**

The City of Inglewood was historically developed as a low-density single-family community and is transitioning to include higher density development with the implementation of land use plans such as the New Downtown and Fairview Heights TOD Plan and the HPSP. These plans allow and encourage mixed-use development focusing on walkability, density, and TOD.

<sup>19</sup> City of IMC, Chapter 12.

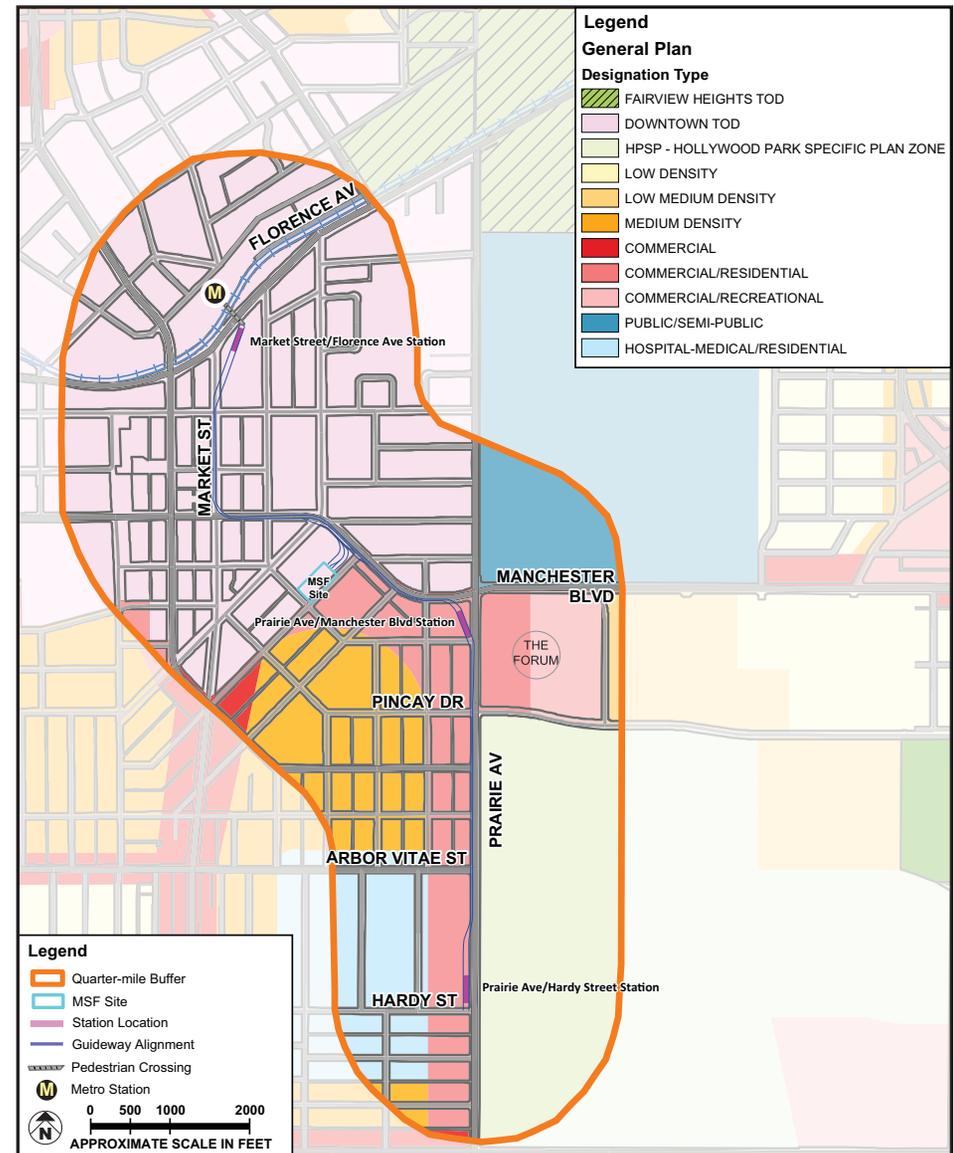
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As of 2016, land uses in the City were comprised of residential (46.7 percent), right-of-way (23.5 percent), public/semi-public (20.3 percent), commercial (6.1 percent) and industrial (3.7 percent) uses.<sup>20</sup> Existing zoning allows 60 percent of residentially zoned land to be developed into two-family or multifamily units. Today, there are more multifamily dwelling units than single-family units in the City.

Commercial uses are typically located along major arterials in the City of Inglewood. The two major components of commercial land uses include retail service and automobile sales and service, representing 63 percent and 20 percent, respectively, of all commercial uses. The City is experiencing a growth of light industrial oriented uses focused on shipping in and out of LAX. Zoning for light industrial represents 75 percent of land zoned for industrial uses while the remaining 25 percent is zoned for heavy industrial uses. Land uses included within the City's public/semi-public areas include parks, schools, government buildings and facilities, churches, the Inglewood Cemetery, and hospitals. The City's right-of-way area includes 180 miles, or 1,337 acres, of streets and alleys. The City is primarily developed. A majority of the vacant land in the City is designated for industrial land uses with minimal vacant land designated for residential and commercial uses.<sup>21</sup>

Further descriptions of existing land uses along the proposed Project for the guideway is provided below. The proposed Project is described in three segments: the Market Street Segment, the Manchester Boulevard Segment, and the Prairie Avenue Segment. Descriptions for each segment are then broken down into descriptions of General Plan designations, followed by a description of the existing zoning, and ending with a description of existing physical uses on site (such as retail, schools, churches). Two figures are included to show the land use designations under the General Plan and IMC in the Project footprint. The figures include the following: **Figure 4.9-2: General Plan Land Use Designations**, and **Figure 4.9-3: Zoning Map**.

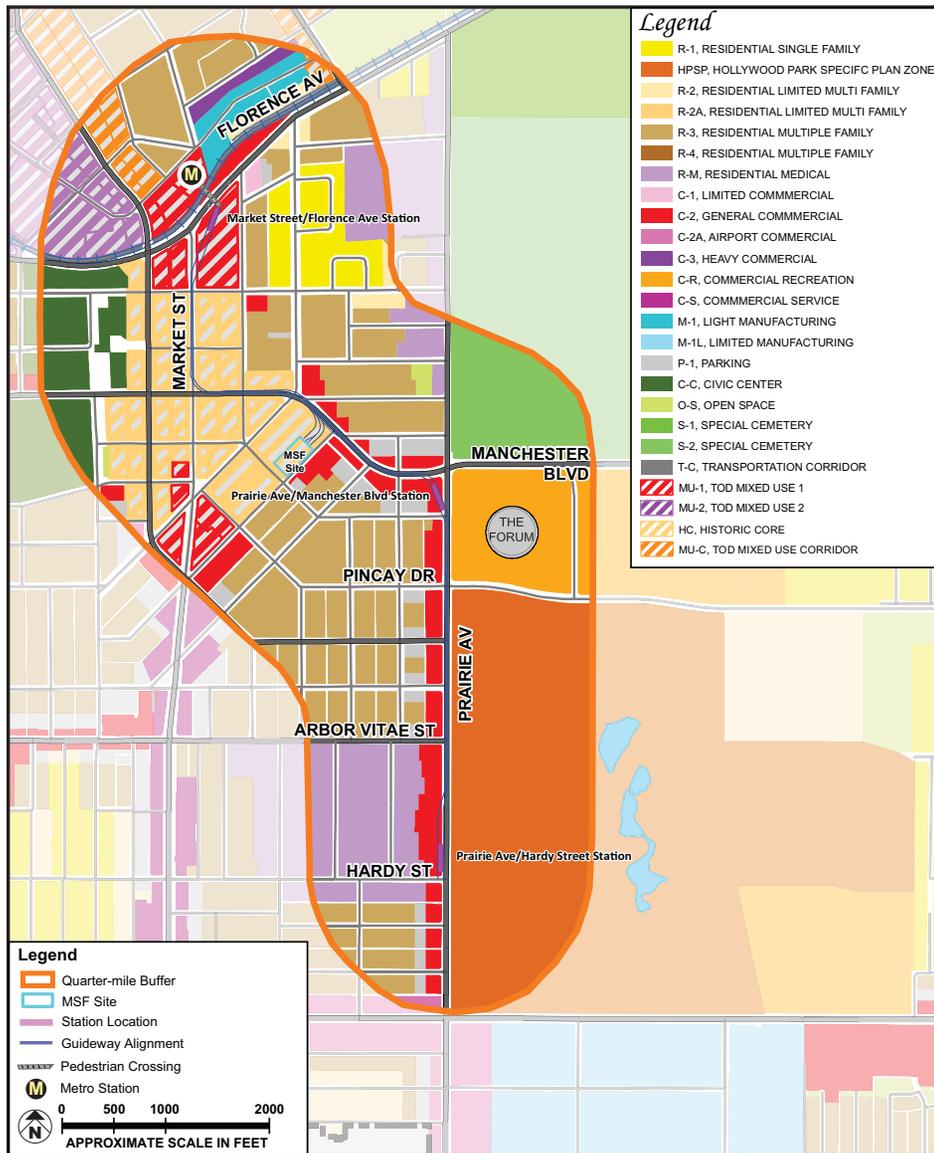
20 City of Inglewood, *City of Inglewood General Plan, Land Use Element, Land Use Comparison table*, Inglewood Land Use, p. 54, updated 2016, <https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-pdf>.  
 21 City of Inglewood, *City of Inglewood General Plan, Land Use Element*, p. 10, updated 2016. <https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-pdf>.



SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021

FIGURE 4.9-2





SOURCE: City of Inglewood - 2017; Meridian Consultants LLC - 2021

FIGURE 4.9-3



208-001-18

### Market Street Segment

The Market Street Segment extends from the intersection of Market Street and Florence Avenue to the intersection of Market Street and Manchester Boulevard. As shown in **Figure 4.9-2**, the entire Market Street Segment is designated Downtown TOD in the General Plan Land Use Map. The Downtown TOD designation is a component of the New Downtown Inglewood and Fairview Heights TOD Plan,<sup>22</sup> which as discussed previously, was approved in 2016. The plan defines the allowable uses within each area.

As shown in **Figure 4.9-3**, the Market Street Segment is almost entirely designated Historic Core (HC)<sup>23</sup> on both sides of the roadway, with only two parcels directly south of Florence Avenue being outside of the HC zone and designated as TOD Mixed Use 1 (TOD MU-1). The HC zone is intended to provide for a mix of land uses, including commercial services such as retail, restaurants, and offices and civic uses, including public and quasi-public facilities. Residential uses are also allowed in the HC zone. The land use patterns and sizes of the developments in this zone are intended to be consistent with the existing historic urban fabric. The HC zone permits a maximum height of five stories or 68 feet, no minimum lot size, and public street setback of zero feet. An exception to this condition is given to portions of parcels directly adjacent to Market Street, which are limited in height to three stories or 45 feet within 20 feet of Market Street.

The objective of the TOD MU-1 zone is to provide larger-scale transit-oriented development at a higher density. A variety of uses are allowed in the TOD MU-1 zone and the mixing of uses is encouraged. Allowable uses in the TOD MU-1 zone include ground-level retail, services, public-serving offices, and upper-level residential, office, hotel, or institutional functions. Plazas and shared parking structures are also encouraged. The TOD MU-1 zone is further divided into three separate districts: North Station, North Market Place, and South Market Place. The parcels adjacent to the proposed Project are located in the North Market Place district, with a height limit of up to eight stories or 104 feet, minimum lot size 80,000 SF, and public street setback of zero feet.

Zoning east of Locust Street and north of Regent Street, adjacent to the Market Street/Florence Avenue Station is TOD MU-1 on the north end and Residential Multifamily (R-3) to the south. In the event of a conflict between the Downtown TOD plan and the IMC designated zoning, the Downtown TOD Plan would

22 City of Inglewood. *The New Downtown Inglewood & Inglewood TOD Plans*. <http://inglewood.arroyogroup.com/wp-content/uploads/2017/01/The-New-Downtown-Fairview-Heights-TOD-Plan-Design-Guidelines-lo-res.pdf>, accessed July 2020.

23 City of Inglewood. *New Downtown Inglewood and Fairview Heights TOD Plan*. <http://inglewood.arroyogroup.com/wp-content/uploads/2017/01/The-New-Downtown-Fairview-Heights-TOD-Plan-Design-Guidelines-lo-res.pdf>. Accessed September 17, 2020.

#### 4.9 Land Use and Planning

override the requirements within the IMC designated zoning requirements.<sup>24</sup> However, in the event that the Downtown TOD Plan does not address a regulatory requirement, the IMC prevails.

At the north end of the segment is a commercial shopping center that includes 15 parcels and contains restaurants, an auto parts shop, retail stores, pharmacy, cosmetic services, and a dental office. Existing uses adjacent to Locust Street consist of single-family and multifamily residential homes to the east, adjacent to the shopping plaza. North of Florence Avenue on the other side of the Metro K Line are additional retail commercial uses including a grocery store, pharmacy, and cosmetic services. A senior housing project, bank, and beauty salons are located south of Regent Street and the shopping plaza. The existing land use west of the plaza is a vacant lot which is currently being developed with a commercial/residential mixed-use project.

Commercial uses border the street on both sides of Market Street from south of Regent Street up to the intersection with Manchester Boulevard. Uses on the west side of Market Street, from north to south consist of a beauty salon, a vacant lot planned for mixed-use development, restaurants, the former Fox Theater building, a repair shop, public employment services, retail stores, and an office building. On the east side of Market Street, the existing land uses from Regent Street to Manchester Avenue include a bank, a vacant lot planned for mixed-use development, art gallery, restaurants, retail stores, and a commercial office.

#### **Manchester Boulevard Segment**

The Manchester Boulevard Segment extends from the intersection of Market Street and Manchester Boulevard to the intersection of Manchester Boulevard and Prairie Avenue. A majority of the Manchester Boulevard Segment is designated Downtown TOD on the General Plan Land Use Map as shown in **Figure 4.9-2**. The area southeast of Manchester Boulevard and Spruce Avenue is designated Commercial/Residential.

As shown in **Figure 4.9-3**, the majority of the Manchester Boulevard Segment is zoned HC on either side of the street from the intersection with Market Street to the intersection with Hillcrest Boulevard. Starting on the south side of Manchester Boulevard, the HC zone extends past Hillcrest Boulevard all the way to Spruce Avenue, including the proposed MSF site. On the north side of Manchester Boulevard zoning is General Commercial (C-2). The height limit for the C-2 zone is 6 stories or 75 feet, with no setback requirements.

<sup>24</sup> Inglewood Municipal Code 12-16.8.

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The area located south of Manchester Boulevard from Spruce Avenue to Prairie Avenue is zoned C-2. Under the IMC, the C-2 zone allows for a variety of commercial uses (e.g., retail and service businesses) and does not allow for new residential uses. The height limit for the C-2 zone is six-stories or 75 feet, with no setback requirements except those contained in the City's General Design Guidelines (1979).

Land uses on Manchester Boulevard consist of primarily commercial uses. Land uses on the north side of Manchester Boulevard from west to east include retail stores, a dentist office, and a restaurant. Near Manchester and Hillcrest Boulevards is a gas station medical clinic, advertising agency, a retail store, and an institutional (religious) facility. Near Manchester Drive and Osage Avenue is an insurance office, an institutional (religious) facility, and multifamily housing. An auto shop and a restaurant are located on Manchester Boulevard at Prairie Avenue. A cemetery is located across Prairie Avenue to the north.

On the south side of Manchester Boulevard, traveling from west to east to Hillcrest Boulevard uses include retail stores, a pharmacy, and restaurants. Between Hillcrest Boulevard and Spruce Avenue is a shopping center that includes a grocery store with a gas station. Other uses located within the grocery store shopping center include a bank branch, coffee shop, and gym. East of Spruce Avenue, the south side of the roadway is lined with retail shops, a day care facility, and a real estate office. Moving past Osage Avenue towards Prairie Avenue is a tire shop, non-profit organization, dry cleaner, dentist office, daycare facility, commercial buildings, and a vacant lot.

#### **Prairie Avenue Segment**

The Prairie Avenue Segment extends from the intersection of Prairie Avenue and Manchester Boulevard to the northwest corner of the Prairie Avenue and Hardy Street intersection. The entire area west of Prairie Avenue is designated Commercial/Residential by the General Plan (see **Figure 4.9-2**). East of Prairie Avenue, The Forum is designated Commercial/Recreational and Commercial/Residential. South of the Forum, the HPSP is designated Major Mixed-Use which continues until Century Boulevard. The Major Mixed Use designation permits an overall floor area ratio of 2:1 averaged over the entire 298-acre Hollywood Park site.

As shown in **Figure 4.9-3**, the area west of Prairie Avenue is zoned C-2 for the entirety of the segment. Land uses on the west side of Prairie Avenue from the north to Kelso Avenue, include a vacant lot, daycare facility and Kelso Elementary School. South of Kelso Avenue is a restaurant and a funeral home before the land use transitions into residential uses. On either side of Buckthorn Street are retail stores and continuing south between Buckthorn and Arbor Vitae Streets is an institutional (religious) facility and a motel. South of Arbor Vitae Street is a restaurant, convenience store, a vacant building, more restaurants, beauty salons, and a repair shop in a commercial center.

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The area east of Prairie Avenue is zoned Commercial Recreation (C-R) north of Pincay Drive and HPSP south of Pincay Drive. The C-R zone allows for a variety of commercial entertainment uses including, among others, animal exhibitions, athletic events, social events, and conventions. The height limit for the C-R zone is 150 feet in height from natural grade with a 30 feet setback from the property line. The setback area can be used to accommodate landscaping or landscaped parking/subterranean parking. The HPSP is a Mixed-Use specific plan that includes SoFi Stadium and allows development of a mix of uses, including retail, office, commercial and residential uses. Starting on the north end of Prairie Avenue, the Inglewood Park Cemetery is located on the northeast corner of Prairie Avenue and Manchester Boulevard. The Inglewood Park Cemetery is located on 200 acres of land with park-like vegetation throughout the site. South of Manchester Boulevard is the Forum, a historic commercial recreational venue built in 1967. South of Pincay Drive is the recently completed SoFi Stadium with additional development ongoing south of the stadium. The HPSP area, including SoFi Stadium, includes 298 acres east of Prairie Avenue extending to Century Boulevard.

The City's Medical Enterprise Overlay Zone overlays the Residential and Medical (R-M) and C-2 Zones along Prairie Avenue between Manchester Boulevard and Hardy Street. This overlay allows for development of hospitals, medical offices, real estate, and insurance offices, dental offices, and ancillary uses, along with some entertainment and personal care uses and shopping centers only on properties zoned C-2.

#### 4.9.5 ADJUSTED BASELINE CONDITIONS

This section assumes the Adjusted Baseline Environmental Setting as described in **Section 4.0: Environmental Impact Analysis, 4.0-5: Adjusted Baseline**. Related to land use, the changes associated with the Adjusted Baseline affect the vacant land immediately east of the proposed Project across Prairie Avenue, which would be developed with retail, restaurant, commercial, and residential uses, and other entertainment and open space uses in the HPSP area. No other changes to the existing environmental setting related to land use and planning would occur under the Adjusted Baseline Environmental Setting.

#### 4.9.6 THRESHOLDS OF SIGNIFICANCE

A significant land use impact would occur if the proposed Project would result in the following:

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**Threshold LU-1**      **Physically divide an established community.**

**Threshold LU-2**      **Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.**

The first threshold applies to projects that would create physical barriers which would create divisions to existing connections between parts of a community. Physical divisions in a community could be created if connectivity between areas of the existing community is substantially affected. Physical division can also occur if the connectivity between areas of an existing community is reduced to the extent that one portion of a community would be physically separated from the rest of the community.

The second threshold addresses consistency with applicable land use plans and focuses on potential conflicts between the proposed Project and existing land use plan, policies, and regulations adopted to avoid or mitigate environmental effects. Determinations of significance are not based on inconsistency alone, but on instances where inconsistencies with plans, policies, and regulations would also result in physical impacts on the environment.

A project is considered to be consistent with a general plan and related planning documents if, considering all its aspects, it would further the objectives and policies of the plan or not obstruct their attainment. If a project is determined to be inconsistent with specific individual objectives or policies but is largely consistent with the land use or the other goals and policies of that plan and would not preclude the attainment of the primary intent of the land use plan, the proposed Project would not be considered inconsistent with the plan.

Inconsistency with a land use or planning policy is not necessarily considered to be an impact under CEQA; only those inconsistencies that result in physical effects on the environment are considered a significant impact to the environment as defined by CEQA. The proposed Project is considered to be consistent with the goals of regional and local plans if it meets the general intent of the plans and would not preclude the attainment of the primary intent of the land use plan or policy. Policies that do not result in physical impacts represent factors that the Lead Agency and Responsible Agencies would consider in their planning reviews of the proposed Project.

Thresholds and analysis relevant to land use compatibility, including consistency with applicable plans, in terms of views, air quality, noise, and surface transportation are addressed in **Sections 4.1: Aesthetics, 4.2: Air Quality, 4.10: Noise, and 4.12: Transportation**, respectively.

## 4.9.7 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

### 4.9.7.1 Project Characteristics

The proposed Project is an approximately 1.6-miles long, elevated ATS system with associated support facilities, primarily located within the public right-of-way along Market Street, Manchester Boulevard, and Prairie Avenue, with limited encroachments currently outside of the public right-of-way onto private property to be acquired as part of the Project. Three stations would be located along the proposed Project alignment as follows:

- Market Street/Florence Avenue station (at the site of the existing retail commercial center) generally proposed between Florence Avenue and Regent Street providing connections to the Metro K Line and downtown Inglewood;
- Manchester Boulevard/Prairie Avenue station proposed on the southwest corner of Manchester Boulevard and Prairie Avenue providing a connection to the Forum, and Los Angeles Stadium & Entertainment District (LASED) at Hollywood Park, and
- Prairie Avenue/Hardy Street station proposed on the northwest corner of Prairie Avenue and Hardy Street providing connections to the LASED at Hollywood Park, including SoFi Stadium, and the Inglewood Basketball & Entertainment Center (IBEC).

Each station is configured with center station platforms to minimize the total footprint of the station and guideways while providing ease of passenger wayfinding.

The ATS guideways would consist of dual lanes, with each lane approximately 14 feet wide, and widths varying from 30 feet to 75 feet to accommodate stations and turn-back switches. The guideway is supported by columns ranging in size from approximately 6 feet by 9 feet to 6 feet by 12 feet in diameter depending on the locations, spacing and guideway configuration.

Existing roadways and infrastructure along the guideway would require some reconfiguration to accommodate new elevated transit 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. The roadway reconfigurations along Market Street, Manchester Boulevard, and Prairie Avenue are necessary to ensure that the existing number of travel lanes is maintained.

The proposed Project includes a MSF, to provide regular and preventive maintenance for the ATS trains (i.e., rolling stock and equipment), vehicle storage, and an operations control center. **Figure 4.9-4: Map of Property Acquisitions and Easements** identifies the location of the proposed MSF. The MSF building would be approximately 75,000 SF and elevated from ground level to match the guideway elevation. The

ground floor would consist of a generally unenclosed space containing approximately 250 public parking spaces for the new Vons store. A gated surface parking area containing approximately 50 parking spaces for employees and visitors to the MSF will be provided west of the MSF building.

Support facilities would include two power distribution system (PDS) substations. These substations would be the service connection point and would provide the necessary power for the proposed Project including traction power, auxiliary power and housekeeping power for the stations and infrastructure. One of the PDS substations would be co-located with the MSF and another would be located at Prairie Avenue/Hardy Street Station.

Additional public parking would be provided as part of the Project at three locations:

- Approximately 650 parking spaces would be provided in a surface parking lot at the Market Street/Florence Avenue Station along with pickup and drop off areas on Locust Avenue and Regent Street.
- Approximately 50 parking spaces would be provided in a surface parking lot at 150 S. Market Street.
- Approximately 80 parking spaces would be provided in a surface parking lot at the Prairie Avenue/Hardy Street Station along with pickup and drop off areas within the lot.

### Property and Easement Acquisitions

The proposed Project is located in a highly developed urban setting containing existing residential, commercial, education, and transportation facilities. While the majority of the proposed Project would be located within the public street right of way, components of the guideway system are proposed on adjacent property which would require acquisition of property or easements. In addition, the Market Street/Florence Avenue station, MSF, the Manchester Boulevard/Prairie Avenue station, and the Prairie Avenue/Hardy Street station would require acquisitions of properties. Property and easement acquisitions are discussed below.

### Market Street Segment

The northern most station of the proposed Project is the Market Street/Florence Avenue station which would be located at 310 E. Florence Avenue, southeast of Market Street and Florence Avenue. The station would replace an existing retail commercial center containing restaurants, auto part store, cosmetology school, convenience store, and drug store. An elevated passenger walkway would connect the Market Street/Florence Avenue station with the Metro K line Downtown Inglewood Station north of Florence Boulevard.

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As the guideway continues south on Market Street, existing commercial buildings and vacant lots would line both sides of the guideway.

**Manchester Boulevard Segment**

The guideway turns east onto Manchester Boulevard which would require the guideway to extend into the adjacent property occupied by a two-story commercial building at 150 S. Market Street, located on the northeast corner of the Market Street and Manchester Boulevard intersection. The existing commercial building would be replaced by the guideway and a surface parking lot providing approximately 50 public parking spaces as part of the proposed Project.

As the guideway continues east, retail, commercial, and restaurant uses continue on both sides of Manchester Boulevard until the intersection with Manchester Drive, where churches and residential homes line the north side of Manchester Boulevard. An additional property acquisition would be required in this segment to accommodate the MSF, which would be located south of the street between Hillcrest Boulevard and Spruce Avenue, at 500 E. Manchester Boulevard on the eastern portion of this site. This site is developed with Vons grocery store building (which includes a separate gym) and gas station. A new Vons replacement store would be developed on the northwest portion of this site. Other uses located within the grocery store include a bank branch and coffee shop which are anticipated to be included in the new Vons replacement store. A PDS substation would also be located on this property.

**Prairie Avenue Segment**

The Prairie Avenue Segment extends from the intersection of Prairie Avenue and Manchester Boulevard to just northwest of the intersection of Prairie Avenue and Hardy Street. As the guideway turns south, the Manchester Boulevard/Prairie Avenue station would be located on a vacant commercial site located on the southwest corner of Manchester Boulevard and Prairie Avenue at 401 Prairie Avenue that would be acquired as part of the Project.

As the guideway continues south, uses include a commercial office building and educational facilities west of Prairie Avenue, including a daycare center and Kelso Elementary School. Existing land use south of Kelso Street and west of the Prairie Avenue is a mix of commercial buildings and retail commercial centers, hotels, and residential buildings. East of Prairie Avenue are the Forum, SoFi Stadium, and other new development in the HPSP area.

This Prairie Avenue/Hardy Street station is proposed at the southern end of this segment on the northwest corner of Prairie Avenue and Hardy Street on property proposed to be acquired as part of the Project. This site is currently developed with a retail commercial center. Acquisition of 6 additional parcels located immediately north of the proposed station site is necessary to accommodate the switch zone north of the

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station. These parcels include 2 vacant parcels, 2 containing vacant commercial buildings and 2 containing occupied commercial buildings.

**Table 4.9-1: Anticipated Property Acquisitions And Easements** and **Figure 4.9-4** identifies parcels that would be acquired in fee (full or partial) or on which easements would be acquired to implement the proposed Project. These real property rights would be acquired by either the City of the Joint Powers Authority (JPA) to be formed by Metro and the City to implement the Project.

A detailed list of existing parcels on and adjacent to the proposed Project is provided in **Appendix M: Existing Land Use Setting for Parcels Adjacent to the ATS System**.

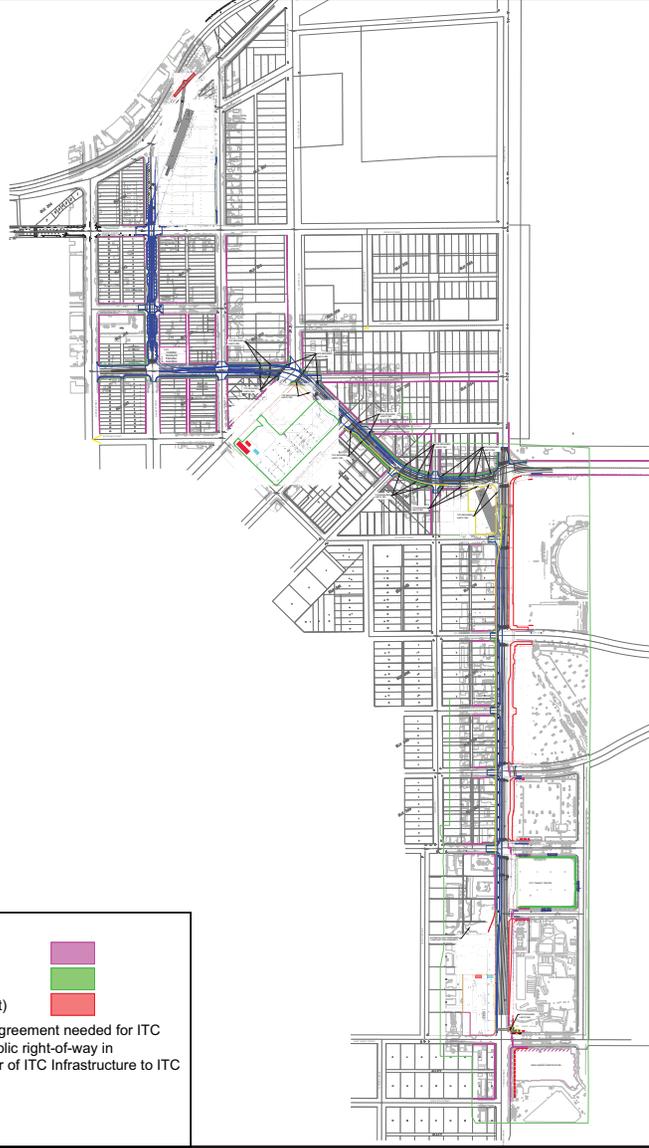


251-003-20

**NOT TO SCALE**

**Legend**  
 Full Take   
 Partial Take (Fee)   
 Partial Take (Easement)

Note: Encroachment agreement needed for ITC Infrastructure within public right-of-way in connection with transfer of ITC Infrastructure to ITC Joint Powers Authority.



SOURCE: City of Inglewood - 2021

Map of Property Acquisitions and Easements

FIGURE 4.9-4

Table 4.9-1  
 Anticipated Project Acquisitions

APN #	Property Address	Existing Use/Primary Business	Anticipated Acquisition Type	Project Needs
4015-019-902	317 E. Florence Ave	Future Downtown Inglewood Station of Metro K Line	Easement or partial acquisition	Market Street/Florence Avenue Station elevated passenger walkway connection
4015-019-904	319 E. Florence Ave	Future Downtown Inglewood Station of Metro K Line	Easement or partial acquisition	Market Street/Florence Avenue Station elevated passenger walkway connection
4015-019-905	325 E. Florence Ave	Future Downtown Inglewood Station of Metro K Line	Easement or partial acquisition	Market Street/Florence Avenue Station elevated passenger walkway connection
4015-019-906	327 E. Florence Ave	Future Downtown Inglewood Station of Metro K Line	Easement or partial acquisition	Market Street/Florence Avenue Station elevated passenger walkway
4015-019-907	333 E. Florence Ave	Future Downtown Inglewood Station of Metro K Line	Easement or partial acquisition	Market Street/Florence Avenue Station elevated passenger walkway
4015-027-030	310 E. Florence Ave	Restaurant - Antojitos Martin (Shack & Juice Bar)	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-031	300 E. Florence Ave	Restaurant- Fiesta Martin Bar and Grill	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-032	254 N. Market St	Small Businesses and Restaurants - House of Tacos, Water 4 U, Baja Inc. Mailbox Rentals, Amar's Wholesale Flowers, New Orleans Breakfast Take Out	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-033	250 N. Market St	O'Reilly Auto Parts	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-035	236 N. Market St	Parking Lot	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-020	234 N. Market St	Parking Lot	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-042	Address Not Available	Parking Lot	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-022	226 N. Market St	Parking Lot	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-052	Address Not Available	Parking Lot	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking

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APN #	Property Address	Existing Use/Primary Business	Anticipated Acquisition Type	Project Needs
4015-027-051	200 N. Market St	No Existing Business; Abandoned Building	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-038	240 N. Market St	Small Businesses – Silk Nails, Advance America, Ingewood Optometric Center, Ingewood Beauty Supply, Ingewood Beauty Salon	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-040	230 N. Market St	Clothing Store - DD's Discounts Store	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-041	224 N. Market St	GMD Store (general department store)	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-049	222 N. Market St	CVS Pharmacy	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4015-027-050	210 N. Market St	Westchester Dental Care, Randy's Donuts and Chinese Foot To-Go, Luxe Gold Salon, Citifund Tax Financial & Notary / Selwyn's Jewelry / Senior Corner	Full Acquisition	Market Street/Florence Avenue Station, vertical circulation, guideway, columns, construction staging, and future parking
4021-010-901	Address Not Available	Parking Lot	Full Acquisition	Construction staging and future parking
4021-010-015	150 S. Market St.	World Hit and Boot Mart / Commercial	Full acquisition	Guideway, columns, construction staging, and future parking
4021-024-015	500 E. Manchester Blvd.	Retail Commercial Center with Gas Station, Planet Fitness, and Vons grocery store (with Starbucks and US Bank branch located inside Vons)	Partial Acquisition	Maintenance and Storage Facility, guideway, power distribution system substation, construction staging, and future parking
4021-036-049 4021-036-027	401 S. Prairie Ave.	Vacant	Full Acquisition	Prairie Ave./Manchester Blvd. Station, guideway, construction staging, and future parking
4024-008-015	923 S. Prairie Avenue	Vacant Buildings/Surface Parking Lot	Easements or partial acquisition	Guideway and construction staging
4024-009-004	937 S. Prairie Avenue	Vacant/Undeveloped	Easements or partial acquisition	Guideway and construction staging
4024-009-003 4024-009-005	945 S. Prairie Avenue	Retail Commercial/Restaurant	Full acquisition, partial acquisition, or easements	Guideway and construction staging
4024-009-007	1003 S. Prairie Avenue	Office-Warehouse/Peak Performance Training Center	Full acquisition, partial acquisition, or easements	Guideway and construction staging

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APN #	Property Address	Existing Use/Primary Business	Anticipated Acquisition Type	Project Needs
4024-009-008	1007 S. Prairie Avenue	Vacant/Undeveloped	Full acquisition, partial acquisition, or easements	Guideway and construction staging
4024-009-015	1011 S. Prairie Avenue	Vacant Buildings/Surface Parking Lot	Full acquisition, partial acquisition, or easements	Guideway and construction staging
4024-009-033	1035 S. Prairie Ave.	Retail Commercial Center with several restaurants, nail/hair salons, retail commercial businesses, tax service, medical office	Full Acquisition	Prairie Ave./Hardy St. Station, power distribution system substation (potential), vertical circulation, guideway, columns, construction staging, and future parking
4025-001-002	3900 W. Manchester Blvd.	The Forum (parking) Commercial Recreation	Easement or partial acquisition	Roadway, sidewalks, and parkway, and elevated passenger walkway connection from Prairie Ave./Manchester Blvd. Station
4025-011-064	600 S. Prairie Ave.	Parking Lot	Easement or partial acquisition	Up to 30' for roadway, sidewalks, and parkway
4025-011-065	600 S. Prairie Ave.	Parking Lot	Easement or partial acquisition	Up to 30' for roadway, sidewalks, and parkway
4025-011-901	Address Not Available	City of Ingewood Intermodal Transit Facility	Easement or partial acquisition	Roadway, sidewalks, and parkway
4025-011-086	Address Not Available	Parking Lot	Easement or partial acquisition	Up to 30' for elevated passenger walkway connection to Prairie Avenue/Hardy Street Station, roadway, sidewalks, and parkway.

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### ***ITC Design Standards and Guidelines***

The ITC Design Standards and Guidelines (Design Guidelines) (see **Appendix C**) identify the objectives for the various project components and provides design guidance to help achieve the objectives. The Design Guidelines include instructions on the project component dimensions, characteristics, and construction methods to better integrate the proposed Project with existing resources and nearby communities.

#### **Guideline Objectives**

##### ***ATS Guideway***

The guideway would have a significant presence on the streets where it is located, connecting the major entertainment centers with each station. The guideway would be simple and streamlined and will be a unifying feature between stations. The guideway architecture will create a sense of movement that connects the stations.

##### ***Stations***

The stations would be the architectural focal points within the design of the proposed Project. Stations will be identifiable, distinctive, and streamlined. The massing of the stations will be sleek and modern. The station canopies will be distinctive, yet designed in a manner not to detract from the surrounding environment.

##### ***Maintenance and Storage Facility***

The MSF will be easily accessible by employees who serve and maintain ATS trains. It will be simple and modern in style and rectilinear in form with complimentary lighting, finishes, landscaping and color palette. Screens will be provided to shield all exterior equipment including equipment at the rooftop and ground level, so that it is not visible from the street or accessible areas of adjacent properties. Sufficient area for landscape will be provided in order to integrate the facility site perimeter with the urban environment. The building exterior would be covered in a uniformed and neutral color, with accent colors, where appropriate, to allow proper integration of the structure with the environment existing visual character of the area. Additionally, the Design Guidelines would require trees and new landscaping as feasible to provide shade and decorative separation of parking spaces. Passenger walkways surrounding the site would comply with local standards and guidelines with street trees planted around the site for aesthetic appeal and to separate the MSF building from surrounding uses.

##### ***Streetscape***

Roadway and street related designs would establish a framework and overall vision for the streetscape. Building upon proposed development within the Inglewood downtown and areas adjacent to the ATS, the

streetscape improvements associated with the proposed Project would add additional pedestrian facilities, active transportation, and aesthetics.

The public right-of-way includes the roadway, the bicycle network, and the sidewalk area. The goals for the roadways, streetscape, and pedestrian connections are to create an attractive and functional environment for the users and seek to create well defined edges between the pedestrian and the vehicle realm, to use a hierarchy of spaces that help define the use of the public realm, and to improve the passenger experience through clarity of circulation and wayfinding.

##### ***Pedestrian Network and Streetscape***

The pedestrian network would connect buildings, streets, parking areas, and the Project stations to create an environment that supports all modes of transportation. Sidewalks are a fundamentally important component of the area's pedestrian circulation network. Sidewalks provide pedestrian access to virtually every activity and provide critical connections between other modes of travel (automobile, public transit, bicycles, etc.) to land uses in the area. The pedestrian zone would be of adequate width to accommodate pedestrians, including those with disabilities while providing pedestrian connections to the ATS stations.

Under the Design Guidelines, streetscape in downtown Inglewood would be consistent with the street furnishings which currently exists on Market Street and the historic core and in accordance with the Downtown TOD Plan.<sup>25</sup> Existing furnishings on Market Street includes waste baskets, light posts, sidewalk posts, and street chairs spread across the downtown area on sidewalk areas. Street furnishings and street trees would be consistent with the Design Guidelines, which provide trees planted on Market Street will be planted at a rhythm and scale to create a continuous visual canopy over the pedestrian realm, where feasible.

For the streetscape adjacent to HPSP on Prairie Avenue, the Design Guidelines require trees on the west side of Prairie Avenue to be spaced to match the spacing on the east side of Prairie Avenue and the guideway support structure to the extent feasible. The HPSP streetscape plan is designed to achieve a diverse urban forest, to integrate Hollywood Park with the adjoining urban fabric and to assist in developing districts of distinctive and appropriate character. Street trees selected for Prairie Avenue are based on recommendations from local arborists to create a palette of horticulturally successful, low maintenance and climate-appropriate tree species.<sup>26</sup> Tree selections on Prairie Avenue under the design guidelines of the HPSP are Afghan Pine, Camphor Tree, Southern Magnolia, and Canary Island Pine trees.

<sup>25</sup> City of Inglewood. Inglewood Municipal Code. Section 12-38.50. T-C Zone. Permitted Uses. [https://qcode.us/codes/inglewood/view.php?topic=12-17\\_2-12\\_38\\_50&frames=on](https://qcode.us/codes/inglewood/view.php?topic=12-17_2-12_38_50&frames=on).

<sup>26</sup> City of Inglewood. Inglewood Municipal Code. Section 12-38.50. T-C Zone. Permitted Uses. [https://qcode.us/codes/inglewood/view.php?topic=12-17\\_2-12\\_38\\_50&frames=on](https://qcode.us/codes/inglewood/view.php?topic=12-17_2-12_38_50&frames=on).

Prairie Avenue adjacent to HPSP would also accommodate residential and retail gateways to the development and HPSP identifying elements with the goal of accommodating and providing architectural features, landscaping, graphic elements, special pedestrian or automobile paving, special night lighting effects or other similar features that complement the HPSP development.

Overall, the streetscape design would build upon proposed development within downtown Inglewood and adjacent to the ATS. The goals for the roadways, streetscape, and pedestrian connections in the Design Guidelines include creating a cohesive, attractive, and functional environment for the users and seeking to create well defined edges between the pedestrian and the vehicle realm. A hierarchy of spaces would also be created to define the pedestrian space and improve passenger circulation and wayfinding experience.

#### **Parking**

The proposed Project includes parking lots at three locations: The Market Street/Florence Avenue Station, 150 S. Market Street, and the Prairie Avenue/Hardy Street Station. The Market Street/Florence Avenue Station site would include pick up and drop off areas on Locust Avenue and Regent Street and a surface parking lots containing approximately 650 public parking spaces. The surface parking lot at 150 S. Market Street would contain approximately 50 public parking spaces, and the surface parking lot at the Prairie Avenue/Hardy Street Station would contain approximately 80 public parking spaces. Planting zones will be provided to separate parking stalls from sidewalks with trees that would be planted at a minimum ratio of one tree per 10 parking spaces, not including the trees along the street edge of the parking lot.

In addition, the City is considering building a parking structure on the City's Inglewood Transit Facility (ITF) site located on the southeast corner of Prairie Avenue and Arbor Vitae Street within the HPSP area. This parking structure would provide additional public parking near event venues in the LASED and for the IBEC. The ITF site is currently improved as a surface parking lot and bus transit facility. This planned parking structure would provide up to 2,500 parking spaces in a six-level building. While this proposed parking facility would be located within the HPSP area and is not proposed as part of the Project, it is analyzed as part of the potential circulation system in which the Project will operate.

#### **Construction Commitment Program**

The Construction Commitment Program (CCP) (**Appendix D**) identifies construction practices that would be implemented during construction of the proposed Project to address potential impacts associated with construction activities. These include measures to avoid or reduce adverse impacts of the proposed Project to environmental resources and the surrounding communities. Construction measures included in this Program address:

- Business and community support plans, including a business assistance fund
- Construction staging and traffic control requirements
- Maintaining access to parking, businesses, residences, and pedestrian facilities
- Noise and vibration measures
- Air quality measures
- Other vital measures during construction

#### **General Plan Amendment**

The proposed Project includes proposed amendments to the General Plan Land Use, Circulation, and Safety Elements as described below to reflect the addition of this transit system to the City's circulation system. No changes are proposed to the other elements of the General Plan including the Housing, Conservation, Noise, Open Space, and Environmental Justice Elements.

#### **Land Use Element**

The amendment to the General Plan Land Use Element would change the text and diagrams related to the three components as described below.

First, the Goals and Objectives section would be modified to incorporate the ITC Project into the subsections addressing Circulation and the Downtown Transit Oriented District. The modified objectives address integration of the ATS system into the existing area around Market Street, connecting the Downtown Inglewood Metro Rail station to the LASED including SoFi Stadium, the Forum, and the IBEC with the ITC Project, and supporting the City's goal to promote adequate public transportation within the City and the region by adding the ITC Project.

Second, a description of the proposed ITC Project would be added to the "Passenger Train Service" subsection under the "Development Factors-Transportation Network" section. The subsection provides a list of passenger train services available in the City of Inglewood.

Third, the "Downtown Transit Oriented District" subsection in the "Future Land Uses" chapter would be amended to identify the proposed Transportation Corridor Overlay Zone (TC Overlay Zone) as one of the overlay zones in Downtown Inglewood. The TC Overlay Zone would take precedence over or supersede, as necessary, all other zones, including overlay zones, in the Project area, including the concept plans and zoning and design guidelines outlined by the Downtown TOD Plan.

#### **Circulation Element**

The amendment to the General Plan Circulation Element would include changes to text and diagrams related to the four components described below.

First, Market Street, between Florence Avenue to the north and La Brea Avenue to the south, would be revised from its current configuration to have one lane of traffic in each direction between Regent Street and Manchester Boulevard with a center island; currently this section of Market Street has two lanes in each direction with a center turn lane. The Circulation Element currently classifies Market Street as a Minor Arterial street. Minor Arterial streets contain two lanes of traffic in each direction. This section of Market Street would be reclassified as a Collector street; Collector streets have one lane of traffic in each direction.

The Circulation Element identifies typical street sections for common right-of-way widths and sections of streets planned for widening. The second component of the proposed amendment includes defining the maximum right of way for Prairie Avenue, between Manchester Boulevard to the north and Hardy Street to the south, as 132 feet.

Third, a description of the proposed Project, including its connection to the Metro K Line, would be added to the description of light rail facilities in the City.

Fourth, changes to the descriptions of the street environment, parkways, medians, and on-street parking on Market Street, Manchester Boulevard, and Prairie Avenue that would be affected by the Project would be made.

#### Safety Element

The Safety Element would be amended to include descriptions of the proposed Project components including the guideway, stations, MSF and PDS substations. Specifically, the proposed Project would be added to the element as a Critical Facility. The description of transportation routes would be updated to incorporate the presence of proposed Project components along its alignment.

#### Transportation Corridor Overlay Zone

An amendment to Chapter 12, Planning and Zoning, of the IMC is proposed to add a Transportation Corridor Overlay Zone (TC Overlay Zone) that would apply to the proposed Project areas. The intent of the TC Overlay Zone is to define specific uses and development standards applicable to the proposed Project as the standards in the underlying zones are not applicable to an elevated guideway, stations, or various other components of the proposed Project infrastructure. The TC Overlay Zone standards would supersede or take precedence over the standards of the zones underlying the TC Overlay Zone footprint, but only with respect to the proposed Project elements; the standards of the underlying zones would continue to govern existing and future development of non-Project elements.

The TC Overlay Zone defines the uses permitted in this overlay zone area along with supplemental development standards and design guidelines. The boundaries of the proposed TC Overlay Zone are

shown in **Figure 4.9-5: Transportation Corridor Overlay Zone**. The TC Overlay Zone area includes the guideway, stations, and all related support facilities.

The permitted uses for the TC Overlay Zone would be modeled upon, and expand upon, those contained in the City's existing Transportation Corridor (T-C) Zone described in Section 12-38.50<sup>27</sup> of the IMC, which provides the zoning framework for the Metro K Line within the City, with adjustments made to accommodate the elements necessary for the ITC Project including, without limitation, an above-grade guideway, the MSF, the multilevel stations, vertical circulation elements, and connecting walkways and bridges, and all of the related supporting facilities and infrastructure. The proposed TC Overlay Zone would allow the following as permitted uses (the TC Overlay Zone Uses):

- The construction, operation and maintenance of any at-grade or elevated fixed guideway transportation system, including, without limitation, light rail (which may consist of an automated people mover system, automated guideway transit, monorail, and/or any other comparable system that may be steel-wheel/steel rail, rubber tired or magnetically levitated, supported on rail(s) from below, straddling, or suspended from overhead beam(s) from above), trolley, busway (including rapid transit), and/or comparable transit or transportation system, including public and private rights-of-way, easements, underground utilities, tracks, spurs, guideways, footings, support columns, support beams, and any appurtenant facilities, improvements, and equipment, including stations (which may be at-grade or elevated and comprised of one or multiple levels), maintenance facilities, storage facilities, operations control centers, related administrative and office facilities, restrooms, vertical and horizontal circulation elements (such as stairs, escalators, elevators, and passenger bridges and walkways), plazas or similar open space areas, platforms, signals, utility and storage areas, power distribution elements, electrical or traction power.
- Substations, rolling stock, and the like, which are necessary and related to the operation, maintenance, and security of the transportation system.
- Parking facilities (surface, subsurface, or structured) for transportation facilities (including such facilities' employees and users) or for use by adjacent or nearby businesses or public facilities.
- Mobility hubs (which may be co-located with parking facilities) and multimodal pick-up and drop-off facilities.
- In conjunction with the uses permitted above, property in the TC Overlay Zone may be landscaped and otherwise improved with ornamental fencing, ornamental lighting, directional and informational signage, public information and communications signage systems and all related facilities, fiber optics, emergency lighting, security systems, rest areas and seating, café or food service carts, service kiosks or structures, retail, and other similar streetscape improvements, public amenities or other uses typically found in public transit stations.

<sup>27</sup> City of Inglewood. Inglewood Municipal Code. Section 12-38.50. T-C Zone. Permitted Uses. [https://qcode.us/codes/inglewood/view.php?topic=12-17\\_2-12\\_38\\_50&frames=on](https://qcode.us/codes/inglewood/view.php?topic=12-17_2-12_38_50&frames=on).

- Station sites and maintenance or storage facility sites in the TC Overlay Zone may be jointly developed with station facilities and commercial, residential, public facility, or mixed uses.
- As interim uses only during periods of construction, construction staging and laydown (including storage of all equipment and materials), fencing, construction-related office, and employee space (which may include restrooms and a canteen and/or food vendor area), interim parking, and ancillary temporary structures and any other temporary uses approved by the Director of Public Works as reasonably related to any of the foregoing temporary or permanent uses or otherwise in the public interest.

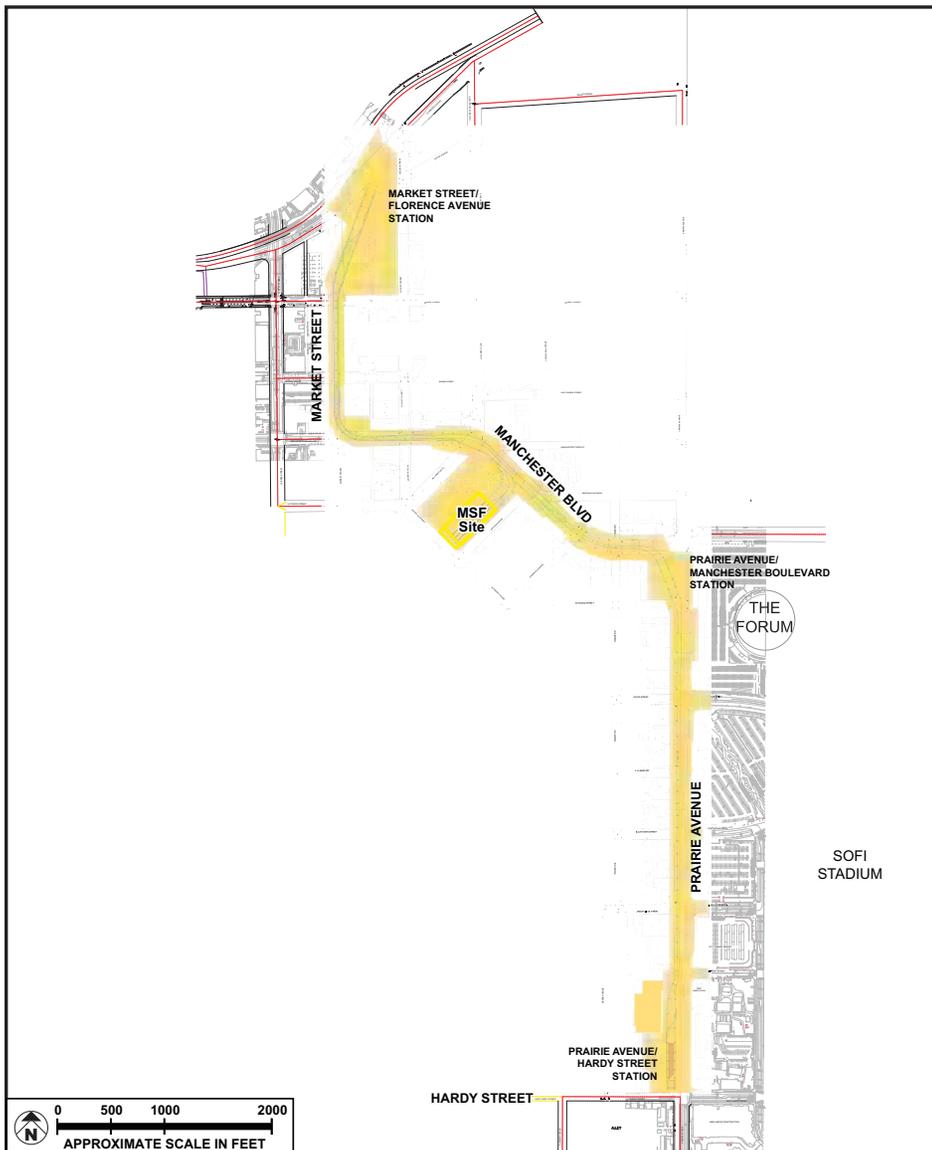
Development of the TC Overlay Zone Uses within the TC Overlay Zone will be subject to the Inglewood Transit Connector Standards and Design Guidelines (Design Guidelines). The Design Guidelines provide design guidance for each component of the Project (e.g., guideway, stations, parking lots) and define the City's review and permitting process for the development of the TC Overlay Zone Uses in the TC Overlay Zone area. With respect to such uses only, the Design Guidelines will supersede the standards in the Inglewood Municipal Code, the Downtown Inglewood and Fairview Heights Transit Oriented Development Plan, and the Hollywood Park Specific Plan, as well as any other design, plan review, or permit process described in any of the foregoing documents (including the Site Plan Review process in Article 18.1 in Chapter 12). Compliance with the review process as specified in the Design Guidelines will be required prior to the issuance of building permit(s) for development of the TC Overlay Zone Uses, and the review will require consistency with the assumptions in this EIR.

The Design Guidelines will include standards for design, features and design elements for buildings, structures, transit system elements, streetscapes, landscaping, lighting, parking, and sustainability.

The TC Overlay Zone would also define development standards applicable to these permitted uses including the following:

- A height limit of 110 feet for station sites, 75 feet for the MSF site, and 75 feet for all other improvements, structures, and elements of the proposed Project, which include the guideway. These are height limits calculated above finished grade.
- No minimum setbacks (0' setback).
- No minimum street frontage requirements.
- Parking and public art requirements as specified in Design Guidelines.

The TC Overlay Zone would specify that any area within the zone, previously used to satisfy a minimum setback requirement in the underlying zone, will still continue to be treated as a legal setback area and shall continue to be counted for purposes of any permitted density or floor area calculations under the underlying zone for existing and future development purposes.



SOURCE: Meridian Consultants LLC - 2021

FIGURE 4.9-5

Transportation Corridor Overlay Zone



The TC Overlay Zone boundaries would be coterminous with the proposed Project footprint and would also extend up to 50 feet from the edge of the guideway and outside edge of the stations along the entire alignment of the guideway.

### **Medical Enterprise Overlay Zone**

As part of the Project, the City would amend the Medical Enterprise Overlay Zone in Chapter 12, Planning and Zoning, Article 5.1. "R-M" Residential and Medical Zone Regulations of the IMC [IMC §12-22.29] to exclude properties within the Project Site from the Medical Enterprise Overlay Zone. The TC Overlay Zone would apply to these properties.

The Medical Enterprise Overlay Zone applies to R-M (Residential) and C-2 (General Commercial) zoned properties located in Planning Area One and Planning Area Two. Planning Area One includes properties that are zoned R-M and located to the north of Manchester Boulevard and those C-2 zoned properties adjacent to the west side of Prairie Avenue that are located between Florence Avenue to the north and Manchester Terrace to the south. Planning Area Two includes properties that are zoned R-M and located to the south of Manchester Boulevard and those C-2 zoned properties adjacent to the west side of Prairie Avenue that are located between Manchester Boulevard to the north and Hardy Street to the south.

Currently, the Medical Enterprise Overlay Zone applies to the proposed sites for the Prairie Avenue/Manchester Boulevard and Prairie Avenue/Hardy Street stations and associated components of the Project on the west side of Prairie Avenue not located within the public right-of-way.

### **Hollywood Park Specific Plan Amendment**

To accommodate the ATS while maintaining the existing roadway capacity along Prairie Avenue, the ITC Project includes the proposed relocation of one existing traffic lane on the east side of Prairie Avenue. The relocated lane would be accommodated within a variable easement for street purposes, to be acquired by the City over private property that currently comprises the existing required 30-foot setback area along the west edge of the HPSP area. While existing sidewalk widths along Prairie would be maintained, landscaping, signs and other streetscape improvements would need to be reduced or eliminated in certain areas following the property acquisition. To address any potential conflict or inconsistency with the HPSP, the City is proposing the following specific plan amendments and clarifications to the HPSP:

- The elimination of the requirement for a 30-foot setback area along the western edge of the HPSP area (30-foot Setback Area) to allow zero-lot line development. Accordingly, future buildings and structures within the western edge of the HPSP area would be permitted to be built along the existing property line without requiring any additional setback along Prairie Avenue. Subterranean parking

and certain structures, such as balconies, would be allowed to encroach within the City's easement areas, to minimize the loss of the setback area for future development purposes. Consistent with the proposed TC Overlay Zone, any area previously used to satisfy the minimum setback requirement shall continue to be counted within any density or Floor Area Ratio calculations under the Specific Plan, for existing and future development purposes, even though it may have been dedicated as a public right-of-way.

- The landscape area within the 30-foot Setback Area will be reduced or eliminated in certain areas, as needed to accommodate the new street easement.
- New areas where signs will be allowed will be proposed to support the replacement and relocation of existing monument and wayfinding signs currently located within the existing 30-foot Setback Area.
- To support the attractiveness of the ITC Project and increase the transit mode share to the HPSP area, the City proposes to improve public safety, enhance the pedestrian circulation system and pedestrian experience to the event and activity centers at Hollywood Park by allowing for routine closures of 2 interior streets on event days to reduce pedestrian conflicts with vehicles within designated areas. Accordingly, to facilitate pedestrian-only pathways on event days, the City proposes to amend the Specific Plan to designate Champions Way and Touchdown Drive as private streets and no longer require their public dedication (excluding subsurface, wet, dry and fiber utilities) to the City.

Other amendments will be considered together with the HPSP owner, as necessary, for implementation of the Project and coordination with existing and future HPSP development.

### **The Forum**

To accommodate the ATS while maintaining the existing roadway capacity along Prairie Avenue, the ITC Project includes the proposed relocation of one existing traffic lane on the east side of Prairie Avenue. The relocated lane would be accommodated within a maximum 30-foot variable easement along the Forum property for street purposes. The Project will also include a pedestrian connection from the proposed Prairie Avenue/ Manchester Boulevard Station, which may also eliminate some parking at the Forum site. The City would acquire a 30-foot easement over the Forum private property and could potentially eliminate some parking spaces on the Forum site along the Prairie Avenue edge of the property to accommodate the Project. The City would continue to acknowledge that the parking for the Forum would be legally non-conforming with implementation of the ITC Project, and the Forum Development Agreement would be updated accordingly. Finally, the existing marquee sign for the Forum located in Prairie Avenue may be adjusted as necessary to accommodate the proposed lane relocation and ITC infrastructure while maintaining the prominence and visibility of this existing sign.

### **Vons Grocery Store Relocation**

To accommodate the MSF while maintaining a Vons supermarket at or near its current location, the ITC Project includes the phased relocation of the current Vons supermarket to a new location on the same parcel and the removal of the current gas station located at the site. The City would acquire a portion of the existing site while also accommodating supermarket parking under the elevated MSF building. A City Planning Commission approval of a Special Use Permit is required for demolition of the gas station [IMC §12-63(a)], Planning Commission approval of Design Review is required for the new supermarket store [TOD Plan §4.5], and approval of a Site Plan Review by the Planning and Building Department Director is required for the new supermarket store [IMC §12.39-50 et seq.]. Other discretionary permits and approvals may be necessary to support the construction and operation of a new supermarket store and/or the removal of the current gas station. During construction, the City would permit the existing and new grocery store to operate with less than the amount of parking required by the City's municipal code. In addition, any current legal non-conforming uses associated with the existing grocery store, including, but not limited to, alcohol sales would be permitted to continue as legal non-conforming uses.

#### **Impact LU-1: Would the project physically divide an established community?**

Physical divisions in a community could be created if connectivity between areas of the existing community is substantially affected. Physical division can also occur if the connectivity between areas of an existing community is reduced to the extent that one portion of a community would be physically separated from the rest of the community.

#### **Construction**

Construction of the proposed Project could divide the existing community by reducing vehicular, bicycle, and pedestrian access within the Project area due to lane closures and impacts on the circulation system. However, implementation of the CCP (**Appendix D**) would ensure that access to project adjacent sites would be available to the public with minor inconveniences. The Construction Staging and Traffic Control Program required by the CCP would prioritize maintaining a minimum of one travel lane in each direction on streets affected by construction activities. In the event that a complete road closure would be required, a detour route would be reviewed and approved by the City and public notice will be provided regarding the closure and the detour route. The detour route will allow for continued access to areas affected by project construction.

To minimize impacts on surrounding communities, construction staging would largely take place on parcels outside the existing right of way, limiting impacts on circulation. Staging would also comply with any City issued permits and be reviewed by the City prior to its implementation.

Although construction activities during Phases 5 and 6 would occasionally pose physical barriers to connections on Market Street or Manchester Boulevard, the physical barriers would be temporary and measures within the CCP would be provided to minimize transportation impacts that may arise from temporary street closures.

The CCP includes the measures described below to minimize traffic interruptions during construction. Implementation of the Construction Staging and Traffic Control Program will maintain pedestrian and vehicular access throughout construction of the Project. Other measures included in the CCP, including the Business and Community Support Program and Business Interruption Assistance Program, will also minimize the effects of the construction of the Project on the community. While construction of the Project will result in temporary disruptions, construction of the Project will not create a physical division of the community that will result in a significant land use impact

The requirements set forth in the CCP, including the Transit Access and Circulation Program (CCP, Section 5.0), the Construction Staging & Traffic Control Program (CCP, Section 6.0), and the Business and Community Support Program (CCP, Section 2.0) and Business Interruption Assistance Program (CCP, Section 3.0) (see **Appendix D**) would continue to allow access within the Project area, including access to businesses at all times, and transportation related inconveniences would be reduced to the extent feasible and provide additional support for businesses. Efforts would be made to keep all traffic lanes open for peak directional travel. If all lanes cannot remain open, one lane would be kept open for peak direction and supplemented by detour options. Advanced notice of road closures and detours would be provided to the City and the community.

Measures to minimize transportation impacts are not limited to private vehicles. Bus stop relocation and bicycle/pedestrian detours facilitates access by other modes of transportation and ensures continued operation and connectivity to nearby communities. Multimodal access to local businesses would be maintained throughout construction.

While access to some neighborhoods would be disrupted and detoured for short periods of time during construction, through implementation of the CCP access would continue to be available to neighborhoods for both residents and emergency response. In addition, the funding assistance provided as part of the CCP's Business Interruption Assistance Program would avoid indirect impacts on existing businesses from construction of the ITC Project. For these reasons, the proposed Project would not physically divide the existing community during construction and this impact is less than significant.

Additional construction impact analysis including aesthetics, air quality, noise and vibration, and traffic, can be found in **Sections 4.1, 4.2, 4.10, and 4.12.**

### Operation

The proposed Project will extend service from the Metro K line to the major event venues and existing and planned residential and commercial uses in the City, facilitating regional transit connectivity across the greater Los Angeles region. Both the guideway and the stations will be elevated and the guideway will be primarily located within public right-of-way for the length of the proposed Project. Existing uses adjacent to the proposed Project include commercial, single, and multifamily residential, and entertainment uses.

As discussed below, the proposed Project guideway and stations would be elevated to minimize access impacts to adjacent land uses and ground transportation. The ATS guideway and support columns will change the physical characteristics of the streets it is located on, including affecting the views of buildings along these streets. These streets are existing transportation facilities that are a feature of the community, and the additional ATS infrastructure does not reduce capacity of these streets and does not block access to existing structures or residential or commercial uses along the alignment. Stations would be designed to provide easy access for pedestrians to and from the station and adjacent streets. The proposed support facilities for the ATS system, such as the MSF, would not be constructed on existing transportation facilities and would be contained within designated parcels without physically dividing the community. Therefore, operation of the proposed Project will have a less than significant impact on access and will not introduce features on these streets that will physically divide the community.

### Market Street Segment

The Market Street/Florence Avenue station footprint would be entirely contained within the 9-acre site and will not contribute to physically dividing the surrounding community.

The elevated guideway would travel south from this station on Market Street until the intersection with Manchester Boulevard. Since the guideway will be elevated and located with a minimum clearance of 16 feet 6 inches from the street and located within the existing street the columns for the guideway and other associated components of the system would not introduce physical features that will form a physical barrier. While the ATS guideway and support columns would change the physical characteristics of this segment of Market Street and would affect the views of buildings along the street, the Project will not introduce features that would physically divide the community.

As identified in *Section 4.9.4: Existing Conditions*, adjacent to this segment are commercial retail, office, restaurant, parking, and mixed-use residential uses, as well as vacant lots. The guideway will be elevated and supported by columns. The number of support columns will be minimized by providing the maximum allowable spacing between each column. Aside from the property to be acquired at the corner of Market Street and Manchester Boulevard, which is described further in *Manchester Boulevard Segment* below,

the guideway is not expected to intrude into any existing land uses or impact the existing traffic flow or pedestrian movement below the guideway footprint. No physical division of the community would occur.

An elevated passenger walkway will connect the Market Street/Florence Avenue station with the Metro K line through the Downtown Inglewood station across Florence Avenue to the north. Because the passenger walkway will be elevated, it will not interfere with access to existing neighborhoods and would not physically divide an existing community.

### Manchester Boulevard Segment

The Manchester Boulevard segment begins at the intersection of Market Street and Manchester Boulevard and continues east until the intersection of Manchester Boulevard and Prairie Avenue. The Manchester Boulevard roadway is bordered by commercial retail, office, churches, mixed-use and residential uses on both sides of the street. As the guideway turns east on Manchester Boulevard, the guideway will extend into the property located at 150 S. Market Street. This property contains a two-story commercial building that will be acquired and demolished to allow construction of the guideway.

Similar to the Market Street segment, the guideway will be constructed primarily within the current Manchester Boulevard right-of-way. The number of support columns for the guideway will be minimized by providing the maximum allowable spacing between each column and the guideway would not pose a physical barrier except for the occasional columns support for the guideway. The columns will be spaced out to the maximum extent feasible to minimize visual and land use impacts for nearby right of way and properties.

The MSF will be constructed within the Manchester Boulevard segment, located southwest of Manchester Boulevard between Hillcrest Boulevard and Spruce Avenue, at an existing commercial center containing a Vons grocery store. This commercial center would be acquired and the existing buildings demolished to accommodate both the MSF on the eastern portion of the site and a new Vons grocery store will be reconstructed on the northwest portion of the site. The MSF building would be elevated to match the track elevation. One PDS substation will be co-located on the MSF site. Since the MSF site will be entirely contained within the existing commercial center site, the structure will not physically divide the existing community or impede access to local businesses, amenities, and residential uses. Existing traffic circulation will continue to operate around the MSF site without physical obstructions.

Neither the elevated guideway nor the MSF site will physically divide the community by limiting local access or obstructing traffic. The guideway and support columns will be located above the roadway within the proposed median and will not introduce physical features that will form a physical barrier. While the ATS guideway and support columns would change the physical characteristics of this segment of

Manchester Boulevard, including affecting the views of buildings along the street, the Project will not introduce features that will physically divide the community.

#### **Prairie Avenue Segment**

The Prairie Avenue segment begins at the intersection of Manchester Boulevard and Prairie Avenue and continues south on the west side of Prairie Avenue until the termination of the guideway at the intersection of Hardy Street and Prairie Avenue. As the guideway turns south from Manchester Boulevard, the guideway will partially extend beyond the public right-of-way to pass through the property at 401 S. Prairie Avenue to accommodate the Prairie Avenue/Manchester Boulevard station. An acquisition of this parcel would be necessary to accommodate the station and associated support columns. This segment of the guideway would be bordered by commercial and multifamily residential uses on the west and a mix of uses on the east, including the Forum and entertainment, retail, and residential uses under development within the HPSP area.

The Prairie Avenue segment will be constructed primarily within the western edge of the Prairie Avenue right-of-way and will be adjacent to established communities to the west and entertainment centers and developing communities to the east. Acquisition of a maximum 30-foot easement will be required to reconfigure Prairie Avenue to the east and accommodate columns, sidewalk, and existing number of travel lanes. Similar to other segments, the guideway, located on the west side of Prairie Avenue, will be elevated, at least 4 feet from adjacent buildings, and spaced out to the extent practical to limit the number of columns. Existing traffic flow below the guideway structure will be maintained.

There are two stations proposed on this segment of the ATS; the Prairie Avenue/Manchester Boulevard Station and the Prairie Avenue/Hardy Street Station. The Prairie Avenue/Manchester Boulevard Station is proposed on a vacant parcel located on the southwest corner of Prairie Avenue and Manchester Boulevard and the Prairie Avenue/Hardy Street Station is proposed on the northwest corner of Prairie Avenue and Hardy Street on a site currently developed with a retail commercial center. Acquisition of these parcels is proposed as part of the Project.

To accommodate the ATS and to maintain the existing roadway capacity along Prairie Avenue, the ITC Project includes a relocation of an existing traffic lane on the east side of Prairie Avenue. The City will acquire a 30-foot easement along the west edge of the Forum property and the current 30-foot setback area in Hollywood Park Specific Plan area for street purposes. Existing sidewalk widths along Prairie would be maintained, landscaping and signage would be replaced within the existing HPSP setback area, and the intent of the development standards and future development potential would be unchanged by the ITC Project.

The elevated stations and guideway would not obstruct existing traffic flow, would not block access to existing residential, commercial and all other facilities or create a physical division of the existing community, and the Design Guidelines will help minimize visual impacts to the surrounding community.

Additionally, the residential neighborhoods located west of the Prairie Avenue commercial entertainment facilities located east of Prairie Avenue are currently separated by Prairie Avenue. While the ATS guideway and associated support columns would change the physical characteristics of this segment of Prairie Avenue and Prairie Avenue will be shifted to the east as discussed above to maintain the existing roadway capacity, the addition of the ATS system and widening of Prairie Avenue by shifting one travel lane to the east will not result in Prairie Avenue further dividing the community. Access to existing commercial and residential uses on both sides of the guideway would remain due to the elevated nature of the guideway and the implementation of the Design Guidelines. Therefore, the Prairie Avenue Segment of the proposed Project will have a less than significant impact to local access and physical division of the community.

#### **Mitigation Measures**

Impact is less than significant. No mitigation measures required.

#### **Level of Significance after Mitigation**

Impact is less than significant. No mitigation measures required.

**Impact LU-2: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

#### **Impacts**

This analysis addresses both the construction and operation of the proposed Project. The discussion evaluates whether implementation of the proposed Project would conflict with an applicable land use plan, policy, or regulation to such an extent that it would constitute a significant, adverse environmental impact.

The criterion for determining significance with respect to land use plans considers conflicts with plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. This criterion recognizes that an inconsistency with an individual plan, policy, or regulation does not necessarily equate to a significant physical impact on the environment.

**SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy**

The overarching goals of the 2020–2045 SCAG RTP/SCS address four core categories: economy, mobility, environment, and healthy/complete communities. The RTP/SCS includes goals to improve mobility and access for local communities in the region with reliable and safe transportation options. The RTP/SCS also encourages a diverse portfolio of transportation options that would increase people and goods movement within the region using new transportation technologies and data driven solutions that result in more efficient travel. Beyond transportation, the RTP/SCS also seeks to reduce greenhouse gas emissions and improve air quality within the region while supporting more healthy and equitable communities.

The proposed Project would further the objectives of the plan by increasing local and regional transportation options while minimizing greenhouse gas emissions locally and in the region. The proposed Project would be a reliable transportation system that would improve the security and resilience of the regional transportation system by increasing local transportation service capacity and options for transportation in the region. The increase in transportation service capacity would promote regional economic prosperity and competitiveness while serving major regional activity centers including downtown Inglewood, SoFi Stadium, the Forum and the Inglewood Basketball and Entertainment Center (IBEC).

The proposed Project would decrease local VMT and improve local air quality (See **Section 4.2**) in the City of Inglewood. As the proposed Project is located within and adjacent to disadvantaged and underserved communities, the health benefits and reliable, low-cost transit service would create a more equitable community with increased access and reliable transportation options. Lastly, the proposed Project would increase transportation options for diverse housing types in the area, including single and multifamily residential uses in the City of Inglewood.

**Table 4.9-2: SCAG 2020–2045 RTP/SCS Analysis** provides a consistency analysis of the proposed Project as compared to applicable goals and policies contained in various chapters of the SCAG 2020-2045 RTP/SCS. The analysis contained in **Table 4.9-2** demonstrates the proposed Project would generally be consistent with the advisory and voluntary RTP/SCS Goals and Policies. Therefore, implementation of the proposed Project would not result in significant land use impacts due to inconsistency with the RTP/SCS. Accordingly, impacts would be less than significant. For consistency with SCAG growth forecast for population, employment, and housing please refer to **Section 4.11**.

**Table 4.9-2  
SCAG 2020–2045 RTP/SCS Analysis**

2020 RTP/SCS Goals, Policies, and Strategies	Project Consistency
<b>Goal 1:</b> Encourage regional economic prosperity and global competitiveness.	<b>Consistent.</b> Implementation of the proposed Project would have local and regional economic benefits by improving access to the City's major activity centers including downtown Inglewood, SoFi Stadium, Forum and IBEC, increasing regional connectivity, and incentivizing economic activity across the region along the transit route.
<b>Goal 2:</b> Improve mobility, accessibility, reliability, and travel safety for people and goods.	<b>Consistent.</b> The proposed Project would develop a fully elevated guideway connecting the Metro K Line, downtown Inglewood, and the City's major activity centers. The proposed Project would maximize the movement of passengers and travelers on both event and non-event days at SoFi Stadium, Forum and IBEC, by integrating pedestrian, roadway, and transit improvements into an efficient transportation network. Further, the proposed Project would provide convenient, reliable, and time-certain transit service for residents and visitors. As such, the proposed Project would improve mobility, accessibility, reliability, and travel safety for the region.
<b>Goal 3:</b> Enhance the preservation, security, and resilience of the regional transportation system.	<b>Consistent.</b> The proposed Project would develop a fully elevated dual lane guideway with supporting maintenance facilities integrated into the City of Inglewood's transportation system and linking with the regional light rail system. Regular maintenance would be provided to support the continuing operation of the system, enhancing the security and resilience of this new component of the regional transportation system.
<b>Goal 4:</b> Increase person and goods movement and travel choices within the transportation system.	<b>Consistent.</b> The proposed Project would expand the range of travel choices available in the City of Inglewood by adding a transit system that links downtown Inglewood and activity centers in the City with the regional light rail network.
<b>Goal 5:</b> Reduce greenhouse gas emissions and improve air quality.	<b>Consistent.</b> The proposed Project would reduce reliance on automobiles and other light duty vehicles in the City of Inglewood by providing an alternative mode of travel within the City that links to the regional light rail network. The proposed Project also includes streetscape improvements that would facilitate pedestrian and bicycle travel by reducing vehicles and congestion on the existing roadway system and increasing transit, pedestrian, and bicycle use which would reduce greenhouse gas emissions and improve air quality.
<b>Goal 6:</b> Support healthy and equitable communities.	<b>Consistent.</b> The proposed Project would reduce traffic congestion and overall VMT, increasing use of transit, bicycle, and pedestrian travel, which would improve local and regional air quality and public health in the City of Inglewood. The addition of the proposed Project in the City of Inglewood that links to the regional light rail

2020 RTP/SCS Goals, Policies, and Strategies	Project Consistency
	network would provide a reliable, low-cost transportation option to SB 535 disadvantaged communities.
<b>Goal 7:</b> Adapt to a changing climate and support an integrated regional development pattern and transportation network.	<b>Consistent.</b> The proposed Project would include a range of both mandatory and feasible sustainability measures, reduce congestion, and reduce overall vehicle miles traveled (See <b>Section 3.0, Table 3.0-5</b> ). The proposed Project would link downtown Inglewood and activity centers in the City to the Metro K Line light rail line, which would support an integrated development pattern and transportation network.
<b>Goal 8:</b> Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	<b>Consistent.</b> The proposed Project would integrate a new transportation technology into the City's transportation system. By linking downtown Inglewood and activity centers in the City to the regional light rail network, the proposed Project would result in more efficient travel.
<b>Goal 9:</b> Encourage development of diverse housing types in areas that are supported by multiple transportation options	<b>Consistent.</b> Implementation of the proposed Project would expand the range of transportation options available in the City of Inglewood by providing a transit system within the City that links to the regional light rail network, which would facilitate the development of a diverse range of housing in the City.

Source: SCAG. 2020-2045 RTP/SCS ConnectSoCal. September 3, 2020. <https://www.connectsocial.org/Documents/Adopted/ConnectSoCal-Plan.pdf>. Accessed October 6, 2021.

#### Los Angeles County Airport Land Use Commission Airport Land Use Plan

Portions of the guideway, stations, and support facilities, including the MSF, the Prairie Avenue/Manchester Boulevard Station, and the Prairie Avenue/Hardy Street Station, are located within the LAX Planning Boundary/Airport Influence Area. Based on review by the Los Angeles County Airport Land Use Commission staff, review of the proposed Project by the Airport Land Use Commission is not required.

As shown in **Figure 4.9-1**, the proposed Project is also not located within the Runway Protection Zone (RPZ)<sup>28</sup> and is not subject to land use restrictions in the RPZ, including the restrictions on residential and public assembly uses. A portion of the proposed ATS alignment along Manchester Boulevard and Prairie Avenue is located within the 65 dB CNEL noise contour for the airport. As a transit facility, the proposed ATS would be a compatible use in the 65 dB CNEL contour as the ATS is not a noise sensitive use.

28 Los Angeles World Airports. *Los Angeles Plan Amendment Study Report*. March 2012.

#### City of Inglewood General Plan

##### Land Use Element

The General Plan policies focus largely on orderly infill development, promotion of transit oriented development, facilitation of mixed uses, provision of housing for all income level households, improvement of aesthetics, provision of public services, safety from seismic effects, use of alternative energy sources, and prevention of land use consistency conflicts. In order to ensure the proposed Project is consistent with the Land Use Element of the General Plan, the following changes to the Land Use Element are proposed:

- The new text shown as underlined is proposed to be added to the goal below in the "Circulation" subsection of the "Goals and Objectives" section:
  - Promote and support adequate public transportation within the city and the region, including through the development and operation of the Inglewood Transit Connector and its appurtenant infrastructure, stations, maintenance and storage facility, substations, and related improvements.
  - The new text shown as underlined is proposed to be added to the "Downtown Transit Oriented District" subsection of the "Goals and Objectives" section for the following policies and the text shown as strikethrough will be deleted:
    - Policy 2.3: *Preservation of Historic Fabric*. Require the preservation of buildings that have been designated as historic and encourage the reuse of other historic buildings. Maintain the sense of place in areas with historic fabric and/or meaning such as Market Street between Regent Street and Hillcrest Avenue and the Hillcrest neighborhood east of Locust Street, while also accommodating for the development of the Inglewood Transit Connector along Market Street between Regent Street and Manchester Boulevard.
    - Policy 3.5: *Local Transit Connections to Metro Rail*. Provide quality local transit connections from major destinations such as the NFL Stadium and Forum to downtown and the Downtown Inglewood Metro station through development and operation of the Inglewood Transit Connector using existing or emerging technologies.
    - Policy 3.6: *Parking District*. Establish a parking district with shared parking consolidated in garages or surface lots and manage pricing.
- The new text shown as underlined is proposed to be added and the text shown as strikethrough would be deleted under the "Passenger Train Service" subsection in the "Development Factors – Transportation Network" section:
  - Passenger Train Service

Inglewood is currently connected to the Los Angeles Metro Rail system by Crenshaw Station on the Metro C Line. This station is located in the 105 freeway at Crenshaw Boulevard.

The Metro K Line, scheduled to open in 2021~~19~~, will add three new stations to the City of Inglewood: Fairview Heights (Florence/West), Downtown Inglewood (Florence/La Brea), and Westchester/Veterans (Florence/Hindry).

The Inglewood Transit Connector, anticipated to open in 2027, would further enhance connectivity by adding an extension from the Metro K Line that would connect the transit line's

Market Street Station (located at Florence/Market) to the entertainment, housing, and employment centers located at or near The Forum, the NFL Stadium, Hollywood Park and the future Inglewood Basketball and Entertainment Center.

2. The new text shown as underlined is proposed to be added and the text shown as strikethrough would be deleted in the “Downtown Transit Oriented District” subsection in “Future Land Uses”:

G. Downtown Transit Oriented District [*Intervening text intentionally omitted*]

The Downtown Transit Oriented District consists principally of the half-mile radius around the Downtown Inglewood Metro Station located near Florence Avenue and Market Street but also can incorporate the areas adjacent to the Inglewood Transit Connector. The Transit Oriented District should contain a variety of mutually complementary uses, including residential, office, retail, government and light industrial/creative office, all in a pedestrian-friendly environment that facilitates transit usage. Concept plans, zoning and design guidelines for this District are given by the TOD Plan for the area or, with respect to those areas containing the Inglewood Transit Connector, the zoning provisions and design guidelines of the Transportation Corridor Overlay Zone. It is divided into seven sub-districts: Historic Downtown, Civic Center, TechTown, Beach Avenue, Fairview West, Hillcrest and Queen Street.

The proposed amendments are consistent with the intent of these existing goals and policies for the Downtown Transit Oriented District and the City’s circulation system. Specifically, the proposed Project would implement Policy 3.5 by providing a local connection to the Metro Rail system from Downtown Inglewood and activity centers in the City including SoFi Stadium, Forum, and IBEC. The additional surface parking lots providing public parking included as components of the proposed Project are consistent with the intent of Policy 3.6 for parking in the Downtown Transit Oriented District.

The proposed changes are consistent with the Land Use Element goals for promoting and providing adequate public transit to the local community. The proposed Project would add reliable public transit to Inglewood communities that do not have access to existing transit services. The Design Guidelines would ensure the proposed Project is integrated into the historic fabric for the segment of the guideway that would travel through the City’s historic core along Market Street.

The proposed TOC Overlay Zone and Design Guidelines are complementary to, and consistent with the existing policies for the Downtown Transit Oriented District to create a pedestrian-friendly environment that facilitates transit usage.

Overall, the proposed Project furthers the goals of the Land Use Element by providing additional transit options and facilitating transit-oriented development within the City of Inglewood. As the proposed Project would connect passengers between downtown Inglewood and the City’s activity centers, it would result in additional transit options for both residents and visitors and create transit-oriented development areas near the transit line.

The proposed Project also supports other General Plan policies as well which are not directly related to transit. The proposed Project would support infill development and increase the use of alternative methods of circulation centered around the Metro system, pedestrian network, and bicycle facilities. The increase in visitors and pedestrian activity that would be associated with the proposed Project in downtown and around the other stations, coupled with proposed streetscape improvements, would advance economic development through increased patronage at local businesses and help encourage mixed-use land development patterns conducive to pedestrian activity.

As shown in **Table 4.9-3: Project Consistency with General Plan Land Use Element**, the proposed Project would support and would be generally consistent with the Land Use Element. Operation of the proposed Project would not conflict with any of the applicable goals, objectives, and policies included in the City’s General Plan Land Use Element and, thus, would not result in a significant impact.

**Table 4.9-3  
Project Consistency with General Plan Land Use Element**

Goals and Policies	Project Consistency
<b>Goals and Policies added with 2016 Amendment</b>	
<b>Goal 1:</b> Downtown is a place to live, work, shop, recreate, and be entertained.	<b>Consistent.</b> The proposed Project would strengthen Downtown Inglewood for commercial and residential uses by increasing accessibility to the downtown area from local activity centers and the regional light rail network. This increased transit accessibility would promote local economic development opportunities, and enhance downtown’s retail, recreation, and entertainment offerings and range of housing and employment options. Implementation of the proposed Project would activate and complement development in the City, and enhance social cohesion, equity, and community resilience.
<b>Policy 1.1:</b> Mixed Use Development. Encourage a range of residential, retail, office, recreational, and institutional uses in the Historic Downtown to create a vibrant urban district and support local business.	<b>Consistent.</b> The proposed Project would increase transit accessibility in the City’s Historic Downtown, which would support and encourage the development of a range of residential, retail, office, recreational, and institutional uses. By connecting downtown with local activity centers and the regional light rail network, the proposed Project would result in an increase in visitors and pedestrian activity in the downtown neighborhood that would support the development of a vibrant urban district and support local businesses.
<b>Goal 2:</b> Downtown is a revitalized yet forward-looking gathering place for the community.	<b>Consistent.</b> The proposed Project would promote economic development opportunities in downtown Inglewood and support the development of a revitalized downtown that serves as a gathering place for residents and visitors by increasing transit accessibility.
<b>Policy 2.2:</b> Pedestrian Network. Enhance sidewalks, repurpose alleys and create mid-block passthroughs and	<b>Consistent.</b> The proposed Project would maintain and enhance sidewalks around the stations and guideway which would enhance the pedestrian environment.

4.9 Land Use and Planning

Goals and Policies	Project Consistency
internal courtyards to serve as pedestrian passageways and enjoyable public spaces.	Sidewalks would be enhanced and widened at necessary points adjacent to the support columns to meet Americans with Disabilities Act (ADA) pedestrian circulation requirements, including along Market Street. New enjoyable public spaces would be created at each of the proposed stations that would be designed in accordance with the Design Guidelines.
<b>Policy 2.3:</b> Preservation of Historic Fabric. Require the preservation of buildings that have been designated as historic and encourage the reuse of other historic buildings. Maintain the sense of place in areas with historic fabric and/or meaning such as Market Street between Regent Street and Hillcrest Avenue and the Hillcrest neighborhood east of Locust Street.	<b>Consistent.</b> The proposed Project would not result in significant impacts to historic buildings. For detailed analysis, please refer to <b>Section 4.4 Cultural Resources</b> . To properly incorporate the proposed Project into the existing historic fabric of downtown Inglewood, the amendment to Policy 2.3 has been proposed to include the ATS system. With the incorporation of the GP amendment the proposed Project would be consistent with the GP Land Use Element.  The guideway would have an integrated, clean design, with round columns spaced as far apart as feasible. The underside of the guideway would be smooth, and color of the concrete would be neutral with accents achieved through lighting with tapered edges to reduce visual massing. Street trees and new landscaping would be planted within the median below Market Street. Improved landscaping and widened sidewalks would enhance the public realm for pedestrians to gather and circulate along Market Street.
<b>Goal 3:</b> Downtown provides a unique mix of accessibility options including light rail, pedestrians, bicycles, autos, buses, and advanced technology local transit.	<b>Consistent.</b> The proposed Project would expand the range of accessibility options in downtown consistent with this goal by connecting downtown to the regional light rail network and enhance pedestrian and bicycle transit through streetscape improvements.
<b>Policy 3.1:</b> Complete Streets. Accommodate all modes of transportation on streets, with particular attention to transit vehicles and pedestrians, but also design streets to serve as open spaces in the urban environment, places where people gather, communicators of the locality's culture, vision and values, and generators of development on adjacent parcels.	<b>Consistent.</b> The guideway would be fully elevated above the existing street network, adding an additional mode of transportation without affecting the existing street network. Streetscape improvements would maintain and improve pedestrian access around the stations. The Design Guidelines address the design character of the stations and the integration of the stations with the pedestrian, bicycle, and vehicular character of the street network.
<b>Policy 3.4:</b> Pedestrian Connections to Metro Rail. Establish high-quality at-grade and/or bridge connections from the Downtown Inglewood Metro station across Florence Avenue to the south. Make every effort to facilitate a direct pedestrian connection from the station to Beach Avenue to the north.	<b>Consistent.</b> The proposed Project would provide a pedestrian connection from the Market Street/Florence Avenue Station to the Metro K Line by means of an elevated passenger walkway spanning Florence Avenue. The elevated passenger walkway would extend north from the mezzanine level of the Market Street/Florence Avenue Station, cross Florence Avenue, and land on the pedestrian sidewalk on the north side of Florence Avenue. Additionally, the Market Street/Florence Avenue Station would include ground level pedestrian connections to encourage pedestrian circulation in the vicinity of the proposed Project.
<b>Policy 3.5:</b> Local Transit Connections to Metro Rail. Provide quality local transit connections from major	<b>Consistent.</b> The primary intent of the proposed Project is to provide a public transportation connection between

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Goals and Policies	Project Consistency
destinations such as the NFL Stadium and Forum to Downtown and the Downtown Inglewood Metro station using existing or emerging technologies.	the Metro K line and major activity centers in the City, including the Forum, Los Angeles Sports and Entertainment District, and future Inglewood Basketball and Entertainment Center. The ATS trains would be a driverless, self-propelled electric train using existing technologies to make the transit connection.
<b>Policy 3.6:</b> Parking District. Establish a parking district with shared parking consolidated in garages and manage pricing.	<b>Consistent.</b> Parking facilities would be provided as part of the proposed Project to supplement existing parking in downtown and offset any existing street-side parking that may be impacted by the implementation of the proposed Project.
<b>Goal 4:</b> Downtown is a major economic engine providing jobs, sales tax, and other revenues.	<b>Consistent.</b> The proposed Project would increase the number of visitors to downtown Inglewood. This increase would generate additional business patronage and economic growth in downtown, contributing to more jobs, sales tax revenue, and other revenues in the City.
<b>Policy 4.1:</b> Major Sites Development. Develop major sites and create new destinations at the north and south ends of Market Street, immediately north of the Metro station, and on and around the City Yard that create jobs, generate revenues for the city through sales and bed tax and provide new opportunities for residents.	<b>Consistent.</b> The guideway would begin at the Market Street/Florence Avenue Station, located near the Market Street/Florence Avenue intersection. The placement of a station in this vicinity would serve to create a public transportation destination for visitors or residents traveling to one of the City's activity centers or to downtown. This increase in transit accessibility and activity in downtown would support the development of major site at the north and south ends of Market Street.
<b>Goals and Policies (as adopted January 1980)</b>	
<b>General</b>	
Provide for the orderly development and redevelopment of the City while preserving a measure of diversity among its parts. Allocate land in the City to satisfy the multiple needs of residents but recognize that land is a scarce resource to be conserved rather than wasted.	<b>Consistent.</b> The proposed Project involves the development of an elevated guideway built entirely above grade and largely within the public rights-of-way, with support constructed on appropriate sites adjacent to the guideway. The MSF would consist of an elevated building on an approximately 4- to 6-acre site with sufficient space for maintenance facilities, administration facilities, storage, shipping/receiving areas, and staff parking. The guideway, stations, and support facilities are intended to meet the transportation needs of the City while ensuring that the development of new, major activity centers can be accommodated by the local and regional transportation network in an orderly fashion. Additionally, the proposed Project would encourage complementary transit-oriented, mixed-use development near stations conducive to the anticipated increase in pedestrian activity, including within the Downtown TOD Plan area.
Help promote sound economic development and increase employment opportunities for the City's residents by responding to changing economic conditions.	<b>Consistent.</b> The proposed Project would support economic activity in downtown Inglewood by improving connectivity to activity centers in the region and locally, thereby increasing employment opportunities for the City's residents. Additionally, the proposed Project would create jobs in the maintenance and operation of the ATS trains at the MSF.

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Goals and Policies	Project Consistency
Maximize the use and conservation of existing housing stock and neighborhoods and also facilitate development of new housing to meet community needs.	<b>Consistent.</b> The proposed Project would provide an additional transportation option between downtown Inglewood and the City's activity centers for visitors and residents. The proposed Project would enhance the use and viability of existing housing as well as encourage new mixed-use, transit-oriented development, including residential uses.
Promote Inglewood's image and identity as an independent community within the Los Angeles metropolitan area.	<b>Consistent.</b> The proposed Project would encourage and facilitate greater access to the City's activity centers, including SoFi Stadium, Forum, IBEC and downtown Inglewood. These activity centers contribute to the City's status and identity as an entertainment destination within the Los Angeles metropolitan area.
<b>Commercial</b>	
Create and maintain a healthy economic condition with the present business community and assist new business to locate within the City.	<b>Consistent.</b> The proposed Project's introduction of increased visitors through increased connectivity to the region would likely have the effect of encouraging business patronage, employment, and economic growth in the City.
Protect local businessmen and encourage the importance of maintaining a strong commercial district in the downtown.	<b>Consistent.</b> As mentioned previously, the proposed Project's introduction of increased visitors and pedestrian traffic in the downtown neighborhood would likely have the effect of encouraging business patronage, employment, and economic growth in the area.
Improve the visual appearance and economic condition of the existing arterial commercial development along Inglewood's major streets.	<b>Consistent.</b> The proposed Project would enhance the appearance of major streets adjacent to the ATS system facilities including sidewalks and roadway medians. The appearance of the ATS structure would be modern with transparent and neutral toned color scheme to create an appealing appearance. The color scheme is also chosen to help better integrate the ATS structure with the adjacent environment. The ATS system would facilitate movement of greater numbers of residents and visitors along major streets in the City, thereby having the potential to activate existing commercial corridors, particularly along Market Street.
Promote the development of commercial/recreational uses which would complement those which are already located in Inglewood.	<b>Consistent.</b> As mentioned previously, the proposed Project's introduction of increased visitors and pedestrian traffic in the downtown neighborhood would likely have the effect of encouraging business patronage, employment, and recreational development in the area. Connectivity to existing recreational uses such as the Forum and SoFi stadium would complement commercial recreational uses already located in Inglewood.
<b>Industrial</b>	
Increase the industrial employment opportunities for the City's residents.	<b>Consistent.</b> The proposed Project would include an MSF which would provide for regular and preventive maintenance of the ATS train rolling stock and operating equipment, as well as space for storage of the vehicle fleet. Additionally, the MSF would house the operations control center where automated train operations would be monitored and controlled. The proposed Project is

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Goals and Policies	Project Consistency
	anticipated to generate approximately 150 full time employment opportunities in the light industrial sector.
<b>Circulation</b>	
Ensure that proposed new uses can be accommodated by adequate and safe streets.	<b>Consistent.</b> During construction of the proposed Project, right-of-way closures or diversions may occur along the length of the guideway and near the MSF and City's ITF sites. However, such closures would be temporary and would adhere to a traffic construction management plan as approved by the City of Inglewood Transportation Division. Upon implementation of the proposed Project, the existing number of travel lanes in the area would be maintained and area roadways would continue to accommodate a range of transportation options.
Promote and support adequate public transportation within the City and the region.	<b>Consistent.</b> The proposed Project would increase existing capacity and provide additional access to public transportation within the City and the region by adding a transit system to connect visitors and residents with downtown Inglewood and activity centers in the City and to regional light rail system.
Develop modified traffic systems that would discourage through traffic from utilizing neighborhood streets.	<b>Consistent.</b> Implementation of the proposed Project would increase transit choices and reduce vehicle trips in the City.
Develop a safe and adequate pedestrian circulation system which is barrier-free for the handicapped.	<b>Consistent.</b> The proposed Project would include pedestrian access at the ground level surrounding the stations along the proposed Project. Access to the stations would be accomplished through ADA-compliant pedestrian amenities such as escalators, elevators, stairs, signage, walkways, and mezzanine areas. Streetscape improvements along the guideway would ensure that sidewalks/walkways would be ADA-compliant surrounding stations, support columns, and other facilities.
<b>Community Facilities</b>	
Maintain the present high level of police and fire services to the extent it is fiscally prudent.	<b>Consistent.</b> The proposed Project would divert some attendees of the City's activity centers who would otherwise travel by private vehicle, resulting in reduced traffic and congestion. The reduction in surface vehicle traffic could potentially reduce the amount of police and fire services required in the area. However, passengers of the ATS system would require additional police and fire services. The City would work with the local police and fire services to ensure that a high quality of existing police and fire services would be maintained.
Expand opportunities for cultural and social growth for the City's residents.	<b>Consistent.</b> The proposed Project would encourage economic development in downtown Inglewood and transit-oriented development in the vicinity of the proposed Project while connecting neighborhoods with the City's activity centers. These efforts would serve to expand opportunities for cultural and social growth amongst the City's residents.
Source: City of Inglewood General Plan, "Land Use Element" (2016). *Proposed GP Amendment	

**Environmental Justice Element**

The Environmental Justice Element focuses on issues of equity when planning for future growth and development in the City, highlighting two environmental justice factors- pollution burden and population characteristics. Environmental Justice is a prominent issue in the City as residents in the City primarily reside in SB 535 disadvantaged communities and the City of Inglewood consistently ranks among the top 25 percent in California with the highest pollution burden and socioeconomic vulnerabilities.<sup>29</sup>

The proposed Project would further the goals and objectives stated within the Element by providing reliable transit service and improving mobility of the local City residents while reducing the number of vehicles on the existing roadway. These reductions in vehicle miles traveled would contribute to a reduction in air quality impacts in the local neighborhoods and the region, providing an improvement to local air quality and public health (see **Section 4.2**). Noise impacts on the roadways would not increase during the operation of the proposed Project and the overall noise impact would be less than significant during operation which would ensure the quality of life of the nearby communities (see **Section 4.10**). The City has involved and would continue to involve the community during the proposed Project’s planning and environmental review process and has provided and would continue to provide information to the public through public outreach efforts, notifications online and publications in newspapers and mailing notices. For outreach effort information conducted during the planning period by the proposed Project, please refer to **Section 2.0: Introduction** and associated appendices (**Appendix A: Revised NOP and IS** and **Appendix B: Summary of Comments on Revised NOP**). Furthermore, over 100 public meetings have been held with community members including local businesses and property owners. The City would continue outreach efforts during the construction period to inform communities and businesses of the latest project construction updates, to coordinate mitigation measures to local businesses for parking and access, and to provide additional signage, advertisements, and support throughout the construction duration.<sup>30</sup> These outreach efforts increase the participation of nearby disadvantaged neighborhoods and makes project information available to the public.

In addition, the proposed MSF has been sited and designed to maintain the existing Vons Store on Manchester Boulevard, consistent with the goals and policies in the Element to provide access to affordable and nutritious food.

As shown in **Table 4.9-4: Project Consistency with Environmental Justice Element**, the proposed Project would support and be consistent with the Environmental Justice Element.

<sup>29</sup> City of Inglewood. *Environmental Justice Element*. April 2020. <https://www.cityofinglewood.org/DocumentCenter/View/14211/Environmental-Justice-Element>.  
<sup>30</sup> ITC Construction Commitment Program.

**Table 4.9-4  
Project Consistency with Environmental Justice Element**

**Goals and Policies**  
**Participation and Collaboration**

**Goal 1:** Residents and stakeholders who are aware of, and effectively participate in, decisions that affect their environment and quality of life. **Consistent.** The City circulated the Initial Study (Original IS) and issued a Notice of Preparation (Original NOP) on July 16, 2018. Publication of project notices were also published in Los Angeles Times (July 18, 2018), La Opinion (July 18, 2018), and Inglewood News (July 19, 2018) newspaper circulations. A public scoping meeting for the proposed Project was held on July 26, 2018. Notification of revised project scope were circulated via a Revised NOP and Revised IS on September 10, 2020. Notice was provided by publication in newspaper circulations for the Revised NOP including Los Angeles Times on September 16, 2020, Inglewood Today on September 24, 2020, and the Spanish- language newspaper La Opinion on September 15, 2020, as well. Comments were collected from both rounds of NOP/IS publications and the scoping meeting and considered in the formulation and assessment for the proposed Project. The City provided notice of the availability (NOA) of the Draft Environmental Impact Report on December 23, 2020. This notice stated that comments would be accepted on the DEIR through February 8, 2021. The NOA was published in the Los Angeles Times on December 23, 2020, and was also published in the Spanish- language newspaper La Opinion on December 17, 2020. The City would continue to ensure residents and stakeholders are aware of, and can effectively participate in, decisions concerning the proposed Project and its environmental effects.

**Policy EJ-1.11:** Conduct broad outreach on public hearings that affect the environment in languages used by the community. **Consistent.** The City hosted an open house style public scoping meeting for the proposed Project on July 26, 2018. Both Spanish translators and sign language interpreters were present to assist with interpretation. The Original IS and Original NOP were circulated on July 16, 2018, and three newspaper publications were published on July 18/19, 2018. Additionally, a Revised NOP and IS with updated project information were published on September 10, 2020. Publications notices were published in the newspaper circulations for the Revised NOP including Los Angeles Times on September 16, 2020, Inglewood Today on September 24, 2020, and the Spanish- language newspaper La Opinion on September 15, 2020, as well. Comments from the public, organizations, and agencies were collected and considered for Project analysis. The City provided notice of the availability (NOA) of the Draft Environmental Impact Report on December 23, 2020. This notice stated that comments would be accepted on the DEIR through February 8, 2021. The NOA was published in the Los Angeles Times on December 23, 2020, and was also

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published in the Spanish- language newspaper La Opinion on December 17, 2020. The City also held a virtual public meeting on January 13, 2021, to provide information on the project and allow for public comments on the Draft EIR. Outreach efforts continued after and in between the scoping periods and reaching over 100 community and stakeholder outreach meetings prior to the publication of this DEIR. Outreach efforts will continue to be held after the publication of the Recirculated DEIR with additional newspaper publications and public hearings being held.

**Policy EJ-1.12:** Inform the public on decisions that affect their environment using multiple communication methods, including traditional and online forms of communication.

**Consistent.** Three newspaper notices publications were published on July 18/19, 2018. Circulation of Original NOP by mail was distributed on July 16, 2018. The Original IS and Original NOP were also posted on City of Inglewood’s Envisioning Inglewood website and CEQAnet. Additionally, a Revised NOP and IS with updated project information were published on September 10, 2020. Publications notices were published in the newspaper circulations for the Revised NOP including Los Angeles Times on September 16, 2020, Inglewood Today on September 24, 2020, and the Spanish- language newspaper La Opinion on September 15, 2020, as well. The City provided notice of the availability (NOA) of the Draft Environmental Impact Report on December 23, 2020. This notice stated that comments would be accepted on the DEIR through February 8, 2021. The NOA was published in the Los Angeles Times on December 23, 2020, and was also published in the Spanish- language newspaper La Opinion on December 17, 2020. The City would continue to use multiple communication methods, including traditional and online forms of communications, for the proposed Project during the Project review, the approval process, and during the construction duration.

**Policy EJ-1.13:** Provide written notices and other announcements regarding key land use and development issues in English and Spanish where feasible. For all other materials, note that verbal translation assistance is available.

**Consistent.** Newspaper notices were published in both Spanish and English in three newspapers—Los Angeles Times, La Opinion, and Inglewood Times. The City would continue to follow these notice procedures for the proposed Project.

**Policy EJ-1.14:** Offer interpretation services at key meetings and workshops on issues affecting the environment.

**Consistent.** Project public scoping meeting hosted on July 26, 2018, included Spanish translators and sign language interpreters for the meeting. Spanish translators and sign language interpreters will also be present at future meetings hosted for the Project.

**Policy EJ-1.15:** Consider offering childcare at key meetings and workshops on environmental issues affecting entire neighborhoods and the City as a whole.

**Consistent.** The scoping meeting was a focused technical meeting; childcare was considered for this meeting but determined not to be warranted. Childcare would be considered for future general meetings on the Project.

**Policy EJ-1.16:** Consider varying the time and date of key meetings and workshops, or holding multiple meetings and workshops, in order to ensure broad participation.

**Consistent.** Over 100 meetings with community stakeholders, including business owners and property owners, and agencies has been conducted over the span of over two years. The number of meetings and varying

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time, date, and places ensured broad participation by the public. The City would continue to consider varying times, dates, and places for Project meetings and workshops for all future meetings.

**Policy EJ-1.17:** Seek feedback on public decisions through traditional and online forms of communication, such as website, email, mobile phone apps, online forums, and podcasts.

**Consistent.** Public comment periods were held from July 16, 2018, to August 15, 2018, and from September 10, 2020, to October 12, 2020, for the Original and Revised NOPs. Public comments were accepted on the Draft EIR from December 23, 2020, to February 8, 2021. Comments and feedback on the proposed Project were accepted both through an online form and mail. Both the Original NOP and the Revised NOP for the proposed Project was published through the Envision Inglewood website and distributed through emails and on the ground mailing. The City would continue to seek feedback on the proposed Project through traditional and online forms of communication.

**Policy EJ-1.18:** Partner with community-based organizations that have relationships, trust, and cultural competency with target communities to outreach on local initiatives and issues.

**Consistent.** The City has and would continue to coordinate with community-based organizations to conduct outreach on the proposed Project (See Section 2.0).

General Environmental Health

**Goal 2:** The community’s exposure to pollution in the environment is minimized through sound planning and public decision making.

**Consistent.** The proposed Project would reduce overall vehicle miles traveled, reduce congestion, and improve local air quality.

**Policy EJ-2.1:** Incorporate compliance with State and federal environmental regulations in project approvals.

**Consistent.** The proposed Project would comply with all State and federal environmental regulations for project approval.

**Policy EJ-2.2:** Work with other agencies to minimize exposure to air pollution and other hazards in the environment.

**Consistent.** The proposed Project would reduce overall vehicle miles traveled, reduce congestion, and improve air quality in the local community. The City has planned the proposed Project in cooperation with local and regional agencies.

**Policy EJ-2.3:** Ensure compliance with rules regarding remediation of contaminated sites prior to occupancy of new development.

**Consistent.** The proposed Project would provide remediation to sites with contamination prior to construction of the proposed Project’s components. This includes the removal of existing UST at the MSF site and potentially contaminated soil due to prior use. Refer to Section 4.8: Hazards for more information.

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

**Consistent.** The proposed Project would add to local transportation options and promote land use patterns that encourage people to walk, bicycle, and use public transit. Pedestrian facilities near stations and along the guideway would be widened and improved to incorporate ADA components and bicycle parking would be provided at transit stations.

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

**Consistent.** The proposed Project would provide an additional public transit option to the local area and reduce overall vehicle miles traveled, reduce congestion, and improve local air quality.

4.9 Land Use and Planning

**Goals and Policies**

**Policy EJ-2.12:** Place adequate conditions on large construction projects to ensure they do not create noise, dust, or other impacts on the community to the extent feasible.

**Consistent.** The proposed Project would include a Construction Commitment Program and implement mitigation measures to minimize the impacts of construction on the community to the extent feasible. Refer to **Sections 4.2** and **4.10** for more information.

**Access and Connectivity**

**Goal 3:** A community that promotes physical activity and opportunities for active living.

**Consistent.** The proposed Project would promote active living by reducing vehicle volumes and congestion on the City's street system and enhancing the pedestrian and bicycle infrastructure in the City.

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

**Consistent.** The proposed Project would construct on-site bicycle facilities at stations to facilitate an active lifestyle around the City.

**Policy EJ-3.5:** Partner with transit agencies to ensure that parks and recreational facilities are accessible to low-income and minority populations.

**Consistent.** The proposed Project would provide an additional transit option for residents to access park and recreation facilities in the City.

**Policy EJ-3.7:** Encourage new specific plans and development projects be designed to promote pedestrian movement through direct, safe, and pleasant routes that connect destinations inside and outside the plan or project area.

**Consistent.** Pedestrian facilities including sidewalks, elevated passenger walkways, and access around stations would be improved to accommodate for ADA requirements and widened to accommodate for support column widths. A elevated passenger walkway would connect the Market Street/Florence Avenue Station with the Metro K Line downtown Inglewood station to facilitate direct and safe pedestrian travel.

**Affordable and Nutritious Food**

**Goal 4:** Healthy, affordable, and culturally appropriate food is readily available to all members of the community.

**Consistent.** Currently all Inglewood residents are within 1-mile of a grocery store, and approximately ninety-two percent (92.1%) of all residents are within 1/8-mile of a grocery store. The proposed MSF has been sited and designed to allow a new replacement Vons store to be developed on the site of the existing Vons store and co-located with the MSF. All Inglewood residents will remain within 1-mile of a grocery store.

**Policy EJ-4.4:** Maximize multimodal access to fresh food by encouraging grocery stores, healthy corner stores, and outdoor markets at key transit nodes and within new transit-oriented development projects.

**Consistent.** The proposed Project would provide additional mode of transportation providing local access to grocery stores and fresh food through the ATS system. Roadway adjacent facilities such as passenger walkways would also be improved to encourage local multimodal access. The proposed Project would facilitate the development of a new Vons replacement store on the MSF Site to replace the existing store to maintain access for the community to a grocery store at this location.

**Public Facilities**

**Goal 6:** Adequate and equitably distributed public facilities are available in the community.

**Consistent.** The proposed Project would provide transit service linking the southern area of the City with downtown and the regional light rail network. The proposed Project would increase local transit options, providing additional reliable and low-cost transportation facilities connecting communities across the City and to regional activity centers on the Metro K line.

4.9 Land Use and Planning

**Goals and Policies**

**Policy EJ-6.1:** Ensure the City provides equitable public improvements and community amenities to all areas of the City.

**Consistent.** The proposed Project would provide a reliable and low-cost transit option for the southern area of the City from the Metro K line, thereby increasing local transit options. Pedestrian facilities along the guideway and stations would be widened and improved to accommodate for ADA compliance and column widths. In addition, bike racks would be provided for community use and promote active transportation.

**Policy EJ-6.2:** Prioritize the City's capital improvement program to address the needs of disadvantaged communities.

**Consistent.** The proposed Project is entirely within or adjacent to SB 535 disadvantaged communities, located in the center of downtown Inglewood and provides transit service to the southern area of the City. The proposed Project would increase local transit options, providing an additional reliable and low-cost transportation facility connecting underserved communities across the City and to regional activity centers on the Metro K line.

**Policy EJ-6.3:** Plan for the future public improvement and service needs of underserved communities.

**Consistent.** As discussed in **Section 4.11**, both employment and population in Inglewood are anticipated to increase overtime. In addition, over 90 percent of the City's residents work outside of the City in the greater Los Angeles region. The proposed Project would reduce congestion and increase transportation capacity, while providing a reliable and low-cost transportation option to disadvantaged communities. As previously discussed, the proposed Project would be located entirely within an SB 535 disadvantaged community.

**Policy EJ-6.6:** Provide ongoing infrastructure maintenance in existing residential neighborhoods through the capital improvement program.

**Consistent.** The proposed Project would construct the MSF to allow for the continued maintenance of the ATS trains. Long term maintenance and operation of the system is anticipated for the proposed Project.

**Policy EJ-6.8:** Ensure that new public facilities are well designed, energy efficient and compatible with adjacent land uses.

**Consistent.** The proposed Project includes a range of both mandatory and additional feasible sustainability measures including energy efficiency measures, and measures to reduce congestion and overall vehicle miles traveled (See **Section 3.0, Table 3.0-5**). As discussed in **Section 4.1**, the proposed Project would include designs that would complement adjacent land uses and fit into the larger fabric of the community.

**Policy EJ-6.10:** Coordinate with the Inglewood Unified School District, transit agencies and other public agencies to provide adequate public facilities, improvements, and programs to the City of Inglewood.

**Consistent.** The NOP and Revised NOP were distributed to the Inglewood Unified School District and various public agencies including Metro and Caltrans. The proposed Project has taken the School District's concerns into account regarding Kelso Elementary School and would continue to work with the School District to minimize any potential project impacts to the school.

Source: City of Inglewood General Plan, "Environmental Justice Element" (2020).

**City of Inglewood Planning and Zoning Code**

The City of Inglewood Planning and Zoning Code implements the goals and policies of the comprehensive General Plan. To be consistent with the established zoning code, a proposed Project needs to be consistent with applicable standards.

The proposed Project includes the proposed adoption of a TC Overlay Zone to define appropriate standards for the development and operation of the proposed Project. A description of the TC Overlay Zone is analyzed below for its consistency to the General Plan and its effect on the proposed Project.

**New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines**

The New Downtown and Fairview Heights TOD Plan and Design Guidelines apply to new construction or rehabilitation within the areas of Fairview Heights and Downtown Inglewood. The New Downtown and Fairview Heights TOD Plan and Design Guidelines address the Downtown TOD area and Fairview Heights TOD areas separately. The Downtown TOD area consists of approximately 585 acres located in the center of Inglewood along the new Metro K line just east of the Florence Avenue/La Brea Avenue intersection. This planning and zoning area extends approximately ½ mile in all directions from the Metro K Line Downtown Inglewood Station.

The New Downtown and Fairview Heights TOD Plan details the vision for the downtown area of the City as a place to live, work, shop and be entertained with a unique mix of accessibility options. The Plan also promotes sustainable development. The proposed Project supports this vision through the implementation of the transit system and the upgrading of pedestrian facilities, while connecting downtown to major commercial entertainment centers including the Forum and HPSP. The TC Overlay Zone, which is designed to implement the proposed Project, would also complement anticipated mixed-use development adjacent to the proposed Project to help revitalize downtown Inglewood. Transit development is considered a sustainable development through its reduction in VMT and air pollutants while offering reliable transit service to the public. In general, the proposed Project supports the visions of the New Downtown and Fairview Heights TOD Plan.

An analysis of the New Downtown and Fairview Heights TOD Plan vision and design concept elements is provided in **Table 4.9-5: Project Consistency with New Downtown and Fairview Heights TOD Plan and Design Guidelines**. The analysis within this section and the table shows that the proposed Project would support and be generally consistent with the New Downtown and Fairview Heights TOD Plan and Design Guidelines. Thus, the proposed Project would result in a less than significant impact related to potential conflicts with the New Downtown and Fairview Heights TOD Plan and Design Guidelines.

**Table 4.9-5  
Project Consistency with New Downtown and Fairview Heights TOD Plan and Design Guidelines**

Vision and Design Concept Elements	
Vision	
Downtown is a place to live, work, shop and be entertained.	<b>Consistent.</b> The proposed Project would strengthen downtown Inglewood neighborhoods by providing a direct connection between downtown Inglewood and major activity centers, promoting local economic development opportunities, and enhancing future transit-oriented development opportunities. These efforts would have the effect of enhancing downtown's retail, recreation, and entertainment offerings and range of housing and employment options. Implementation of the proposed Project would activate and complement development in the City, and enhance social cohesion, equity, and community resilience.
Downtown is a revitalized yet forward-looking gathering place for the community.	<b>Consistent.</b> The proposed Project would help promote economic development in downtown Inglewood and enhance future transit-oriented land use patterns. These opportunities would be a culmination of local planning efforts to achieve a denser built environment connected by modern modes of public transportation. Connections to downtown from regional activity centers would encourage visitors and residents to gather in Downtown gathering spaces. Combined, these efforts would serve to promote downtown Inglewood as a destination location within the neighborhood and broader community.
Downtown provides a unique mix of accessibility options including light rail, pedestrians, bicycles, autos, buses, and advanced technology local transit.	<b>Consistent.</b> Implementation of the proposed Project would provide a convenient, reliable, and efficient public transportation option and help diversify the transit options in the downtown Inglewood neighborhood. The proposed Project would serve to increase accessibility to and through the area and help to complete the first/last mile connection from the regional Metro rail system to the City's major activity centers. Pedestrian access and sidewalks in and around the guideway would be enhanced and widened to support columns and meet ADA pedestrian circulation requirements. The updated pedestrian sidewalks would increase accessibility options around downtown.
Downtown is a major economic engine providing jobs, sales tax, and other revenues.	<b>Consistent.</b> As discussed previously, the proposed Project would increase the number of visitors to and through downtown Inglewood. This increase in activity would generate additional business patronage and economic growth in the downtown neighborhood, contributing to more jobs, sales tax revenue, and other revenues in the City.
Downtown is a model for sustainable development.	<b>Consistent.</b> The proposed Project would reduce roadway congestion. The proposed Project's associated streetscape improvements would improve pedestrian access in the proposed Project. The removal of vehicles and congestion on the existing roadway and the increase of transit and pedestrian roadway use would improve air

**Vision and Design Concept Elements**

	quality in the region and reduce greenhouse gas emissions
Downtown expresses the unique culture of Inglewood.	<b>Consistent.</b> The proposed Project design would reflect the unique character of downtown Inglewood through holistic and integrated design components that integrates the stations within the local setting. For more information, please refer to <b>Section 4.1</b> .

**Design Concept Elements**

<b>Area 1:</b> Creation of a new North Market Place destination which includes Inglewood Plaza- the City's new gathering place, closure of Market Street north of Regent Street as part of the Plaza, provision of pedestrian oriented retail around the plaza, new residential developments, several public parking structures, and a bridge/escalator connection across Florence Boulevard.	<b>Consistent.</b> Pedestrian facilities along the guideway and surrounding stations would be improved to incorporate ADA components and widened to accommodate for support columns. In addition, a passenger walkway would be incorporated to connect the Market Street/Florence Avenue Station with the Metro K line across Florence Boulevard, with pedestrian entrance/exit on both sides of Florence Boulevard.
<b>Area 3:</b> Restoration of the Fox Theater in conjunction with revitalization of the Fox Theater block.	<b>Consistent.</b> The proposed Project would connect the local community with the greater Los Angeles region and bring in visitors to downtown and the Fox Theater block. No support columns would be located in front of or adjacent to the Fox Theater and the guideway would have extended clearance to accommodate the vertical pylon sign to promote compatibility of the proposed Project with the historic context of the Fox Theater. The inflow of visitors would economically benefit local businesses, helping revitalize downtown. An increase in transportation option and transportation capacity would connect downtown to the south part of the City as well, likely increasing traffic flow to and from downtown Inglewood and south Inglewood.
<b>Area 12:</b> Linkage between the Metro Station, Downtown, the Forum, Hollywood Park, and the NFL Stadium via a combination of existing and advanced technology local transit systems/people movers.	<b>Consistent.</b> The proposed Project would connect the Metro K line with downtown Inglewood, the Forum, Hollywood Park, and the NFL Stadium using existing technology. The System would provide a reliable and low-cost method of connecting riders from the region to the City.

Source: City of Inglewood. The New Downtown Fairview Heights TOD Plan Design Guidelines. November 2016. <http://inglewood.arrayogroup.com/wp-content/uploads/2017/01/The-New-Downtown-Fairview-Heights-TOD-Plan-Design-Guidelines-lo-res.pdf>.

A study of the potential effects of the ITC Project on the economic viability of downtown Inglewood was prepared by the City.<sup>31</sup> This study reviewed the current economic conditions of downtown Inglewood and analyzed the potential impact of the ITC on downtown Inglewood.

Analysis of market data found that the current market and economic performance of downtown Inglewood is modest compared to other high performing downtowns in the region. Retail vacancies in downtown Inglewood have remained above average retail vacancies in the City and the county for the

31 Analysis of potential impacts on economic viability of Downtown Inglewood as a result of the proposed Inglewood Transit Connector, September 16, 2021, HR&A Advisors, Inc.

last 10 years. In that period, downtown retail vacancies have ranged between 7 and 14 percent, while retail vacancies in the City and the county hovered around 5 percent. A similar trend is observed in retail rents, where average lease rates in downtown Inglewood are 17 and 38 percent lower than those Citywide and countywide, respectively.

Some of the key physical characteristics of high performing downtowns and retail districts identified in this study include good access using multiple modes of transportation, unobstructed visibility of storefronts for drivers and pedestrians, safe and well-lit areas during all hours, and a high-quality public realm (i.e., public improvements including streets, sidewalks, and landscaping).

Prior to the pandemic, visitation to downtown was approximately 4,500 visitors per day, with most of these visits related to daytime employment and occurring during the weekday. Currently, 45 percent of downtown visitors come from within a 10-minute drive. With a projected average daily ITC ridership of approximately 8,400 people, there will be additional visitors to downtown. If 10 to 20 percent of these riders visit downtown Inglewood, this would represent an increase of approximately 840 to 1,670 visitors per day. This would represent an increase of up to 37 percent above the 4,500 daily visitors.

The additional public parking proposed at the Market Street/Florence Avenue Station, consisting of 650 spaces, may also help increase the number of visitors to downtown on a daily basis. By providing an easy to use transit connection to other parts of Inglewood where event venues and new development is planned, such as the Hollywood Park Specific Plan area, visitors to downtown during the evening and at nighttime, when current activity in downtown is lowest would also increase.

The increase in visitors that will be generated by the ITC Project are expected to represent a wider cross section of the region, which would potentially diversify downtown's current visitor base. In addition, the greater share of this new visitor market segment will be during evenings and weekends, further introducing opportunities for existing and new businesses to expand their hours of activity throughout the week and at different times of the day.

The improvements to the public realm proposed as part of the Project, such as landscaping and lighting, has the potential to increase small business performance, increasing sales and reducing vacancies. The proposed streetscape and public realm improvements will also assist in integrating the ITC improvements into downtown Inglewood in a manner that supports the City's current revitalization efforts.

The conclusion of this economic study is that the ITC Project will not negatively impact the factors, including access and parking, visibility and safety, and quality of the public realm that will contribute to the economic viability of downtown Inglewood. This study also included a review of elevated transit systems with similar design features implemented in U.S. cities, which found no evidence that the introduction of these systems alone may lead to economic decline in downtowns. There is a potential for

temporary effects on economic conditions in downtown during the approximate 46-month construction period for the Project. As noted under Impact LU-1, the Construction Commitment Program includes a Business and Community Support Program and a Business Interruption Assistance Program to assist all businesses financially affected by construction activities. This Program includes the following components:

- 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 effects.
- 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.

Implementation of the Business and Community Support Program will minimize the potential for temporary effects on local businesses during construction. Additionally, as part of the Construction Commitment Program, the City is committed to providing financial assistance to small local businesses to help offset to the extent possible, business revenue losses or increased expenses that are directly attributable to disruptions during the construction of the ITC within the ITC Project area. The City will create a \$5 million dollar Business Assistance Fund to provide financial assistance through grants to eligible businesses for eligible expenses as established by the Business Assistance Fund Program Administrator.

For these reasons, it is not expected that the Project will result in business closures or vacancies. If any commercial property vacancies occur along the proposed alignment, these vacancies are expected to be short term and would not result in changes to the character of the community that would result in physical impacts to the environment that would be significant.

The economic analysis concludes that implementation of the ITC Project presents opportunities to improve the existing economic conditions in downtown Inglewood, consistent with City's current plans and goals for downtown Inglewood.

#### **Transportation Corridor Overlay Zone**

The Transportation Corridor Overlay Zone implements the goals and policies of the General Plan related to the addition of the proposed Project to the City's circulation system. Development of the proposed Project within the TC Overlay Zone would provide the downtown with a unique mix of accessibility options including light rail, pedestrians, buses, and advanced technology local transit. The TC Overlay Zone would also allow transit and pedestrian connection to the Metro Rail. Aerial development of transit conserves limited land within the urban environment which furthers additional goals for conservative use of land within the City.

The TC Overlay Zone allows for pedestrian improvements and ADA compliance upgrades which the proposed Project would implement. Upgraded pedestrian facilities would add to the existing pedestrian network and provide additional public spaces. Lastly, the transit connections provided by the TC Overlay Zone would promote local entertainment and commercial centers, boosting local economy and local businesses.

The TC Overlay Zone would implement goals and policies of the existing General Plan and is consistent with the General Plan for this reason. No significant land use impacts would result from the adoption of the Transportation Corridor Overlay Zone.

#### **Medical Enterprise Overlay Zone Amendment**

The proposed amendment to the Medical Overlay Zone would exclude the proposed sites for the Prairie Avenue/Manchester Boulevard and Prairie Avenue/Hardy Street stations and associated components of the Project on the west side of Prairie Avenue not located within the public right-of-way.

This amendment would be limited to these properties. The Medical Enterprise Overlay Zone would continue to apply to all other properties in the Overlay Zone and this overlay would continue to effectively implement the City's General Plan. For this reason, this amendment would not result in any significant land use impacts.

#### **Hollywood Park Specific Plan Amendment**

The HPSP area is located northeast of Prairie Avenue and Century Boulevard with Pincay Drive to the north. The purpose of the HPSP is to define the land use framework for the redevelopment of the 298-acre Hollywood Park site with a mix of parks, stadium, retail, office, housing, entertainment, gaming, hotel, and civic uses. The HPSP:

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- Determines the appropriate location and intensity of development, mix of land uses and building heights to be constructed in the Specific Plan area;
- Guides the character of the land planning to ensure that high-quality, place making improvements are made to create a safe and inviting, pedestrian-oriented, regional retail destination not currently available in the area;
- Establishes public and private sector implementation measures and responsibilities that adequately address both local and regional impacts; and
- Defines the future locations and dimensions of streets, rights-of-ways, or other access ways.

To accommodate the ATS while maintaining the existing roadway capacity along Prairie Avenue, the ITC Project includes the proposed relocation of one existing traffic lane on the east side of Prairie Avenue. The relocated lane would be accommodated within a maximum thirty (30) foot variable easement for street purposes, to be acquired by the City over private property that currently comprises the existing required maximum 30-foot setback area along the west edge of the HPSP area. While existing sidewalk widths along Prairie Avenue would be maintained, landscaping, signs and other streetscape improvements would need to be reduced or eliminated in certain areas, following the property acquisition.

As described above, an amendment to the HPSP is proposed to address any potential conflict or inconsistency with the HPSP that may result from the shift of one lane of Prairie Avenue a maximum of thirty (30) feet into the existing setback area on the east side of Prairie Avenue in the HPSP area and the associated reconfiguration of the existing sidewalk, landscape and other improvements that would be affected. For example, the amendment would eliminate the requirement for a 30-foot setback along the western edge of the HPSP to allow zero-lot line development. Accordingly, future buildings and structures within the HPSP area adjacent to Prairie Avenue would be permitted to be built along the existing setback property line without requiring any additional setback along Prairie Avenue. Subterranean parking and certain structures, such as balconies, would be allowed to encroach within City’s easement areas, to minimize the loss of the setback area on future development. Consistent with the proposed TC Overlay Zone, any area previously used to satisfy the minimum setback requirement shall continue to be counted within any density or Floor Area Ratio (FAR) calculations under the Specific Plan for existing and future development purposes, even though it may have been dedicated as a public right-of-way. Additionally, the proposed amendment would allow for the routine closures of 2 interior streets, Champions Way and Touchdown Drive, on event days to reduce pedestrian conflicts with vehicles within designated areas.

The proposed Project would be implemented through the TC Overlay Zone while supporting the HPSP development through the enhancement of local multimodal transportation including the upgrade of pedestrian facilities and providing transit. The proposed Project would connect the development with the

4.9 Land Use and Planning

region, connecting residents and visitors to the regional retail, entertainment, and sports venues within the HPSP area. In terms of development, the TC Overlay Zone would complement development allowed by the underlying zone classification with any facilities associated with the ATS system including the gateway, stations, MSF, PDS, vertical circulation elements, walkways, bridges.

A consistency analysis is presented in **Table 4.9-6: Project Consistency with Hollywood Park Specific Plan**, which shows that, the Project would support and be generally consistent with the HPSP.<sup>32</sup> In addition, the proposed amendment to the HPSP would also be consistent with the goals and principles of the HPSP by accommodating the ITC Project, including the shift of one travel lane into the existing HPSP area setback along Prairie Avenue without affecting existing and future development permitted by the HPSP. The construction and operation of the proposed Project would not conflict with any of the applicable principles and goals included in the HPSP or obstruct implementation of the HPSP. The analysis in this section and within **Table 4.9-6** shows the proposed Project would no conflict with, or obstruct implementation of, the HPSP.

**Table 4.9-6  
Project Consistency with Hollywood Park Specific Plan**

Principles and Goals	Project Consistency
<b>Transportation</b>	
Provide pedestrian connections from Hollywood Park to major transit corridors on Century Boulevard and Prairie Avenue.	<b>Consistent.</b> The proposed Project includes a pedestrian connection from the Prairie Avenue/Hardy Street Station over Prairie Avenue to Hollywood Park. The existing sidewalk on the east side of Prairie Avenue and associated streetscape improvements that would be affected by the shift of one travel lane east by a maximum of thirty (30) feet into the existing setback area will be replaced to maintain the pedestrian circulation system on Prairie Avenue. The change to associated standards included in the proposed amendment to the HPSP would maintain the pedestrian circulation network along Prairie Avenue.
Reduce reliance on the private automobile by enhancing opportunities for transit ridership, walking and biking.	<b>Consistent.</b> The proposed Project would reduce congestion on the existing roadway system by reducing overall vehicle miles traveled and providing an increase in local transit options. By providing a connection to the Metro K line, the ITC Project would enhance opportunities for alternative transportation and reduce reliance on the private automobile. The Project would also support the full amount of development approved in the General Plan for Hollywood Park. The proposed modifications to Prairie Avenue, including shifting one travel lane to the east and modifying the existing

32 City of Inglewood. *Hollywood Park Specific Plan* (2009, amended 2014, amended 2015). <https://www.cityofinglewood.org/DocumentCenter/View/1347/Hollywood-Park-Specific-Plan>.

Principles and Goals	Project Consistency
	streetscape improvements on the west side of Prairie Avenue, and the associated amendment to standards in the HPSP to accommodate these improvements would include pedestrian and bicycle facilities. The proposed HPSP amendment would allow for the routine closures of 2 interior streets, Champions Way and Touchdown Drive, on event days to reduce pedestrian conflicts with vehicles within designated areas, which would enhance pedestrian circulation to and from the Project.
Reduce traffic compared to other developments by providing a mix of commercial, entertainment, restaurant, residential and park uses in proximity to each other and to existing transit routes.	<b>Consistent.</b> The proposed Project would provide an additional transit option near the commercial, entertainment, restaurants, residential and park uses allowed by the HPSP. The Prairie Avenue/Hardy Street station includes a direct pedestrian connection to the HPSP area, which will reduce traffic and reduce overall vehicle miles traveled compared to other developments. The Project would also support the full amount of development approved in the General Plan for Hollywood Park.
Development Standards	
<b>§ 2.6 and § 6.2.5 - Minimum Building Setbacks:</b> The required minimum setbacks for the HPSP are shown in Exhibit 6-5—Minimum Building Setbacks. The intent of the setback requirements is to reinforce and protect the character of the public streets and to create a pedestrian-scaled street scene. Also, the setbacks provide a landscape buffer from the surrounding development.	<b>Consistent.</b> The proposed Project would amend the HPSP to eliminate the requirement for a 30-foot setback along the western edge of the HPSP along Prairie Avenue to allow zero-lot line development. Accordingly, future buildings and structures within the HPSP would be permitted to be built along the existing property line without requiring any additional setback along Prairie Avenue. Subterranean parking and certain structures, such as balconies, would be allowed to encroach within City’s easement areas, to minimize the loss of the setback area on future development.
<b>§ 2.15 and § 6.2.14 – Signage:</b> The purpose of the HPSP signage requirements is to allow signage to create an identity for the HPSP area. Exceptions to the HPSP signage requirements are established for development within the Sports and Entertainment Zone. For example, outside of the Sports and Entertainment Zone, the size of mural graphics within the HPSP may not exceed 75% of the building face or wall, or 1,000 SF per mural, whichever is less. This requirement does not apply within the Sports and Entertainment Zone.	<b>Consistent.</b> The proposed Project would amend the HPSP to clarify that signage within the TC Overlay Zone on property that is also located within the HPSP boundaries must adhere to the signage requirements set forth in section 2.15 of the HPSP and that the exceptions for the Sports and Entertainment Zone recognized in the HPSP do not apply within the TC Overlay Zone.
Streetscapes	
<b>§ 3.3.2 – Streetscapes:</b> Street trees and parkways in Hollywood Park are designed to achieve a diverse urban forest, to integrate Hollywood Park with the adjoining urban fabric and to assist in developing districts of distinctive and appropriate character.	<b>Consistent.</b> The proposed Project would amend the HPSP to clarify that property within the TC Overlay Zone that overlaps with the HPSP boundaries must adhere, to the maximum extent feasible, to the streetscape requirements set forth in the HPSP, including the standards set forth in the following exhibits to the HPSP: Exhibit 3-30 (Prairie Avenue), Exhibit 3-52 (Prairie Avenue Landscape Setback), and Exhibit 3-53 (Prairie Avenue/Century Boulevard Setback).

Principles and Goals	Project Consistency
Design Guideline Checklist	
– Pedestrian and vehicular circulation routes shall comply with all requirements of the Americans with Disabilities Act (ADA), and include one or more of the following design elements along all or a portion of all streets or pedestrian pathways: (1) pedestrian pathway includes a pattern, color, or paving material that is differentiated from surrounding landscaping or paved areas; (2) way-finding signage; (3) the streets and pathways are oriented such that they include verifiable lines of sight that would allow both pedestrians and vehicles to see any one or more of the following: (a) Stadium, (b) performance venue, casino, retail or residential gateway, or (c) Champion Plaza, Lake Park, Arroyo Park, or Bluff Park.	<b>Consistent.</b> Pedestrian facilities along the guideway, and adjacent to stations adjacent to the HPSP area would be improved to comply with all ADA requirements. The elevated passenger walkway would be made of a different paving material than those of the surrounding paved areas and way finding signage would be installed where appropriate. Elevated passenger walkways to the east of the guideway and stations will provide lines of sight to the HPSP area and, depending on location, could include the Stadium, the performance venue and/or the retail or residential gateway.
– The exterior entryways of buildings shall include one or more of the following: (1) a trim or border of a different color or material than other portions of the façade; (2) an integral porch; (3) an awning; (4) an articulated entryway offset from the immediately adjacent façade by not less than one foot; or (5) an arched opening.	<b>Consistent.</b> The proposed Stations would incorporate distinguishing features, such as distinctive canopies that do not detract from the surroundings, that are generally consistent with the HPSP Design Guidelines
– When using more than one material on a façade (except as a trim or offset portion of the façade or as an entry or window treatment), the variation in materials shall continue to all side and rear elevations that are visible from the front or corner lot line.	<b>Consistent.</b> As defined in the Design Guidelines, materials used on the stations would be neutral in tone and would include color accents only where appropriate. The façade of the stations would not be incompatible with the HPSP.
Each building shall include one or more of the following: – Entry or window trim/surrounds – Horizontal banding – Corner quoins – Balconies (supported, cantilevered or Juliet) – False, shuttered windows – Awnings – Change in material or color	<b>Consistent.</b> Stations will be visibly compatible with the standards articulated in the HPSP Design Guidelines. Under the Design Guidelines, stations will be identifiable, distinctive and streamlined.
Railings shall be constructed of wood, wrought iron, or other material, such as stucco, which is used to construct the façade or entry or window trim on the same building.	<b>Consistent.</b> The materials chosen for station railings would be consistent with the other station materials as defined in the Design Guidelines in a manner that is generally consistent with the HPSP Design Guidelines.
Exposed gutters and downspouts shall be colored or painted, and shall not be constructed of unpainted aluminum, copper, or zinc.	<b>Consistent.</b> Exposed gutters along Prairie Avenue would be painted or colored as defined in the Design Guidelines in a manner that is generally consistent with the HPSP Design Guidelines.
Stairs shall be constructed of the same material as the deck and landing.	<b>Consistent.</b> Station stairs would be constructed of the same material as the deck and landing as defined in the Design Guidelines in a manner that is generally consistent with the HPSP Design Guidelines.

4.9 Land Use and Planning

Principles and Goals	Project Consistency
Columns and posts shall be constructed of stone, stucco, or wood (or other material painted or molded to look like one of the allowed materials) and shall be not less than four inches in diameter if round, or four inches on each side if rectangular.	<b>Consistent.</b> Columns and posts would be constructed of materials used elsewhere in the station as defined in the Design Guidelines in a manner that is generally consistent with the HPSP Design Guidelines.
<b>Sustainability</b>	
<b>Goal 1:</b> Create a more sustainable community	<b>Consistent.</b> The proposed Project would reduce vehicle miles traveled and traffic congestion on the street network, which will improve both local and regional air quality. Additionally, the Design Guidelines outlines sustainability measures including energy efficiency, addressing heat island effect, use of recycled water and rainwater, and recycling of demolished materials in a manner that is generally consistent with the HPSP Design Guidelines.
<b>Goal 2:</b> Respect the site.	<b>Consistent.</b> Under the Design Guidelines, landscape designs will prioritize the use of drought-resistant plants, which would be consistent with the landscape areas and plants provided by the HPSP. The proposed amendment to the HPSP includes minor revisions to development standards along Prairie Avenue to accommodate the street improvements included in the Project in a manner that is compatible with the planned conditions within the HPSP area.
<b>Goal 3:</b> Save water and reduce local water impacts.	<b>Consistent.</b> The Water Efficiency and Conservation Objective of the Design Guidelines is consistent with the HPSP Sustainability Goals.
<b>Goal 4:</b> Reduce, reuse, recycle.	<b>Consistent.</b> The Material Conservation and Resource Efficiency Objective of the Design Guidelines is consistent with the HPSP Sustainability Goals.
<b>Goal 5:</b> Make concrete with sustainable materials.	<b>Consistent.</b> The Material Conservation and Resource Efficiency Objective of the Design Guidelines is consistent with the HPSP Sustainability Goals.
<b>Goal 6:</b> Design to save wood and labor.	<b>Consistent.</b> The proposed Project would use an integrated design approach that brings together all, applicable, major design disciplines including architecture, planning, structural, landscape, mechanical, electrical, and plumbing engineers and other specialists to collaborate on the most effective way to meet programmatic goals with lowest lifecycle environmental impacts in a manner that is generally consistent with the HPSP Sustainability Goals.
<b>Goal 7:</b> Support sustainable forests.	<b>Consistent.</b> The proposed Project would use an integrated design approach that brings together all, applicable, major design disciplines including architecture, planning, structural, landscape, mechanical, electrical and plumbing engineers and other specialists to collaborate on the most effective way to meet programmatic goals with lowest lifecycle environmental impacts in a manner that is generally consistent with the HPSP Sustainability Goals.

4.9 Land Use and Planning

Principles and Goals	Project Consistency
<b>Goal 8:</b> Make a sustainable roof.	<b>Consistent.</b> The Design Guidelines provide that to achieve energy use reduction, passive strategies taking advantage of the favorable local climate should be considered where feasible. The MSF and PDS substation roof surfaces will be light in color to reduce the urban heat island effect. These features of the Project are generally consistent with the HPSP Sustainability Goals.
<b>Goal 9:</b> Save energy through passive design.	<b>Consistent.</b> Designs with passive reductions to energy use would be preferred for the proposed Project, which generally consistent with the HPSP Sustainability Goals.
<b>Goal 10:</b> Save water and energy in plumbing systems.	<b>Consistent.</b> The Water Efficiency and Conservation Objective and the Energy Objective of the Design Guidelines are The proposed Project would utilize rainwater or gray-water for toilet flushing as feasible. Low flow fixtures including low flow faucets would be used to reduce water and energy consumption within the plumbing system. These features of the Project are generally consistent with the HPSP Sustainability Goals.
<b>Goal 11:</b> Save energy in lighting.	<b>Consistent.</b> The Energy Efficiency Objective of the Design Guidelines, the purpose of which is to achieve energy efficiency and maximize the use of renewable energy in the Project above and beyond minimum code requirements is generally consistent with the HPSP Sustainability Goals.
<b>Goal 12:</b> Save energy in equipment use.	<b>Consistent.</b> Sustainability measures to reduce energy use of equipment would be incorporated into the proposed Project. Measures include using Tier 4 construction equipment (See <b>Section 4.5: Energy</b> ). Further, the Energy Efficiency Objective of the Design Guidelines would achieve energy efficiency and maximize the use of renewable energy in the Project above and beyond minimum code requirements. e These features of the Project are generally consistent with the HPSP Sustainability Goals.
<b>Goal 13:</b> Create healthy indoor environments	<b>Consistent.</b> The Design Guidelines include measures to provide maximum natural daylighting and access to views of the outdoors. Further, under the Design Guidelines, indoor spaces should use high efficiency air filtration and should create a comfortable indoor acoustical environment and materials and systems should be selected that will provide for a healthy indoor environment. These features and guidelines of the Project are generally consistent with the HPSP Sustainability Goals.
<b>Goal 14:</b> Replace fossil fuel use with alternatives.	<b>Consistent.</b> Sustainability measures to reduce energy use of equipment would be incorporated into the proposed Project. Measures include using Tier 4 construction equipment (See <b>Section 4.5: Energy</b> ). Further, the Energy Efficiency Objective of the Design Guidelines would achieve energy efficiency and maximize the use of renewable energy in the Project above and beyond minimum code requirements. These features of the

Principles and Goals	Project Consistency
	Project are generally consistent with the HPSP Sustainability Goals.
<b>Goal 15:</b> Support market for recycled materials.	<b>Consistent.</b> The Material Conservation and Resource Efficiency Objective of the Design Guidelines is generally consistent with the HPSP Sustainability Goals.
<b>Goal 16:</b> Use creativity and innovation to build sustainable environments.	<b>Consistent.</b> The proposed Project uses existing technology to provide transit service and remove vehicles off of the existing roadway network. The guideway would be elevated to allow existing roadway capacity to remain while improvements to sidewalks would promote alternative transportation and an active lifestyle in the local community. The Project would be generally consistent with this HPSP goal and facilitate the ability of development in the HPSP area to meet this goal.

Source: City of Inglewood. Hollywood Park Specific Plan. (July 2009, amended 2014, amended 2015). <https://www.cityofinglewood.org/DocumentCenter/View/1347/Hollywood-Park-Specific-Plan>. Accessed October 5, 2021.

**The Forum Development Agreement**

The proposed relocation of one existing traffic lane on the east side of Prairie Avenue would be accommodated within a 30-foot street easement to be acquired along the western edge of the Forum Property. The proposed street improvements would eliminate approximately 250-300 of the existing parking spaces in the Forum Parking lot located along Prairie Avenue.

The amount of parking required for a use is a land use regulatory matter and the direct impact of a proposed project on existing parking is not considered an impact under the California Environmental Quality Act. Effects on parking is considered a social impact under CEQA and not an environmental impact unless the effect on parking would result in specific significant secondary effects on the physical environment. The small amount of parking spaces that may be eliminated as a result of the ITC Project would not result in secondary impacts on the environment, as the amount of parking remaining on the Forum site would be adequate to meet parking demands of events held at the Forum, especially given the increased transit ridership from the ITC Project anticipated for events at the Forum. The Project may also include an amendment to the Forum Development Agreement to confirm that as a regulatory matter the amount of parking left post-acquisition will be sufficient and the Forum can continue to operate without an additional parking supply.

**Summary of Impacts**

A project is considered to be consistent with a general plan and related planning documents if, considering all its aspects, it will further the objectives and policies of the plan or not obstruct their attainment. As discussed above, the proposed Project would be consistent with applicable plans, policies, and

regulations, and 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. As demonstrated in this section, the proposed Project (including the proposed General Plan Amendment, TC Overlay Zone, Hollywood Specific Park Amendment, property acquisitions and easements) would further the objectives and policies of applicable regional and local plans or will not obstruct the attainment of the goals of these plans, and therefore, the proposed Project’s impacts would be less than significant.

**Mitigation Measures**

Impact is less than significant. No mitigation measures required.

**Level of Significance after Mitigation**

Impact is less than significant. No mitigation measures required.

**4.9.7 CUMULATIVE IMPACTS**

A cumulative impact analysis for land use evaluates whether impacts of a project and related projects, when taken as a whole, would have significant environmental impacts under the two land use thresholds. The geographic scope of this cumulative impact analysis is the community, City, and the region. If the related projects identified in **Section 4.0, 4.0.6: Cumulative Assumptions** in combination with the proposed Project would result in a cumulatively significant impact, then the significance of the proposed Project’s incremental contribution to that cumulatively significant impact must be determined. The City is currently planning to build a parking structure, containing up to 2,500 spaces in six-level structure, on the City’s ITF site located on the southeast corner of Prairie Avenue and Arbor Vitae Street. This parking structure would provide additional public parking near event venues in the LASED in the HPSP area and for the IBEC. The ITF site is currently improved as a surface parking lot and bus transit facility. This parking structure would facilitate flexibility during events at the venues in the area. During non-event times, this parking would be available as a park-and-ride facility to connect to the Metro rail system via the ITC Project. Developing this parking structure on the site of the existing ITF would provide additional public parking to support the existing and planned land uses.

As analyzed above within this section, the proposed Project would not create a physical division in the community. Potential future related projects, including the parking structure planned on the ITF site, would not create physical divisions in the community, in the City, or in the region. Therefore, the proposed Project, in combination with related projects, would not cause a significant cumulative impact related to the physical division of an established community.

#### 4.9 Land Use and Planning

The related projects would be required to be consistent with all applicable planning documents. The proposed Project, with the proposed amendments to the General Plan, IMC, and HPSP would also be consistent with existing policies, plans, and programs. Therefore, the proposed Project, in combination with related projects, would not cause a cumulatively significant impact related to inconsistencies with existing policies, plans, and programs.

#### 4.9.8 CONSISTENCY WITH CITY OF INGLEWOOD GENERAL PLAN

As discussed in the analysis provided above, the proposed Project is consistent with the City of Inglewood General Plan with the proposed regulatory changes included in the Project. For General Plan consistency analysis regarding specific topic areas, please refer to the chapters addressing those topic areas. No additional analysis is required.

## 4.10 NOISE AND VIBRATION

### 4.10.1 INTRODUCTION

This section of the Recirculated Draft Environmental Impact Report (Recirculated Draft EIR) addresses construction and operational noise and vibration impacts associated with the proposed Project as modified and refined since the December 2020 Draft EIR. This section evaluates the potential for temporary impacts associated with operation of construction equipment and associated activities, as well as the potential for long-term impacts from operation of the proposed ATS system and changes in traffic volumes on streets in the area that would result from the Project.

Since release of the December 2020 Draft EIR, the City has modified the design of the Project along the proposed alignment as a result of consultation with key stakeholders in the community, as described in **Section 1.0: Introduction**. In addition, the Project Construction Commitment Program (CCP) has been refined to further control noise generated during construction. The construction noise reduction measures within the CCP have been incorporated in the analysis below.

Prior to the preparation of the December 2020 Draft EIR, a Revised Initial Study was prepared using the CEQA Environmental Checklist Form to assess potential environmental impacts associated with noise. For one of the screening thresholds, the Initial Study found that the proposed Project would result in “No Impact” and thus, no further analysis of this topic in an EIR was required. The following Initial Study screening criteria related to noise do not require any additional analysis in this Recirculated Draft EIR:

- For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Similar to the December 2020 Draft EIR, the changes to the design of the Project do not create the potential for significant impacts related to location as the general area of the proposed Project would remain by the Metro K Line to the north; Hardy Street to the south; the Los Angeles Stadium and Entertainment District (LASED) at Hollywood Park including SoFi stadium, and the Forum to the east; and La Brea Avenue to the west. The nearest public use airport to the proposed Project is LAX. There are no private airstrips located in the vicinity of the proposed Project.

Impacts found to be less than significant are further discussed in **Section 6.3: Effects Found Not to be Significant**.

The data, assumptions, and modeling outputs used in the analyses of this Recirculated Draft EIR are provided below. Additional existing ambient noise measurements (**Appendix N**) were not taken for

preparation of this Recirculated Draft EIR as the data continues to reflect existing conditions for purposes this analysis.

- Ambient Noise Measurements - **Appendix N.1:**
  - Long-Term (24-hour) Ambient Noise Measurements – **Appendix N.1-1**
  - Short-Term (1-hour) Ambient Noise Measurements (Daytime) – **Appendix N.1-2**
  - Short-Term (15-minute) Ambient Noise Measurements (Nighttime) – **Appendix N.1-3**
- Roadway Noise Levels – **Appendix N.2:**
  - Adjusted Baseline Conditions During Typical Non-Event Weekdays Without ITC Project Count Conversions – **Appendix N.2-1**
  - Adjusted Baseline Conditions During Typical Non-Event Weekdays With ITC Project Count Conversions – **Appendix N.2-2**
  - Opening Year (2027) Conditions With NFL Event Without ITC Project Count Conversions – **Appendix N.2-3**
  - Opening Year (2027) Conditions With NFL Event With ITC Project Count Conversions – **Appendix N.2-4**
  - Future Horizon Year (2045) Conditions With NFL Event Without ITC Project Count Conversions – **Appendix N.2-5**
  - Future Horizon Year (2045) Conditions With NFL Event With ITC Project Count Conversions – **Appendix N.2-6**
  - Roadway Noise Level Tables – **Appendix N.2-7**
- Vibration Monitoring Data Sheets – **Appendix N.3**
- Construction Noise Worksheets- **Appendix N.4:**
  - Construction Sound Power Level Worksheets – **Appendix N.4-1**
  - Construction Noise (Phase 1) Worksheets – **Appendix N.4-2**
  - Construction Noise (Phase 2) Worksheets – **Appendix N.4-3**
  - Construction Noise (Phase 3) Worksheets – **Appendix N.4-4**
  - Construction Noise (Phase 4) Worksheets – **Appendix N.4-5**
  - Construction Noise (Phase 5) Worksheets – **Appendix N.4-6**
  - Construction Noise (Phase 6) Worksheets – **Appendix N.4-7**
  - Construction Noise (Phase 7) Worksheets – **Appendix N.4-8**
  - Construction Noise (Phase 8) Worksheets – **Appendix N.4-9**
- Construction Vibration Worksheets – **Appendix N.5**

- Operational Noise Worksheets – **Appendix N.6:**
  - Maintenance and Storage Facility (MSF) Stationary Source Worksheets – **Appendix N.6-1**
  - Guideway Worksheets – **Appendix N.6-2**

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Recirculated Draft EIR.

## 4.10.2 OVERVIEW OF NOISE AND VIBRATION

### 4.10.2.1 Noise Descriptors

Noise levels are measured using a variety of scientific metrics. As a result of extensive research into the characteristics of noise and human response, standard noise descriptors have been developed for noise exposure analyses. All noise levels provided in this analysis are for outdoor conditions, unless otherwise stated specifically to be interior noise levels.

**A-Weighted Sound Pressure Level (dBA):** The decibel (dB) is a unit used to describe sound pressure level. When expressed in dBA, the sound has been filtered to reduce the effect of very low and very high frequency sounds, much as the human ear filters sound frequencies. Without this filtering, calculated and measured sound levels would include events that the human ear cannot hear (e.g., dog whistles and low-frequency sounds, such as the groaning sounds emanating from large buildings with changes in temperature and wind). With A-weighting, calculations and sound-monitoring equipment approximate the sensitivity of the human ear to sounds of different frequencies.

**Maximum Noise Level (Lmax):** Lmax is the maximum or peak sound level during a noise event. The metric accounts only for the instantaneous peak intensity of the sound, and not for the duration of the event. As a vehicle passes by an observer, the sound level increases to a maximum level and then decreases. Some sound level meters measure and record the maximum or Lmax level.

**Sound Exposure Level (SEL):** SEL, expressed in dBA, is a time-integrated measure, expressed in decibels, of the sound energy of a single noise event at a reference duration of 1 second. The sound level is integrated over the period that the level exceeds a threshold. Therefore, SEL accounts for both the maximum sound level and the duration of the sound. The standardization of discrete noise events into a 1-second duration allows calculation of the cumulative noise exposure of a series of noise events that occur over a period of time.

**Equivalent Continuous Noise Level (Leq):** Leq is the sound level, expressed in dBA, of a steady sound that has the same A-weighted sound energy as the time-varying sound over the averaging period. Unlike SEL, Leq is the average sound level for a specified time period (e.g., 24 hours, 8 hours, 1 hour). Leq is calculated

by integrating the sound energy from all noise events over a given time period and applying a factor for the number of events. Leq can be expressed for any time interval; for example, the Leq representing an averaged level over an 8-hour period would be expressed as Leq(8).

**Community Noise Equivalent Level (CNEL):** CNEL, expressed in dBA, is the standard metric used in California to represent cumulative noise exposure. The metric provides a single-number description of the sound energy to which a person or community is exposed over a period of 24 hours similar to day-night average sound level (DNL). CNEL includes penalties applied to noise events occurring after 7:00 PM and before 7:00 AM, when noise is considered more intrusive. The penalized time period is further subdivided into an evening period (7:00 PM through 10:00 PM) with an addition of 5 dBA to measured noise levels and a nighttime period (10:00 PM to 7:00 AM) with an addition of 10 dB to measured noise levels. The evening weighting is the only difference between CNEL and DNL.

#### 4.10.2.2 Groundborne Noise

Groundborne noise refers to noise generated by groundborne vibration. More specifically, groundborne noise is the low-frequency rumbling noise emanating from the motion of building room surfaces due to the vibration of floors and walls; it is perceptible only inside buildings.<sup>1</sup> The relationship between groundborne vibration (discussed in *Section 4.10.2.3*, directly below) and groundborne noise depends on the frequency content of the vibration and the acoustical absorption characteristics of the receiving room. For typical buildings, groundborne vibration that causes low frequency noise (i.e., the vibration spectrum peak is less than 30 Hz) results in a groundborne noise levels that is approximately 50 decibels lower than the velocity level. For groundborne vibration that causes mid-frequency noise (i.e., the vibration spectrum peak is between 30 and 60 Hz), the groundborne noise level will be approximately 35 dB lower than the velocity level. For groundborne vibration that causes high-frequency noise (i.e., the vibration spectrum peak is greater than 60 Hz), the groundborne noise level will be approximately 20 dB lower than the velocity level.<sup>2</sup> Therefore, for typical buildings, the groundborne noise decibel level is lower than the groundborne vibration velocity level at low frequencies.

#### 4.10.2.3 Groundborne Vibration

Ground-borne vibration is the perceptible movement of building floors, rattling windows, and doors, shaking of items on shelves or walls, and rumbling sounds. The root mean square (RMS) amplitude of a motion over a 1-second period is commonly used to predict human response to vibration. The motion due to ground-borne vibration is described in vibration velocity levels, measured in decibels referenced to 1

<sup>1</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, p. 112, September 2018, accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf)

<sup>3</sup> City of Inglewood, IMC, Chapter 5 Offenses, Miscellaneous, "Article 2. Noise Regulations," Section 5-26. Noise Level Measurement Criteria.

microinch per second and expressed as vibration decibels (VdB). Ground-borne vibration is not a common environmental problem unlike roadway noise or transit noise. The vibration source levels for various types of construction equipment would be based on data provided in Table 7-4 of the Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual*.

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. While ground vibrations from construction activities do not often reach the levels that can damage structures, fragile buildings must receive special consideration.

#### 4.10.2.4 Effects of Noise on Humans

Human response to sound is highly individualized. Annoyance is the most common issue associated with community noise levels. Many factors influence the response to noise including the character of the noise, the variability of the sound level, the presence of tones or impulses, and the time of day of the occurrence. Additionally, non-acoustical factors, such as individual opinion of the noise source, the ability to adapt to the noise, the attitude towards the source and those associated with it, and the predictability of the noise, all influence the response to noise. These factors result in the reaction to noise being highly subjective, with the perceived effect of a particular noise varying widely among individuals in a community. The effects of noise can be grouped into three general categories:

- Subjective effects of annoyance, nuisance, dissatisfaction;
- Interference with activities such as speech, sleep, and learning; and
- Physiological effects such as starting hearing loss.

Noise-induced hearing loss usually takes years to develop. Hearing loss is one of the most obvious and easily quantifiable effects of excessive exposure to noise. While the loss may be temporary at first, it can become permanent after continued exposure. When combined with hearing loss associated with aging, the amount of hearing loss directly due to the environment is difficult to quantify. Although the major cause of noise induced hearing loss is occupational, nonoccupational sources may also be a factor.

Noise can mask important sounds and disrupt communication between individuals in a variety of settings. This process can cause anything from a slight irritation to a serious safety hazard, depending on the circumstance. Noise can disrupt face-to-face communication and telephone communication, and the enjoyment of music and television in the home. Interference with communication has proved to be one of the most important components of noise-related annoyance.

Noise-induced sleep interference is one of the critical components of community annoyance. Sound level, frequency distribution, duration, repetition, and variability can make it difficult to fall asleep and may cause momentary shifts in the natural sleep pattern or level of sleep. It can produce short-term effects, with the possibility of more serious effects on health if it continues over long periods.

Annoyance can be defined as the expression of negative feelings resulting from interference with activities, as well as the disruption of one's peace of mind and the enjoyment of one's environment. The consequences of noise-induced annoyance are privately held dissatisfaction, publicly expressed complaints to authorities, and potential adverse health effects, as discussed previously.

Some common sounds on the dBA scale, relative to ordinary conversation, are provided in **Table 4.10-1: Common Sounds on the A-Weighted Decibel Scale**. As shown, the relative perceived loudness of sound doubles for each increase of 10 dBA, although a 10 dBA change corresponds to a factor of 10 in relative sound energy. Generally, sounds with differences of 3 dBA or less are not perceived to be noticeably different by most listeners.

**Table 4.10-1**  
**Common Sounds on the A-Weighted Decibel Scale**

Sound	Sound Level (dBA)	Subjective Evaluations
Near Jet Engine	140	
Threshold of Pain	130	Deafening
Rock music, with amplifier	120	
Thunder, snowmobile (operator)	110	
Boiler shop, power mower	100	Very Loud
Orchestral crescendo at 25 feet, noisy kitchen	90	
Busy street	80	Loud
Interior of department store	70	
Ordinary conversation, 3 feet away	60	Moderate
Quiet automobiles at low speed	50	
Average office	40	Faint
City residence	30	
Quiet country residence	20	
Rustle of leaves	10	Very Faint
Threshold of hearing	0	

Source: U.S. Department of Housing and Urban Development, *Aircraft Noise Impact – Planning Guidelines for Local Agencies*, 1972

Note:

<sup>1</sup> Continuous exposure above 85 dB is likely to degrade the hearing of most people (hearing protection recommended).

<sup>2</sup> Range of Speech: 50 – 70 dB

## 4.10.3 METHODOLOGY

### 4.10.3.1 Noise Measurements

Noise measurements were collected pursuant to Section 5-26 of the Inglewood Municipal Code (IMC),<sup>3</sup> which states that sound level meters (SLMs) shall meet the American National Standard Institute's (ANSI) standard S1.4-1971<sup>4</sup> for Type 1 sound level meters, or by using an instrument with associated recording and analyzing equipment that would provide equivalent data. The SLMs were field calibrated before the measurements and have annual calibration records traceable to the National Institute of Standards and Technology.<sup>5</sup>

A Type 1 (precision) Larson Davis Model 831 SLM<sup>6</sup> was used to conduct the noise monitoring survey. This meter meets all requirements of ANSI S1.4-1983 and ANSI 1.43-1997 Type 1 standards,<sup>7</sup> as well as International Electrotechnical Commission (IEC)<sup>8</sup> and IEC 60804 Type 1, Group X standards.<sup>9</sup> The SLM was located approximately 5 feet above-ground and covered with a Larson Davis windscreen. The SLM was field calibrated with an external calibrator prior to operation.

Noise measurements were taken to establish ambient noise conditions for three time periods. Locations and data measurements are discussed in *Section 4.10.5.2* and shown in **Figure 4.10-5**. 24-hour ambient noise measurements were collected between November 14, 2018, to November 16, 2018, (refer to **Appendix N-1.1**). Short-term (1-hour) ambient noise measurements were collected between November 26, 2018, to January 23, 2019, during the morning peak hours (7:00 AM to 10:00 AM) and evening peak hours (4:00 PM – 7:00 PM) (refer to **Appendix N-1.2**). Short-term (15-minute) ambient noise measurements were collected between August 3, 2020, to August 5, 2020, during the nighttime period after 8:00 PM (refer to **Appendix N-1.3**). It is important to note, short-term ambient noise measurements were collected during the “Safer at Home” order that went into effect in March 2020 due to the COVID-19 pandemic. For quality assurance, gathered nighttime noise measurements were compared to the results of the existing average daily traffic volumes that occurred prior to “Safer at Home”. As shown in data sets provided later in this section, nighttime noise measurements taken along the study intersections were

<sup>3</sup> City of Inglewood, IMC, Chapter 5 Offenses, Miscellaneous, “Article 2. Noise Regulations,” Section 5-26. Noise Level Measurement Criteria.

<sup>4</sup> American Institute of Physics for the Acoustical Society of America, American National Standard Specification for Sound Level Meters (1992).

<sup>5</sup> NIST Handbook, State Weights and Measures Laboratories Program Handbook, March 2003, accessed September 2021, <https://www.nist.gov/system/files/documents/2017/04/28/hb143-03-final.pdf>

<sup>6</sup> Larson Davis Model 831 SLM, <http://www.larsondavis.com/support/slmsupport/model831>.

<sup>7</sup> American Institute of Physics for the Acoustical Society of America, American National Standard Specification for Sound Level Meters (1992).

<sup>8</sup> International Electrotechnical Commission (IEC), IEC 61672-1 Ed. 1.0, IEC 60651. Ed 1.2.

<sup>9</sup> Larson Davis, 831 Advanced Sound Level Meter for Architectural, Environmental, & Product Noise Analysis, [http://www.larsondavis.com/contentstore/mktg/LD\\_Downloads/831\\_Lowres.pdf](http://www.larsondavis.com/contentstore/mktg/LD_Downloads/831_Lowres.pdf).

similar to the conditions calculated from the existing average daily traffic volumes that were calculated before the COVID-19 pandemic.

**4.10.3.2 Construction Noise and Vibration**

This section addresses the methodology to assess potential noise and vibration impacts associated with operating equipment and construction-related traffic during the various phases of construction. The construction traffic and equipment assumptions are provided in the **Appendix 3.0.4: Inglewood Transit Connector Project Baseline Construction Phasing Narrative, August 2021**. The construction footprint for each phase is described in *Section 4.10.7* of this topical section.

Federal methodologies for assessing noise and vibration impact are defined in the FTA's *Transit Noise and Vibration Impact Assessment Manual*. As updated in 2018, the FTA Assessment Manual provides procedures and impact criteria for noise and vibration from transit sources and the criteria apply to transit projects that seek federal funds.

These criteria include procedures for evaluating transit projects, including guidelines for evaluating the impact of operational noise on sensitive land uses as shown in **Table 4.10-2: FTA Land Use Categories and Metrics for Transit Noise Impact Criteria**.

**Table 4.10-2  
Land Use Categories and Metrics for Transit Noise Impact Criteria**

Land Use Category	Land Use Type	Noise Metric, dBA	Description of Land Use Category
1	High Sensitivity	Outdoor Leq (1hr) <sup>1</sup>	Land where quiet is an essential element of its intended purpose. Example land uses include preserved land for serenity and quiet, outdoor amphitheaters and concert pavilions, and national historic landmarks with considerable outdoor use. Recording studios and concert halls are also included in this category.
2	Residential	Outdoor DNL	This category is applicable all residential land use and buildings where people normally sleep, such as hotels and hospitals.
3	Institutional	Outdoor Leq (1hr) <sup>1</sup>	This category is applicable to institutional land uses with primarily daytime and evening use. Example land uses include schools, libraries, theaters, and churches where it is important to avoid interference with such activities as speech, meditation, and concentration on reading material. Places for meditation or study associated with cemeteries, monuments, museums, campgrounds, and recreational facilities are also included in this category.

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018

Note:

<sup>1</sup> Leq(1hr) for the loudest hour of project-related activity during hours of noise sensitivity.

Additionally, the FTA Assessment Manual provides guidance on how to evaluate the level of impact of noise levels from transit projects in relation to human annoyance, as shown in **Table 4.10-3: FTA Levels of Impact**.

**Table 4.10-3  
FTA Levels of Impact**

Level of Impact	Description
No Impact	Project-generated noise is not likely to cause community annoyance. Noise projections in this range are considered acceptable by FTA and mitigation is not required.
Moderate Impact	Project-generated noise in this range is considered to cause impact at the threshold of measurable annoyance. Moderate impacts serve as an alert to project planners for potential adverse impacts and complaints from the community. Mitigation should be considered at this level of impact based on project specifics and details concerning the affected properties.
Severe Impact	Project-generated noise in this range is likely to cause a high level of community annoyance. The project sponsor should first evaluate alternative locations/alignments to determine whether it is feasible to avoid severe impacts altogether. In densely populated urban areas, evaluation of alternative locations may reveal a trade-off of affected groups, particularly for surface rail alignments. Projects that are characterized as point sources rather than line sources often present greater opportunity for selecting alternative sites. This guidance manual and FTA's environmental impact regulations both encourage project sites which are compatible with surrounding development when possible. If it is not practical to avoid severe impacts by changing the location of the project, mitigation measures must be considered.

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

The FTA Assessment Manual identifies noise significance thresholds which are a function of existing ambient noise levels and the land use category of sensitive receptors. As illustrated in **Figure 4.10-1: FTA Noise Impact Criteria for Transit Projects**, the thresholds at which a moderate or severe impact occur vary as the existing noise environment changes. The FTA Assessment Manual also provides guidance on evaluating cumulative noise impacts.

According to the FTA Assessment Manual, project construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of construction, and the adjacent land use. As such, the FTA Assessment Manual provides the following reasonable criteria for assessment for residential, commercial, and industrial land uses:

- Residential: 90 dBA Leq (1-hour) during the daytime; 80 dBA Leq (1-hour) during the nighttime.
- Commercial: 100 dBA Leq (1-hour) during the daytime and nighttime.
- Industrial: 100 dBA Leq (1-hour) during the daytime and nighttime.

**Construction Phasing**

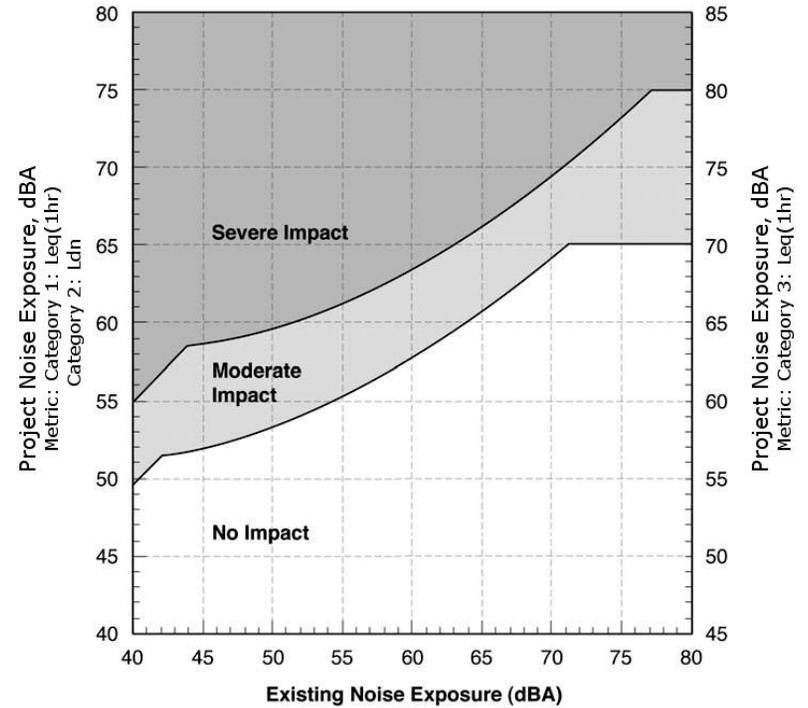
Construction of the proposed Project would occur in eight (8) phases over approximately 46 months between January 2024 and November 2027. It is likely that these construction phases will overlap to provide the most efficient construction schedule once a contractor is selected for the delivery of the proposed Project. The construction phasing described below will likely be refined as design and implementation of the Project progresses and a contractor is selected. A summary description of construction phasing is provided below.

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.

**Phase 1**

Phase 1 would include demolition of buildings and site improvements on properties acquired for construction of the 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. Phase 1 construction would start in January 2024. Phase 1 construction would include the following:

- Demolition of buildings and site improvements on property acquired for the project. As noted below, portions of the areas to be demolished will be used for construction staging.
- Utility locations for protection in place, possible utility relocations, and new utility installation for utilities such as electrical, water, gas, storm drains, sewer, temporary traffic signals, and streetlights.
- 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 Avenue.
- Site preparation for installation of the power distribution system (PDS) substations , electrical equipment, and subsystems will occur at the MSF site and Prairie Avenue/Hardy Street Station Site.
- Installation of the primary power duct bank along Prairie Avenue.
- Installation of the power duct bank for the SCE power feed from the SCE Inglewood Substation to the MSF site.



SOURCE: TRANSIT NOISE AND VIBRATION IMPACT ASSESSMENT MANUAL, FEDERAL TRANSIT ADMINISTRATION

FIGURE 4.10-1



#### 4.10 Noise and Vibration

The properties where existing buildings and site improvements will be demolished include at the existing retail commercial center at Market Street and Regent Street, the commercial buildings located at 500 Manchester Boulevard, the commercial building at 150 S. Market Street on the northeast corner of Manchester and Market Street, the retail commercial center at northwest corner of Prairie Avenue and Hardy Street, , the commercial building at 925 S. Prairie Avenue, and the commercial building at 1003 S. Prairie Avenue.

After demolition, the remaining asphalt flatwork areas at the commercial plaza at Market Street and Regent Street, the commercial building at 150 S. Market Street, and the retail commercial center at northwest corner of Prairie Avenue and Hardy Street, will 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

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 2 construction would occur in 2024 through 2025. Phase 2 construction would include the following:

- Removal of existing sidewalks, roadways, landscaping, and demolition of other improvements as needed along the guideway alignment. This work includes new or temporary pavement and asphalt for road work and sidewalks.
- Utility work including potential relocations, protection in place where feasible, and new utility installations including but not limited to electrical, water, gas, storm drains, sewer, temporary traffic signals, and streetlights.
- Drilling of the foundations for the MSF building.
- Construct new pavement, sidewalks, streetlights, traffic signals, and other infrastructure on Prairie Avenue, and shift the roadway east to its new alignment.
- The installation of a K-Rail system on the west side of Prairie Avenue to delineate the construction area. The K-Rail system will be installed approximately twenty-two feet into the public right-of-way (ROW) from the westerly face of curb on Prairie Avenue, excluding sidewalks, from Hardy Street to Manchester Boulevard and maintained until construction in this area is completed. The area within the K-Rail system will be used for the mobilization of equipment, drilling, crane operations and concrete pump outriggers for the excavation and installation of concrete foundations, concrete piles, single and double concrete columns, beam girders and cantilevered bents for the aerial construction.
- Installation of buildings for the electrical equipment and subsystems at each of the two PDS sites.

#### 4.10 Noise and Vibration

#### Phase 3

Phase 3 would include foundation work for the Automated Transit System (ATS) guideway, foundation work for the Market Street/Florence Ave Station, and construction for the support structure of the MSF building. Phase 3 work will include utility relocation (if necessary), foundations, cast-in-place (CIP) columns, and setting of prefabricated buildings at the PDSs. Phase 3 construction would occur in 2024 through 2025. Phase 3 construction would include the following:

- Utility work including potential relocations, protection in place where feasible, and new utility installations including but not limited to electrical, water, gas, storm drains, sewer, temporary traffic signals, and streetlights.
  - Removal of existing sidewalks, roadways, landscaping, and demolition as needed. This work includes new or temporary pavement and asphalt for road work and sidewalks.
  - The installation of a K-Rail system on the south side of Manchester Boulevard to delineate the construction area. The K-Rail system will be installed approximately twenty-two feet into the public ROW from southerly face of curb, excluding sidewalks, along Manchester Boulevard from Prairie Avenue to Market Street and maintained until construction in this area is completed. The area within the K-Rail system will be used for the mobilization of equipment, drilling, crane operations and concrete pump outriggers for the excavation and installation of concrete foundations, concrete piles, single and double concrete columns, beam girders and cantilevered bents for the aerial construction.
  - Installation of buildings for the electrical equipment and subsystems at each of the two PDS sites.
  - Construction of the support structure, columns, and cross girders for MSF building.
  - The installation of two rows of K-Rail system along Market Street to delineate the construction area. The K-Rail system will be installed approximately twenty-five feet into the public ROW in the center of Market Street, from Manchester Boulevard to Florence Avenue. The area within the K-Rail system will be used for the mobilization of equipment, drilling, crane operations and concrete pump outriggers for the excavation and installation of concrete foundations, concrete piles, single and double concrete columns, beam girders and for supports directly under the guideway.
  - Drill foundations for the ATS guideway along the west side of Prairie Avenue from Hardy Street to Manchester Boulevard, the south side of Manchester Boulevard from Prairie Avenue to Market Street, Market Street from Manchester Boulevard to Florence Avenue.
  - Drill foundations for the Market Street/Florence Ave Station.
  - Drill foundations for the Prairie Ave/Manchester Boulevard Station.
  - Drill foundations for the Prairie Ave/Hardy Street Station.

**Phase 4**

Phase 4 construction would include foundation work for the ATS guideway, guideway column caps along Market Street, and the MSF building deck and shell. Phase 4 activities will include utility relocation (if necessary), foundations, CIP columns, guideway column caps, and installation of equipment at the TPDSS. Phase 4 construction would occur in 2025 through 2026. Phase 4 construction would include the following:

- Removal of existing sidewalks, roadways, landscaping, and demolition of other improvements on Manchester as needed along the guideway alignment. This work includes new or temporary pavement and asphalt for road work and sidewalks.
- Utility work including potential relocations, protection in place where feasible, and new utility installations including but not limited to electrical, water, gas, storm drains, sewer, temporary traffic signals, and streetlights.
- Installation on of the building deck, shell, and steel roof members on the MSF building.
- Construction of the support structure, columns, and cross girders, for Market Street/Florence Ave Station.
- Construction of the support structure, columns, and cross girders, for Prairie Ave/Hardy Street Station.
- Construction of the guideway columns and column caps along Market Street.
- Installation of electrical equipment in the PDS buildings.
- Reconstruct sidewalk, curb, and gutter on the west side of Prairie Avenue and south side of Manchester Boulevard.
- After construction activities on the west side of Prairie Avenue are completed, construction of the east side of Prairie Avenue would begin. A K-rail system would be installed to delineate the construction area on the east side of Prairie Avenue. The K-Rail system will be installed approximately fifteen-feet into the public ROW starting from the easterly face of curb, excluding sidewalk, from Hardy Street to Manchester Boulevard. If needed, a temporary easement or utility setback may be utilized to secure staging areas. The area within the K-Rail system will be used for the installation of foundations, CIP columns, single and double concrete columns, beam girders and cantilevered bents for the aerial construction.
- After construction activities on the south side of Manchester Boulevard are completed, construction of the north side of Manchester Boulevard would begin. A K-rail system would be installed to delineate the construction area on the north side of Manchester Boulevard. The area within the K-Rail system will be used for the installation of foundations, CIP columns, single and double concrete columns, beam girders and cantilevered bents for the aerial construction.
- Drill foundations for the ATS guideway along the east side of Prairie Avenue from Hardy Street to Manchester Boulevard, and the north side of Manchester Boulevard from Prairie Avenue to Market Street

**Phase 5**

Phase 5 construction 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 will include guideway girders, guideway straddle caps, and installation of equipment at the PDSs. Phase 5 construction would occur in 2025 through 2026. Phase 5 construction would include the following:

- Aerial construction of the guideway on Market Street, with precast segments and/or formwork with precast trapezoidal troughs and girders. This work would include temporary closure of Market Street during the following activities for safety measures:
  - During the formwork phase, traffic would not be allowed to pass underneath the structure.
  - Traffic would not be allowed to pass underneath precast segments while they are being moved and set.
  - During formwork and concrete placement of the cast-in-place trapezoidal box trough and/or the uses of precast/prestressed “I” steel girders and platforms, temporary lane closures would be necessary.
  - The staging and holding area for the delivery of precast segments, girders, and beams will be located in the Market Street/Florence Avenue Station staging area; delivery to the construction area may require street closures.
- Construction on the interior of the MSF building.
- Aerial construction of the guideway formwork for Prairie Avenue/Manchester Boulevard Station with precast trapezoidal troughs and steel girders, and construction of platform, mezzanine, and vertical circulation elements.
- Aerial construction of the guideway formwork for Prairie Avenue/Hardy Street Station with precast trapezoidal troughs and steel girders, and construction of platform, mezzanine, and vertical circulation elements.
- Aerial construction of the guideway straddle cap formwork on Manchester Boulevard. This work would include temporary closure of Manchester Boulevard during the following activities for safety measures:
  - During the formwork phase, traffic would not be allowed to pass underneath the structure.
  - During formwork and concrete placement of the cast-in-place trapezoidal box trough and/or the uses of precast/prestressed “I” steel girders and platforms. Temporary lane closures would be necessary.
  - The staging and holding area for the delivery of girders and beams will be located in the MSF staging area; delivery to the construction area may require street closures.

#### 4.10 Noise and Vibration

- Aerial construction of the guideway straddle cap formwork on Prairie Avenue. This work would include temporary closure of Prairie Avenue during the following activities for safety measures:
  - During the formwork phase, traffic would not be allowed to pass underneath the structure.
  - During formwork and concrete placement of the cast-in-place trapezoidal box trough and/or the uses of precast/prestressed “I” steel girders and platforms. Temporary lane closures would be necessary.
  - The staging and holding area for the delivery of girders and beams will be located in the MSF staging area; delivery to the construction area may require street closures.
- Installation of electrical equipment in the PDS buildings.

#### Phase 6

Phase 6 construction 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, completion of Prairie Avenue/Manchester Boulevard Station, completion of Prairie Avenue/Hardy Street Station, and completion of the MSF building, and the elevated passenger walkway to the Metro K Line Downtown Inglewood Station. Phase 6 construction would occur in 2025 through 2026. Phase 6 construction would include the following:

- Aerial construction of the guideway on Manchester Boulevard, with precast segments and/or formwork with precast trapezoidal troughs and girders. This work would include temporary closure of Manchester Boulevard during the following activities for safety measures:
  - During the formwork phase, traffic would not be allowed to pass underneath the structure.
  - Traffic would not be allowed to pass underneath precast segments while they are being moved and set.
  - During formwork and concrete placement of the cast-in-place trapezoidal box trough and/or the uses of precast/prestressed “I” steel girders and platforms. Temporary lane closures would be necessary.
  - The staging and holding area for the delivery of precast segments, girders, and beams will be located in the MSF staging area; delivery to the construction area may require street closures.
- Completion of the MSF facility including building commissioning.
- Aerial construction of the guideway on Prairie Avenue, with precast segments and/or formwork with precast trapezoidal troughs and girders. This work would include temporary closure of Prairie Avenue during the following activities for safety measures:
  - During the formwork phase, traffic would not be allowed to pass underneath the structure.

#### 4.10 Noise and Vibration

- Traffic would not be allowed to pass underneath precast segments while they are being moved and set.
- During formwork and concrete placement of the cast-in-place trapezoidal box trough and/or the uses of precast/prestressed “I” steel girders and platforms. Temporary lane closures would be necessary.
- The staging and holding area for the delivery of precast segments, girders, and beams will be located in the MSF staging area; delivery to the construction area may require street closures.
  - Completion of the electrical equipment in the PDS substation buildings.
  - Aerial construction of the guideway formwork with precast trapezoidal troughs and steel girders, and completion of platform, mezzanine, and vertical circulation elements for Prairie/Manchester Station.
  - Aerial construction of the guideway formwork with precast trapezoidal troughs and steel girders, and completion of platform, mezzanine, and vertical circulation elements for Hardy Station.
  - Construction of the overhead bridge across Florence Avenue, providing a passenger access walkway from the Market Street/Florence Avenue Station to the Metro K Line Downtown Inglewood Station.

#### Phase 7

Phase 7 construction would include final site work and completion of the stations. Phase 7 would occur in 2026. Phase 7 construction would include the following:

- Final site work and paving on Manchester Boulevard.
- Completion of the Prairie Avenue/Hardy Street Station.
- Completion of the Prairie Avenue/Manchester Boulevard Station.
- Completion of the Market Street/Florence Avenue Station.
- Final site work at the MSF site.
- Final site work at the Market Street/Florence Avenue Station.
- Construction of all surface parking lots.
  - Final roadway improvements and modifications, and re-striping of streets as required.

#### Phase 8

Phase 8 construction 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. Phase 8 construction would occur in 2025 through 2027, with the primary construction activities occurring in 2026 and some installation of equipment starting towards the end of Phase 3 construction when sufficient aerial

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structure is available for the installation of the equipment. Phase 8 construction would include the following:

- Installation of the ATS track work.
- Installation, testing, and commissioning of the operation and control systems
- Installation of the station platform equipment and systems, such as platform doors, passenger information systems, and ticket vending.
- Installation, testing, and commissioning of the PDSs and power systems.
- Testing and commissioning of the ATS trains
- Station commissioning.
- This work will involve periodic temporary lane closures as 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.

**Construction Equipment Noise**

Construction activities typically generate noise from the operation of equipment required for demolition, site preparation, grading, construction, paving, and application of architectural coatings. Noise impacts from construction and staging of construction equipment were evaluated by determining cumulative noise levels generated by construction activity, calculating the construction-related noise level at nearby noise-sensitive receptor locations, and comparing these construction-related noise levels to existing ambient noise levels (i.e., noise levels without Project-related construction noise). The actual noise level would vary, depending upon the equipment type, model, the type of work activity being performed, and the condition of the equipment. Over the course of construction, activities would occur over a 16 hour/day schedule with two shifts, either a morning shift from approximately 7:00 AM to 3:00 PM and an evening shift from approximately 3:00 PM to 11:00 PM, or a morning shift from approximately 7:00 AM to 3:00 PM and a night shift from approximately 11:00 PM to 7:00 AM. The night shift would be used for material deliveries, export of soil and debris and other light construction activities. Construction during the nighttime period would require a permit from the Permits and Licenses Committee of the City.

The Construction Phasing Narrative (see **Appendix F**) identifies the anticipated construction equipment for on- and off-site construction activities and is shown in **Table 4.10-4: Proposed Project Anticipated Construction Equipment by Phase**.

**Off-Road On-Site Equipment:** Off-road construction equipment includes dozers, loaders, sweepers, and other heavy-duty construction equipment that is not licensed for travel on public highways.

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**Table 4.10-4  
Proposed Project Anticipated Construction Equipment by Phase**

Equipment	Quantity <sup>a</sup>								Usage Factor (%)	Lmax at 50 feet, dBA
	Phase 1	Phase 2	Phase 3	Phase 4	Phase 5	Phase 6	Phase 7	Phase 8		
<b>Off-Road On-Site Equipment</b>										
Crane	0	1	3	6	6	6	1	0	16	85
Backhoe	3	3	3	3	3	1	1	0	40	80
Loader	3	4	5	3	1	1	0	0	40	80
Auger Drill Rig	0	1	3	3	0	0	0	0	20	85
Compressor (air)	2	2	4	5	4	3	1	0	40	80
Excavator	2	2	2	1	0	0	0	0	40	85
Bobcat	2	2	2	2	2	2	2	0	40	85
Impact Hammer	3	3	3	2	2	0	0	0	20	90
Jackhammer	5	2	2	2	2	0	0	0	20	89
Pneumatic Tools	5	5	10	15	15	10	8	6	50	85
Generator	0	0	2	3	3	2	2	0	50	82
Drum Mixer	0	0	2	2	1	1	0	0	50	80
Drill Rig Truck	0	0	0	0	0	1	2	0	20	84
Concrete Saw	2	1	1	1	1	1	0	0	20	90
Compactor (ground)	0	1	2	1	1	1	4	0	20	83
Portable Light Towers	4	5	5	5	2	2	0	0	N/A	55
MKN Lifts	3	8	8	6	6	2	0	0	20	75
<b>On-Road On-Site Equipment</b>										
Demo Dump Trucks (Total)	1,400	300	0	0	0	0	0	0	40	76
Asphalt Removal Trucks (Total)	25	20	25	0	0	0	0	0	40	76
Asphalt Placement Trucks (Total)	0	40	20	0	20	50	85	0	40	76
Soil Spoils Dump Trucks (Total)	305	1,913	2,015	1,157	153	0	0	0	40	76
Utility Trucks	7	12	25	25	25	18	12	5	N/A	75
Welder/Torch	2	4	4	2	2	2	2	2	40	73
Water Truck	4	4	4	3	3	2	2	0	N/A	74
Street Sweeper	1	1	1	1	1	1	1	1	N/A	74
Flat Bed Trucks	20	20	65	30	30	30	20	10	40	74
Pneumatic Tools	5	7	20	10	10	10	7	5	50	85

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Equipment	Quantity <sup>a</sup>								Lmax at 50 feet, dBA	
	Phase 1	Phase 2	Phase 3	Phase 4	Phase 5	Phase 6	Phase 7	Phase 8		Usage Factor (%)
Concrete Trucks (Total)	0	653	6,112	6,453	5,823	3,584	1,153	0	40	85
Concrete Pump Trucks	0	2	3	3	2	2	0	0	20	84
<b>On-Road Off-Site Equipment</b>										
Pickup Trucks	10	20	40	50	50	40	30	30	40	75
Delivery Trucks	10	10	40	40	40	40	20	20	N/A	80

Source: Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) Version 1.1

a - Appendix F Construction Phasing Narrative for the EIR.

Note: Usage Factor (%) is an acoustical usage factor to assume for modeling purposes. Emission Limit: The time that the equipment is connected to individual noise sources. Lmax at 50 feet: Noise emission level at 50 feet from the piece of equipment.

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**On-Road On-Site Equipment:** On-road on-site equipment on-site water trucks, dump trucks, haul trucks and other on-road vehicles licensed to travel on public roadways.

**On-Road Off-Site Equipment:** On-road on-site equipment includes shuttle vans transporting construction employees to and from the site(s), on-site pick-up trucks, and crew vans

**Construction Noise Modeling**

The following were used to calculate construction noise levels:

- Ambient noise levels at surrounding noise-sensitive receptor locations were modeled based on existing noise in proximity to the nearby noise-sensitive receptors.
- Typical noise levels for each type of construction equipment were obtained from the Federal Highway Administration’s (FHWA) Roadway Construction Noise Model (RCNM). A sample of typical construction equipment noise levels is shown in **Table 4.10-4**.

An inventory of possible construction equipment, including number and types of equipment, was identified for each phase/component of construction and all equipment was assumed to operate simultaneously. It is highly unlikely that all pieces of construction equipment identified in **Table 4.10-4** would operate simultaneously in any specific location during construction because equipment is generally operated only when needed and space constraints limit the equipment that can be used at any one time in a specific location. Therefore, this modeling approach is considered a conservative approach to calculate the maximum noise levels that would be generated.

Moreover, as discussed more fully below, the project proposes PDF-NOISE-1 Construction Noise Control Plan as part of the Construction Commitment Program for the project. PDF-NOISE-1 requires the contractor to prepare a Construction Noise Control Plan, and to incorporate numerous measures as construction requirements that will reduce construction noise, such as installing noise barriers and muffling equipment. The noise modeling reported below does not account for these noise-reducing project features. The calculated average sound power levels (refer to **Appendix N-4.1**) were inputted as area sources into the SoundPLAN model<sup>10</sup> each for the eight (8) construction phases:

- Phase 1: 84.8 dBA (Leq-1hour) per square meter (dB/m, m<sup>2</sup>) with an Lmax of 85.4 dBA
- Phase 2: 83.1 dBA (Leq-1hour) dB/m, m<sup>2</sup> with an Lmax of 84.9 dBA
- Phase 3: 84.1 dBA (Leq-1hour) dB/m, m<sup>2</sup> with an Lmax of 84.6 dBA
- Phase 4: 84.7 dBA (Leq-1hour) dB/m, m<sup>2</sup> with an Lmax of 84.6 dBA

<sup>10</sup> SoundPLAN model is in compliance with ISO 9613-2 standards for assessing attenuation of sound propagating outdoors and general calculation method.

- e) Phase 5: 84.9 dBA (Leq-1hour) dB/m, m<sup>2</sup> with an Lmax of 84.8 dBA
- f) Phase 6: 83.0 dBA (Leq-1hour) dB/m, m<sup>2</sup> with an Lmax of 82.3 dBA
- g) Phase 7: 84.0 dBA (Leq-1hour) dB/m, m<sup>2</sup> with an Lmax of 82.1 dBA
- h) Phase 8: 90.0 dBA (Leq-1hour) dB/m, m<sup>2</sup> with an Lmax of 85.2 dBA

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.

Construction traffic and equipment noise levels were calculated for noise-sensitive receptor locations (see **Section 4.0: Environmental Impact Analysis, 4.0.6 Sensitive Receptors**) based on the conventional standard point source noise-distance attenuation factor of 4.5 to 6.0 dBA for each doubling of distance. Construction noise levels were quantified at predetermined distances from the site using the L<sub>eq</sub> metric.

Calculated noise levels associated with the proposed Project's construction at noise-sensitive receptor locations were then compared to estimated existing noise levels and the construction noise significance thresholds.

**Table 4.10-5: Estimate of Hourly Construction Activity Levels** presents the construction activity shifts that would occur during the 24-hour period. Construction activity would primarily occur over a 16 hour daily schedule with two shifts, either a Morning/Evening shift from approximately 7:00 AM to 3:00 PM and an evening shift from approximately 3:00 PM to 11:00 PM, or a Morning/Night shift from approximately 7:00 AM to 3:00 PM during the day and a night shift from approximately 11:00 PM to 7:00 AM.<sup>11</sup> There will be periods when construction activities are scheduled to occur from approximately 11:00 PM to 7:00 AM to accommodate work activities that cannot be accomplished during the daytime shifts (i.e., during large-scale pours of concrete when it would be necessary to maintain a continuous stream of concrete deliveries through multiple shifts). Construction work is assumed to occur seven days a week.

For purposes of this analysis, a hybrid construction shift was derived from **Table 4.10-5** to calculate maximum construction noise levels. Conservatively, the construction noise analysis assumed the equipment use activity factor for morning/night shift during the nighttime period (10:00 PM – 6:59 AM), morning/evening shift during the daytime period (7:00 AM – 6:59 PM), and the morning/evening shift during the evening period (7:00 PM – 9:59 PM). 24-hour CNEL, daytime (7:00 AM to 8:00 PM) and nighttime (8:00 PM to 7:00 AM) construction noise levels are provided in **Appendix N.4-2** through **4.10.4-5** for each construction phase. Maximum hourly construction noise levels are provided in the tables below.

<sup>11</sup> **Appendix F:** Construction Phasing Narrative for this Recirculated Draft EIR, August 2021.

Due to site constraints, primarily 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 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 in order to minimize impacts to daily commuter traffic and potential event traffic. Delivery of construction materials would occur during the night shift, as would most lane closures. Construction activities during the day shift would primarily consist of work that could proceed without requiring lane closures or significant 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. An adjusted workload intensity is assumed for these periods of minor activity.

**Table 4.10-5**  
**Estimate of Hourly Construction Activity Levels**

	Hour	Equipment Use Activity Factor	
		Morning/Evening Shift (7:00 AM – 3:00 PM, 3:00 PM – 11:00 PM)	Morning/Night Shift (7:00 AM – 3:00 PM, 11:00 PM – 7:00 AM)
Nighttime	12:00 AM – 1:00 AM	25%	50%
	1:00 AM – 2:00 AM	25%	50%
	2:00 AM – 3:00 AM	25%	50%
	3:00 AM – 4:00 AM	25%	50%
	4:00 AM – 5:00 AM	25%	50%
	5:00 AM – 6:00 AM	25%	50%
Daytime	6:00 AM – 6:59 AM	25%	50%
	7:00 AM – 8:00 AM	100%	100%
	8:00 AM – 9:00 AM	100%	100%
	9:00 AM – 10:00 AM	100%	100%
	10:00 AM – 11:00 AM	100%	100%
	11:00 AM – 12:00 PM	100%	100%
	12:00 PM – 1:00 PM	100%	100%
	1:00 PM – 2:00 PM	100%	100%
	2:00 PM – 3:00 PM	100%	100%
	3:00 PM – 4:00 PM	100%	50%
	4:00 PM – 5:00 PM	100%	50%
	5:00 PM – 6:00 PM	100%	50%
Evening	6:00 PM – 6:59 PM	100%	50%
	7:00 PM – 8:00 PM	75%	38%
	8:00 PM – 9:00 PM	75%	38%
Nighttime	9:00 PM – 9:59 PM	75%	38%
	10:00 PM – 11:00 PM	50%	25%
	11:00 PM – 12:00 AM	25%	50%

Source: **Appendix F:** Construction Phasing Narrative for the EIR, August 2021.

Construction equipment noise was evaluated by determining the noise levels generated by typical outdoor construction activity and calculating the potential for exposure to noise-sensitive uses. Construction equipment noise impacts were assessed by identifying the closest noise-sensitive receptors to each construction area.

### **Construction Traffic Noise**

The analysis of construction traffic noise impacts focuses on off-site Project construction activity by:

- Identifying major roadways that may be used for construction worker commute routes or truck haul routes;
- Identifying the nature and location of noise-sensitive receptors along those routes; and
- Evaluating the traffic characteristics along those routes, specifically as related to existing traffic volumes.

The primary haul and delivery routes include Florence Avenue, Manchester Boulevard, Prairie Avenue and Century Boulevard which have been designated by the City as Truck Routes.<sup>12</sup> To minimize traffic impacts to streets in and around the proposed Project area, excavated dirt materials/spoils will be hauled during off-peak and night hours.

Construction traffic volume data was provided for multiple segments along each roadway. According to FHWA, traffic noise levels increase by 3 dBA where traffic volumes double (100 percent increase). Therefore, where Project construction traffic along a haul route results in the doubling of ADT, a significant impact would occur.

### **Construction Equipment Vibration**

For quantitative construction vibration assessments related to building damage and human annoyance, vibration source levels for construction equipment were taken from the FTA *Transit Noise and Vibration Impact Assessment Manual*.<sup>13</sup> Building damage would be assessed for each piece of equipment individually and assessed in terms of peak particle velocity (PPV). Ground-borne vibration related to human annoyance is assessed in terms of rms velocity levels.

Ground-borne vibration measurements (refer to **Appendix N.3**) were collected in accordance with FTA guidance<sup>14</sup> at each of the five noise monitoring locations that were measured over a 24-hour period. Outdoor field measurements were taken using remote monitoring systems and an accelerometer on

<sup>12</sup> City Municipal Code, Section 3-85. Truck Routes Established.

<sup>13</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018, accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf)

<sup>14</sup> FTA *Transit Noise and Vibration Impact Assessment Manual*.

November 16, 2018. Accelerometers were placed on smooth surfaces on the ground to ensure that vertical vibration was accurately captured. The vibration intervals were set to 1 second at each location.

Existing vibration monitoring was conducted to provide data on ambient ground-borne vibration generated by traffic and operation of activities. The locations of the vibration monitoring selected were either adjacent to sensitive land uses (residences and hotels) or buildings that were close to where the components of the proposed Project would be constructed. Vibration data was acquired with a flat frequency response range from 6 Hertz (Hz) to 400 Hz.

### **4.10.3.3 Operational Noise and Vibration**

This section addresses the methodology to assess potential noise impacts associated with changes in roadway traffic attributable to the operation of the proposed Project. Additionally, this section addresses noise and vibration impacts associated with operation of trains and stationary uses (MSF and PDSS).

#### **Traffic Noise**

The analysis evaluates the extent to which ambient exterior noise levels at noise-sensitive uses located along major roadways within the Project vicinity may change due to traffic associated with the operation of the proposed Project, and noise generated from the ATS trains and stationary sources such as the MSF.

The noise evaluation addressed the following scenarios:

- Adjusted Baseline Conditions during typical non-event Weekday without the ITC Project
- Adjusted Baseline Conditions during typical non-event Weekday with the ITC Project
- Opening Year (2027) Conditions with NFL event Weekday without the ITC Project
- Opening Year (2027) Conditions with NFL event Weekday with the ITC Project
- Future Horizon Year (2045) Conditions with NFL event Weekday without the ITC Project
- Future Horizon Year (2045) Conditions with NFL event Weekday with the ITC Project

#### **Traffic Data Conversions**

The traffic study (see **Appendix O**) evaluated an extensive network of roadway intersections to be assessed for increases in traffic volumes within the area surrounding the proposed Project. Existing ADTs were estimated using the validated Inglewood Travel Demand Forecasting Model (ITDF). The ITDF Model was utilized along with existing transportation networks for each of the four time periods (AM, Mid-Day, PM, Nighttime) and the associated socio-economic database consistent with the SCAG 2020–2045 RTP/SCS Regional Model. The results for all four time periods were aggregated to reflect the average daily conditions. The resulting ADT volumes reflect typical weekday operations under the existing (2020) conditions.

4.10 Noise

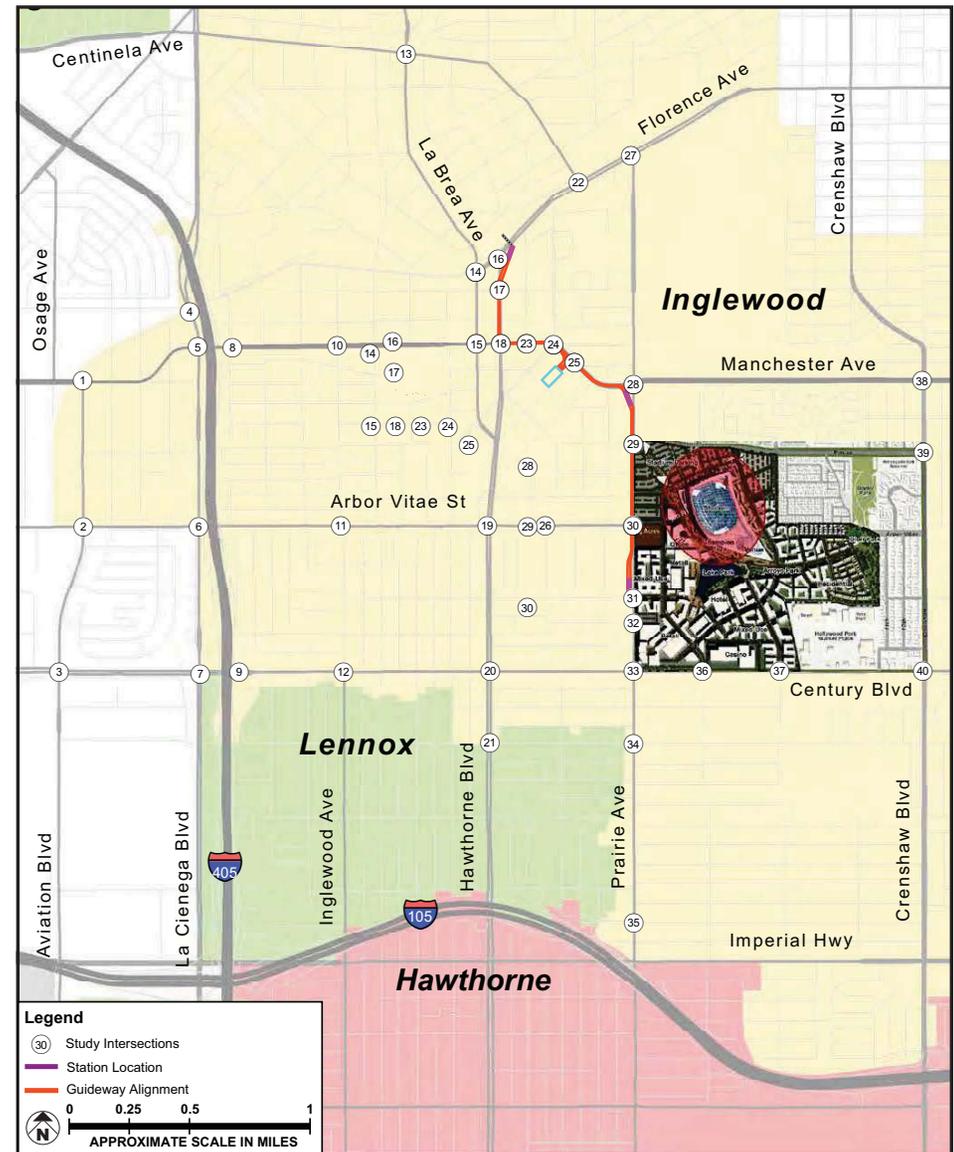
This area is generally bound by Florence Avenue to the north, Century Boulevard and 104<sup>th</sup> Street to the south, Crenshaw Boulevard to the east and La Brea Avenue to the west. A total of 26 intersections were studied that may be subjected to an increase or decrease in ambient roadway traffic noise as a result of the proposed Project (see **Appendix O**). These intersections are identified on **Table 4.10-6: Proposed Project Study Intersections** and shown on **Figure 4.10-2: Traffic Study Areas and Intersections**. At each intersection, turning movements were recorded during the morning and afternoon peak traffic hours. The collected turning movement data was converted into estimated road traffic noise levels using the FHWA traffic noise model (TNM) methodology.<sup>15</sup>

**Table 4.10-6  
Proposed Project Study Intersections**

Map ID	Intersection
1	La Brea Avenue & Florence Avenue
2	La Brea Avenue & Manchester Boulevard
3	Market Street & Florence Avenue
4	Market Street & Regent Street
5	Market Street & Manchester Avenue
6	La Brea Avenue & Arbor Vitae Street
7	La Brea Avenue & Century Boulevard
8	Hawthorne Boulevard & 104th Street
9	Centinela Avenue & Florence Avenue
10	Locust Street & Manchester Avenue
11	Hillcrest Boulevard & Manchester Boulevard
12	Spruce Avenue & Manchester Boulevard
13	Myrtle Avenue & Arbor Vitae Street
14	Prairie Avenue & Florence Avenue
15	Prairie Avenue & Manchester Boulevard
16	Prairie Avenue & Kelso Street/Pincay Drive
17	Prairie Avenue & Arbor Vitae Street
18	Prairie Avenue & Hardy Street
19	Prairie Avenue & 97th Street
20	Prairie Avenue & Century Boulevard
21	Prairie Avenue & 104th Street
22	Doty Avenue & Century Boulevard
23	Yukon Avenue & Century Boulevard
24	Crenshaw Boulevard & Manchester Boulevard
25	Crenshaw Boulevard & Pincay Drive/90th Street
26	Crenshaw Boulevard & Century Boulevard

Source: Raju Associates, Transportation Study 2021, **Appendix O**.

15 Federal Highway Administration, Traffic Noise Model Version 2.5, [https://www.fhwa.dot.gov/environment/noise/traffic\\_noise\\_model/tnm\\_v25/](https://www.fhwa.dot.gov/environment/noise/traffic_noise_model/tnm_v25/).



SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021

**FIGURE 4.10-2**



251-003-20

**Traffic Study Areas and Intersections**

### Traffic Volume Data

The process of assessing potential road traffic noise impacts that would be generated by implementation of the Project requires that estimates of current road traffic noise levels be prepared to establish existing conditions as a baseline for noise impact analyses. The traffic turning movement counts collected as part of the Transportation Study (see **Appendix O**) were used to calculate estimates of daytime (7:00 AM to 10:00 PM) and nighttime (10:00 PM to 7:00 AM) ADT volumes on the roadway segments between traffic study intersections (refer to **Appendix N.2-1**). These ADT values were inputted into the FHWA traffic noise model.

### Traffic Noise Modeling

Traffic volume and road parameter data were inputted via the SoundPLAN<sup>16</sup> noise model to the FHWA TNM 2.5 model,<sup>17</sup> which is the road traffic noise model preferred by the California Department of Transportation (Caltrans). The TNM model calculates the average noise levels at the specific locations based on nearby roadway traffic volumes, average vehicle speeds, roadway geometry, and physical site conditions. The modeled noise levels for each of the scenarios described above is the average CNEL<sup>18</sup> calculated for the daytime and nighttime periods by the model for sensitive receptors assumed to be located adjacent to the street. These values represent the maximum potential noise levels to which sensitive receptors could be exposed to from road traffic noise.

### FTA Vibration Guidelines

The FTA has published a technical manual, *Transit Noise and Vibration Impacts Assessment Manual*, which provides ground-borne vibration impact criteria with respect to building damage during construction activities.<sup>19</sup> Building vibration damage is measured in PPV. According to the FTA guidelines, a vibration criterion of 0.20 PPV should be considered as the significant impact level for nonengineered timber and masonry buildings. Structures or buildings constructed of reinforced concrete, steel, or timber have a vibration damage criterion of 0.50 PPV based on the FTA guidelines.

The human reaction to various levels of vibration is highly subjective and varies from person to person.

**Table 4.10-7: Ground-borne Vibration Criteria—Human Annoyance** shows the FTA's vibration criteria to evaluate vibration-related annoyance due to resonances of the structural components of a building. These

<sup>16</sup> SoundPLAN <https://www.soundplan.eu/en/>

<sup>17</sup> Federal Highway Administration, Traffic Noise Model Version 2.5, [https://www.fhwa.dot.gov/environment/noise/traffic\\_noise\\_model/tnm\\_v25/](https://www.fhwa.dot.gov/environment/noise/traffic_noise_model/tnm_v25/).

<sup>18</sup> Community Noise Equivalent Level (CNEL) is a weighted average of noise level over time. It is used to compare the noisiness of neighborhoods. CNEL is frequently used in regulations of airport noise impact on the surrounding community. A CNEL exceeding 65db is generally considered unacceptable for a residential neighborhood.

<sup>19</sup> Federal Transit Administration (USDOT, FTA), *Transit Noise and Vibration Impact Assessment*, FTA report no. 0123 (September 2018), accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf).

criteria are based on extensive research that suggests humans are sensitive to vibration velocities in the range of 8 to 80 Hz.<sup>20</sup>

Structures amplify ground-borne vibration, and wood-frame buildings, such as typical residential structures, are more affected by ground vibration than are heavier buildings. The level at which ground-borne vibration is strong enough to cause architectural damage has not been determined conclusively. The most conservative estimates are reflected in the FTA standards, shown in **Table 4.10-8: Ground-borne Vibration Criteria—Architectural Damage**.<sup>21</sup>

**Table 4.10-7**  
**Ground-borne Vibration Criteria—Human Annoyance**

Land Use Category	Max Lv (VdB)	Description
Workshop	90	Distinctly felt vibration; appropriate to workshops and non-sensitive areas
Office	84	Felt vibration; appropriate to offices and non-sensitive areas
Residential: Daytime	78	Barely felt vibration; adequate for computer equipment
Residential: Nighttime	72	Vibration not felt, but ground-borne noise may be audible inside quiet rooms

Source: United States Department of Transportation, Federal Transportation Authority, *Transit Noise and Vibration Impact Assessment (May 2006)*.

Note: For Max Lv (VdB), Lv is the velocity level in decibels as measured in 1/3 octave bands of frequency over the frequency ranges of 8 to 80 Hz

**Table 4.10-8**  
**Ground-borne Vibration Criteria—Architectural Damage**

Building Category	PPV (ips)	Lv (VdB)
I. Reinforced concrete, steel, or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Nonengineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90

Source: United States Department of Transportation, Federal Transportation Authority, *Transit Noise and Vibration Impact Assessment (May 2006)*.

Note: For Max Lv (VdB), Lv = the velocity level in decibels as measured in 1/3 octave bands of frequency over the frequency ranges of 8 to 80 Hz; VdB = vibration decibels; Hz = hertz; ips = inches per second.

<sup>20</sup> Federal Transit Administration (USDOT, FTA), *Transit Noise and Vibration Impact Assessment Manual*, FTA report no. 0123 (September 2018), accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf).

<sup>21</sup> Federal Transit Administration (USDOT, FTA), *Transit Noise and Vibration Impact Assessment Manual*, FTA report no. 0123 (September 2018), accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf).

### Transit Noise and Vibration

The proposed Project will be a “pinched loop” system, whereby trains operate back and forth from the Market Street/Florence Avenue Station to the Prairie Avenue/Hardy Street Station, stopping at each station along the way and reversing at “turnbacks” at each end of the system.<sup>22</sup> Trains will crossover to the adjacent guideway prior to entering the Market Street/Florence Avenue Station and reverse direction when leaving the station. At the Prairie Avenue/Hardy Street Station end of the line, trains will also crossover prior to entering the station and reverse direction when leaving the station.

The proposed Project is planned to operate from 6:00 AM to 11:59 PM (midnight) for normal weekday/weekend service, with the possibility to add trains and extend hours, as needed, to serve special events. Generally, additional service will be provided before the start of an event to bring passengers to the venue, and again at the end of the event to bring passengers back to the Metro K Line.

As part of the proposed Project, the Operating Systems Report<sup>23</sup> technical requirements identified large, automated monorail, and rubber-tire ATS trains as the technology to be maintained for consideration. The review confirmed that rubber-tire ATS train and large automated monorail technologies are applicable and appropriate for the proposed Project. The requirements for rubber-tire ATS train and large monorail technologies were used in this analysis.<sup>24</sup>

The ATS trains would be either a rubber-tire, steel-wheel system, or a monorail system, or a cable or pulley system. The technical requirements for large, automated monorail, rubber-tire ATS train, and automated steel-wheel/steel-rail, also known as automated light rail transit (ALRT) were reviewed against the public rights of-way and property availability to determine the technologies best applicable for the proposed Project. While rubber tired ATS trains, including monorail systems, can meet the defined physical requirements for the Project, steel wheel/steel rail technologies and cable or pulley systems may also be viable provided this technology can comply with the defined requirements for the Project, including the ability to fit within the defined physical space available for the Project and maximum limits on noise. A steel wheel/steel rail or cable or pulley system may be applied to the project provided it can be demonstrated that the noise that would be generated by this system would be within the maximum limits defined for rubber tired ATS Systems in the ASCE APM Standards Section 2.2.1, Exterior Airborne Noise, ASCE 21-05.<sup>25</sup> Accordingly if steel wheel/steel rail technologies or cable or pulley systems are applied, the

22 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021. Section 5, System Operations.

23 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021. Section 3, Technology Assessment.

24 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021. Section 3, Technology Assessment.

25 American Society of Civil Engineers, Automated People Mover Standards – Part 2 Section 2.2.1, Exterior Airborne Noise, ASCE 21-05.

Project the noise levels generated would not be greater than the noise levels from a rubber tire system. As required by PDF-Noise-3, the exterior noise level generated by the ATS train, with all contributing noise sources in operation, would not exceed the levels specified in Section 2.2.1, Exterior Airborne Noise, ASCE 21-05.

The estimated fleet size considers the operating fleet, which is the number of vehicles required to provide the necessary line capacity to meet the projected demand, as well as the spare fleet, comprised of the hot standby and maintenance trains to ensure that the number of trains required for operations is always available.<sup>26</sup> Rubber-tire ATS train are typically used at airports around the world as well as urban areas. Typical characteristics of such ATS trains include speeds of up to 50 miles per hour and vehicle dimensions of approximately 40 to 42 feet long and approximately 9 feet wide.<sup>27</sup> Monorail technologies are typically used in urban environments. Typical characteristics of both ATS trains and monorails include train speeds of up to 50 miles per hour and vehicle dimensions of approximately 55 to 65 feet long by approximately 9.5 feet to 10.3 feet wide.<sup>28</sup>

### Exterior ATS Train Noise

Noise from ATS trains is generated primarily from electric control systems and traction (electric) motors, gear systems, wind shear, and contact between wheels and the rails. While train horns and crossing notification systems can also be typical noise sources for ATS trains, the guideway would be completely grade-separated, with no vehicle or passenger walkway along the routes.

The Automated People Mover Standards Committee of the Standards Council of the Transportation and Development Institute of ASCE<sup>29</sup> has developed the Automated People Mover Standards, ANSI/ASCE/T&DI 21-13,<sup>30</sup> which establishes the minimum requirements necessary to achieve an acceptable level of safety and performance for an ATS train. An ATS train is defined as a guided light-rail transit train mode that is fully automated, featuring vehicles that operate on guideways with exclusive ROW. The ASCE Standard covers design, construction, operation, and maintenance of ATS trains. Top ATS train speed of 50 mph is achievable, but the actual operational speed will be limited to a maximum of 45 mph for passenger comfort and will be further governed by the speed restrictions imposed by the City as

26 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition -August 2021. Section 5.4, Fleet Size and Line Capacity Analysis.

27 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition -August 2021.

28 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition -August 2021.

29 Automated People Mover Standards Committee of the Standards Council of the Transportation and Development Institute of ASCE, <https://ascelibrary.org/doi/book/10.1061/asce21>.

30 Automated People Mover Standards Committee of the Standards Council of the Transportation and Development Institute of ASCE, Automated People Mover Standards, ANSI/ASCE/T&DI 21-13. <https://ascelibrary.org/doi/book/10.1061/asce21>.

a condition of operation. Conservatively, this analysis assumes a maximum top speed of 50 miles per hour and travel speeds of 45 miles per hour for the rubber tire ATS trains and monorails.

As required by PDF-Noise-3, the exterior noise level generated by the ATS train, with all contributing noise sources in operation, would not exceed the levels specified in Section 2.2.1, Exterior Airborne Noise, ASCE 21-05.<sup>31</sup> The design of any barrier-type noise reducing devices along the guideway would be subject to the limits noted in **Table 4.10-9: Exterior ATS Train Noise Limits**.

**Table 4.10-9**  
**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, and 50 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 21-05

Potential operational transit noise levels for operation of ATS trains are calculated with the computer noise model SoundPLAN, which generates computer simulations of noise propagation from sources such as rail noise. SoundPLAN creates noise contour maps and forecast noise levels at specific receptors using sound power data and three-dimensional topographical data. Rail noise is modeled according to the industry standard rail noise prediction methodologies adopted by the Federal Railroad Administration (FRA).<sup>32</sup> The FRA noise prediction model calculates an A-weighted noise level at a receiver location through direct propagation or by taking into account shielding provided by barriers.

31 American Society of Civil Engineers, Automated People Mover Standards - Part 2 Section 2.2.1, Exterior Airborne Noise, ASCE 21-05.

32 Federal Railroad Administration, High-Speed Ground Transportation Noise and Vibration Impact Assessment, September 2012.

### Operational Vibration

Ground-borne vibration measurements were collected in accordance with guidance provide in the FTA *Transit Noise and Vibration Impact Assessment Manual*.<sup>33</sup> Under the FTA *Transit Noise and Vibration Impact Assessment Manual*, land use types in determining noise impact criteria are designated into three land use categories:

- **Category 1 (high vibration sensitivity)** includes uses where quiet is an essential element in their intended purpose, such as indoor concert halls or outdoor concert pavilions, or National Historic Landmarks where outdoor interpretation routinely takes place.
- **Category 2 (residential)** includes residences and buildings where people sleep, and
- **Category 3 (institutional)** includes institutional land uses with primarily daytime and evening uses, such as school, places of worship, and libraries.

These categories are developed to determine the level of vibration (VdB) that would disturb people during various activities and at various locations. The basic approach for a General Vibration Assessment is to define a curve, or set of curves, which predicts the overall ground-surface vibration as a function of distance from the source, apply adjustment to those vibration curves to account for site- or system-specific factors such as speed and system design, and estimate the vibration levels for uses located along the transit corridor.

**Figure 4.10-3: Generalized Ground-Surface Vibration Curves** presents the generalized ground-surface vibration curves at representative North American transit systems. These curves assume typical ground-borne vibration levels, equipment in good condition, and speeds of 50 miles per hour (mph) for the rail systems and 30 mph for buses. The top curve applies to trains that are powered by diesel or electric locomotives, which includes intercity passenger trains and commuter rail trains. The curve for rapid transit rail cars covers both heavy- and light-rail vehicles on at-grade and subway tracks. The curve for rubber-tired vehicles is for vehicles that rarely create ground-borne vibration problems unless there is a discontinuity or bump in the road that causes the vibration. Adjustment factors related to speed and distance determine the base curve for assessment of the guideway.

As shown in **Figure 4.10-3**, based on adjustment factors presented in the FTA *Transit Noise and Vibration Impact Assessment Manual*<sup>34</sup> each base curve was reduced by 10 dB to account for the design of the proposed Project to operate on an elevated structure. Speed adjustments were also made, with 0.9 dB being subtracted to the vibration curve (red dotted line) for rapid transit or light rail vehicles to reduce the default speed of 50 mph to 45 mph, and 3.5 dB was added to rubber-tired ATS trains vibration curve (blue dotted line) to increase the default speed of 30 mph to 45 mph.

33 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, FTA Report No. 0123, September 2018, accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf)

34 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

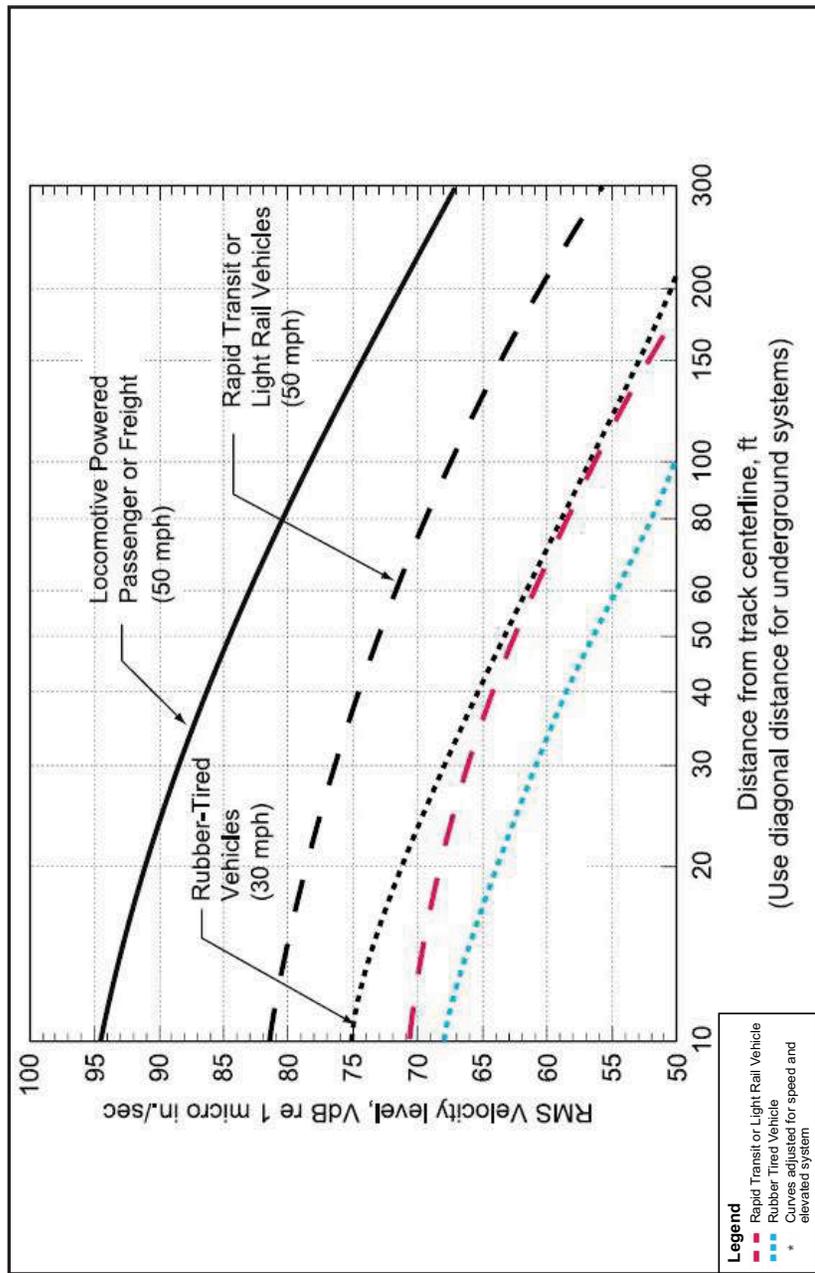


FIGURE 4.10-3  
 SOURCE: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual - September 2018

Generalized Ground-Surface Vibration



4.10.4 REGULATORY FRAMEWORK

Federal, State, and local agencies regulate different aspects of environmental noise. Federal and State agencies generally set noise standards for mobile sources such as aircraft and motor vehicles, while regulation of stationary sources is left to local agencies.

Local regulation of noise involves implementation of general plan policies and noise ordinance standards. Local general plans identify general principles intended to guide and influence development plans; local noise ordinances establish standards and procedures for addressing specific noise sources and activities.

4.10.4.1 Federal Regulations and Directives

Noise Control Act

In 1972, the Noise Control Act<sup>35</sup> was passed by congress to promote limited noise environments in support of public health and welfare. It also established the USEPA Office of Noise Abatement and Control to coordinate federal noise control activities.

USEPA established guidelines for noise levels that would be considered safe for community exposure without the risk of adverse health or welfare effects.

In a 1974 study,<sup>36</sup> USEPA found that to prevent hearing loss over the lifetime of exposure, the yearly average Leq should not exceed 70 dBA. To prevent interference and annoyance, the USEPA found that the DNL should not exceed 55 dBA outdoors or 45 dBA indoors. In 1982, noise control was largely passed to State and local governments.

Office of Safety and Health Administration

With regard to noise exposure and workers, the Office of Safety and Health Administration (OSHA) regulations safeguard the hearing of workers exposed to occupational noise. OSHA is responsible for the protection against the effects of noise exposure when sound levels exceed those, listed in **Table 4.10-10: Permissible Noise Exposures for Workers**, when measured on the A scale of a standard sound level meter at slow response.<sup>37</sup>

<sup>35</sup> Noise Control Act (42 United States Code section 4901 et seq.)  
<sup>36</sup> US Environmental Protection Agency, 1974. Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety. March 1974. p. 34.  
<sup>37</sup> OSHA, "Occupational Noise Exposure," [https://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=STANDARDS&p\\_id=10625](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10625).

### Federal Vehicle Noise Regulations

Federal regulations establish noise limits for medium and heavy trucks (more than 4.8 tons, gross vehicle weight rating) under 40 Code of Federal Regulations (CFR), Part 205, Subpart B.<sup>38</sup> The federal truck pass-by noise standard is 80 dBA at 50 feet (approximately 15 meters) from the vehicle pathway centerline under specified test procedures. These requirements are implemented through regulatory controls on truck manufacturers. There are no comparable federal standards for vibration, which tend to be specific to the roadway surface, the vehicle load, and other factors.

**Table 4.10-10**  
**Permissible Noise Exposures for Workers**

Work Duration per Day (hours)	Sound level (dBA)
8	90
6	92
4	95
3	97
2	100
1.5	102
1	105
0.5	110
0.25 or less	115

Source: Occupational Safety and Health Administration, "Occupational Noise Exposure," [https://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=STANDARDS&p\\_id=10625](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10625).

#### 4.10.4.2 State Regulations and Directives

##### State Noise Standards

The State of California has adopted noise compatibility guidelines for general land use planning as shown in **Figure 4.10-4: State Criteria for Noise Compatible Land Use**. The types of land uses addressed by the State and the acceptable noise categories for each land use are included in the *State of California General Plan Guidelines* guidance document, which is published and updated by the Governor's Office of Planning Research.<sup>39</sup> The level of acceptability of the noise environment is dependent on the activity associated with the particular land use. In addition, Section 65302(f) of the California Government Code requires each county and city in the State to prepare and adopt a comprehensive long-range general plan for its physical

<sup>38</sup> Code of Federal Regulations (CFR), Title 40. Protection of Environment, Environmental Protection Agency, Subchapter G. Noise Abatement Programs, Part 205. Transportation Equipment Noise Emission Controls.

<sup>39</sup> Governor's Office of Planning and Research, State of California General Plan Guidelines (2017), [http://www.opr.ca.gov/docs/OPR\\_COMPLETE\\_7.31.17.pdf](http://www.opr.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf).

development, with Section 65302(g) requiring a noise element to be included in the general plan. The noise element must (1) identify and appraise noise problems in the community, (2) recognize Office of Noise Control guidelines, and (3) analyze and quantify current and projected noise levels.

DHS's Office of Noise Control has established guidelines to provide communities with noise environments that it deems to be generally acceptable based on land-use categories. These guidelines serve as a primary tool for a city to use to assess the compatibility between land uses and outdoor noise. Noise exposure for single-family uses is normally acceptable when the noise level at exterior residential locations is equal to or below 60 dBA (CNEL or Ldn), conditionally acceptable when noise levels are between 55 to 70 dBA (CNEL or Ldn), and normally unacceptable when noise levels exceed 70 dBA (CNEL or Ldn). Some overlap exists between these categories as shown in **Figure 4.10-4**. These guidelines apply to noise sources such as vehicular traffic, aircraft, and rail movements.

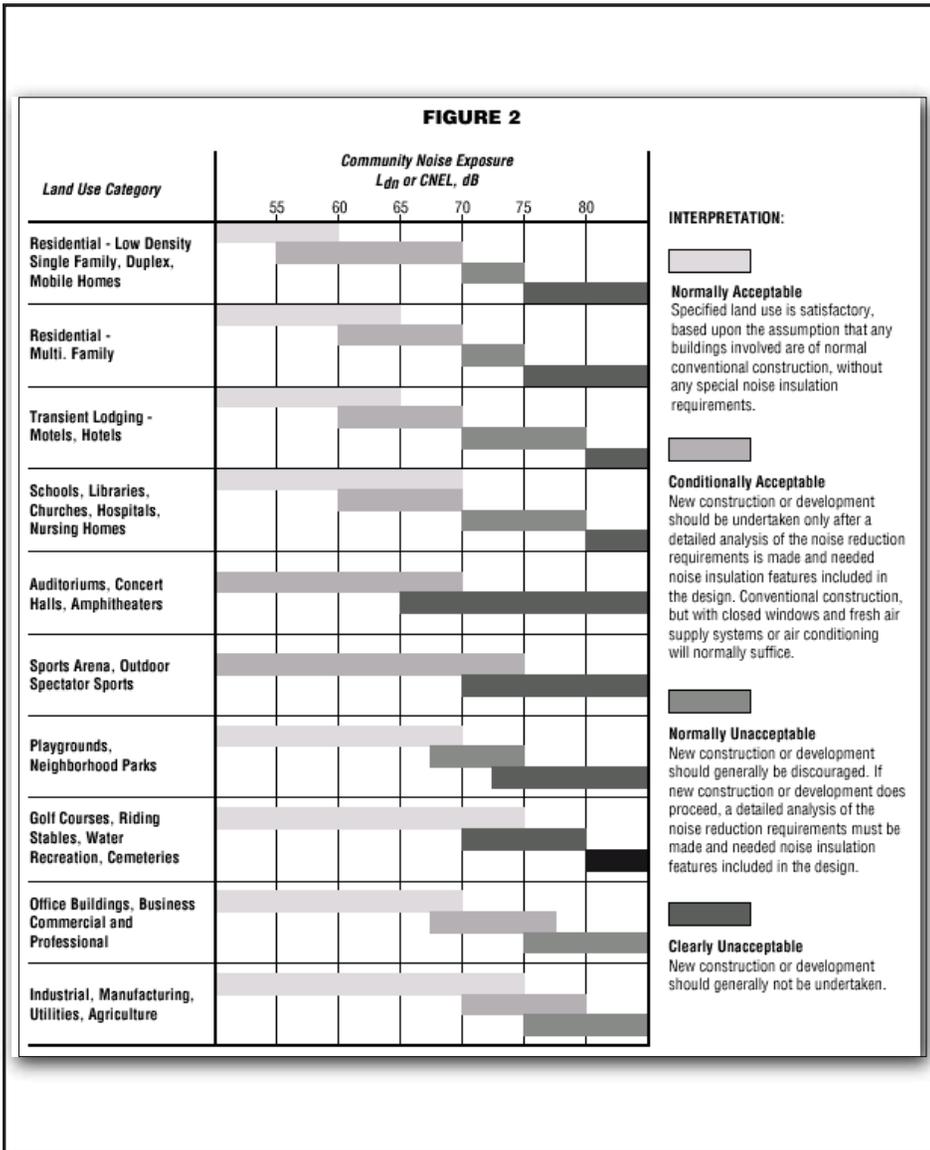
The Department of Housing and Community Development has required that new residential units should not be exposed to outdoor ambient noise levels in excess of 65 dBA (CNEL or Ldn), and, if necessary, sufficient noise insulation must be provided to reduce interior ambient levels to 45 dBA. Within a 65 dBA exterior noise environment, interior noise levels are typically reduced to acceptable levels (to at least 45 dBA CNEL) through conventional construction, but with closed windows and fresh air apply systems or air conditioning.

Because typical noise attenuation within residential structures with closed windows is at least 20 dB, an exterior noise exposure of 65 dB CNEL is generally the noise land-use compatibility guideline for new residential dwellings in California. Because commercial and industrial uses are not occupied on a 24-hour basis, the exterior noise exposure standard for less-sensitive land uses generally is somewhat less stringent.

##### Vehicle Noise Standards

The State of California establishes noise limits for vehicles licensed to operate on public roads.<sup>38F40</sup> For heavy trucks, the State pass-by standard is consistent with the federal limit of 80 dBA. The State pass-by standard for light trucks and passenger cars (less than 4.8 tons, gross vehicle rating) is also 80 dBA at 50 feet (approximately 15 meters) from the centerline. These standards are implemented through controls on vehicle manufacturers and by legal sanction of vehicle operators by State and local law enforcement officials.

40 2009 California Vehicle Code - Section 27200-27207: Article 2.5. Noise Limits



SOURCE: Governor's Office of Planning and Research, Appendix D: Noise Element Guidelines

FIGURE 4.10-4



State Criteria for Noise Compatible Land Use

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4.10.4.3 Regional Regulations and Directives

Los Angeles County Airport Land Use Plan

Pursuant to the California Public Utilities Code,<sup>41</sup> each county in California in which there is an airport served by a scheduled airline and each county with an airport operated for the benefit of the general public, with certain exceptions, is required to establish an airport land use commission (ALUC). Each ALUC must develop a plan for promoting and ensuring compatibility between each airport in the county and surrounding land uses.

In Los Angeles County, the Los Angeles County Regional Planning Commission also acts as the ALUC. ALUC's purpose is to coordinate planning for the area around public airports to protect the public health, safety and welfare from land uses that do not minimize the public's exposure to excessive noise and safety hazards. This is achieved through review of proposed development surrounding airports and through policy and guidance provided in the Los Angeles County Airport Land Use Plan (ALUP).<sup>42</sup>

In formulating the Los Angeles County ALUP, the ALUC establishes provisions to ensure safe airport operations, through the delineation of Runway Protections Zones (RPZs) and height restriction boundaries, and to reduce excessive noise exposure to sensitive uses through noise insulation or land reuse. The extent of the planning boundary designated for the airports in the Los Angeles County ALUP is determined by CNEL noise contours. The Los Angeles County ALUP employs a land use compatibility table to identify the level of compatibility for particular land uses within the planning area boundaries/ AIAs for the County's airports based on community noise exposure level

Per the CFR Part 150 Land Use Compatibility Guidelines,<sup>43</sup> residential uses are identified as noncompatible land uses for parcels exposed to 65 dBA CNEL or higher. Commercial land uses are identified as compatible with 65 and 70 dBA CNEL noise levels. The CFR Part 150 Land Use Compatibility Guidelines categorizes hotel uses as a transient lodging form of residential.

4.10.4.4 Local Regulations and Directives

Inglewood General Plan Noise Element

The General Plan includes a Noise Element<sup>44</sup> which identifies a program for noise control in the planning process and a tool for achieving and maintaining environmental noise levels compatible for land use. The

41 California Public Utilities Code, Division 9, Part 1, Chapter 4, Article 3.5, Sections 21670-21679.5.

42 Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, adopted December 1991, <http://planning.lacounty.gov/view/alup/>

43 Federal Aviation Administration, Land Use Compatibility and Airports. p.V-10.

44 City, General Plan, "Noise Element" (September 1, 1987).

#### 4.10 Noise

Element includes goals and policies to help control noise through land use planning decisions and by developing measures to control non-transportation noise impacts.

As stated in the City's General Plan, the sources of noise in Inglewood can be divided into two basic categories, transportation sources (traffic and aircraft) and non-transportation sources. The most effective method the City has to mitigate transportation noise is through reducing the impact of the noise onto the community (i.e., noise barriers and site design review). Mitigation through the design and construction of a noise barrier (wall berm, or combination wall/berm) is the most common way of alleviating transportation noise impacts.

Noise concerns are incorporated into land use planning to reduce future noise and land use compatibilities. This is achieved by establishing standards and criteria that specify acceptable limits of noise for various land uses throughout the City.

The City has established standards and criteria that specify acceptable limits of noise for various land uses. These criteria are designed to integrate noise considerations into land use planning to prevent noise/land use conflicts. The City's noise standards correlate with land-use zoning classifications to maintain identified ambient noise levels and to limit, mitigate, or eliminate intrusive noise that exceed the ambient noise levels within a specified zone. These guidelines are set forth in the City's Noise Element in terms of the CNEL and include the following:

- Residential uses normally incompatible in areas where the ambient noise levels exceed 70 dB CNEL; and residential uses are clearly and normally compatible in areas where the ambient noise levels range between 55 to 70 dB CNEL.
- Commercial/professional office buildings and land uses are normally incompatible in areas where the ambient noise levels exceed 75 dB CNEL and are normally compatible within areas where the ambient noise levels range from 65 dB CNEL to 75 dB CNEL (for commercial/professional offices only).
- Industrial uses are normally incompatible in areas where the ambient noise levels exceed 75 dB CNEL; and are normally compatible in areas where the ambient noise level ranges between 65 to 75 dB CNEL.
- Institutional land uses are normally incompatible in areas where the ambient noise levels exceed 65 dB CNEL and are normally compatible within areas where the ambient noise levels range from 60 to 65 dB CNEL.
- Hospitals, churches, libraries, and school classrooms are normally incompatible in areas where the ambient noise levels exceeds 65 dB CNEL; and are clearly and normally compatible in areas where the ambient noise level ranges between 50 to 65 dB CNEL.

The following goals from the City General Plan Noise Element are applicable to the proposed Project:

#### 4.10 Noise

**Goal 1:** Provide for the reduction of noise where the noise environment represents a threat to public health and welfare. In those areas where the environment represents a threat to the public health and welfare, it is the objective of the City to reduce environmental hazards to levels consistent with the protection of the public health and welfare.

**Goal 3:** Protect and maintain those areas having acceptable noise environments. In those areas where a quality environment now exists, it is the objective of the City to prevent degradation of that environment.

**Goal 4:** Provide sufficient information concerning the community noise levels so that noise can be objectively considered in land use planning decisions. Noise and land use compatibilities can be avoided for new developments when noise is properly considered in the planning and design of the project. It is the objective of the City to prevent future land use and noise conflicts through the planning process.

#### ***Inglewood Municipal Code (IMC)***

City Municipal Code Chapter 5 (Offenses, Miscellaneous), Article 2 (Noise Regulations) establishes "criteria and standards for the regulation of noise levels within the community." Rather than being adopted to assist the City in guiding land use decisions, like the Noise Element of the General Plan, the City's Noise Regulations are intended to protect "the comfort, repose, health, or peace of residents in the area," and define noise levels that are considered public nuisances and are subject to abatement through the City's exercise of its enforcement authority. Section 5-27 establishes base ambient noise levels within respective times and zones. Where actual noise measurements exceed base ambient noise levels as designated by Section 5-27, the measured noise level shall be employed as the base ambient noise level.

- **Section 5-27: Base Ambient Noise Level:** establishes base ambient noise levels within respective times and zones. Where actual noise measurements exceed base ambient noise levels as designated by Section 5-27, the measured noise level shall be employed as the base ambient noise level.
- **Sections 5-29: Excessive Noise. Unlawful and 5-30: Maximum Residential Noise Levels:** establish the City's authority to regulate noise that "disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person residing in the area," and identifies maximum lawful noise levels and maximum duration periods that may be generated on residential and nonresidential properties.
- **Section 5-31: Maximum Nonresidential Noise Levels:** Measured on the exterior of nonresidential properties, no noise level is permitted to exceed the respective base ambient noise levels for commercial and industrial land uses for a maximum cumulative duration of 30 minutes in any hour.
- **Section 5-39: Machinery, Equipment, Fans and Air-Conditioning, Noise Regulated:** states that it is unlawful for any person to operate, cause to operate or permit the operation of any machinery, equipment, device, pump, fan, compressor, air-conditioning apparatus, or similar mechanical device

in any manner so as to create any noise which would cause the noise level at the property line of any property to exceed the ambient noise base level by 5 dBA.

- **Section 5-41: Construction of Building and Projects, Noise Regulated:** states that is unlawful for any person within a residential zone, or within a radius of 500 hundred feet therefrom, to operate equipment or perform any outside construction or repair work on buildings, structures, or projects or to operate any pile driver, pneumatic hammer, derrick, excavation or earth moving equipment, or other construction equipment between the hours of 8:00 PM and 7:00 AM of the next day in such a manner that a reasonable person residing in the area is caused discomfort or annoyance unless a permit has been obtained from the Permits and Licenses Committee of the City.
- **Section 5-43: Motor Driven Vehicles. Noise Regulated:** prohibits the operation of any motor driven vehicle due to the nature of the operation of the vehicle, condition of the vehicle, or modification made to the vehicle, that would generate noise so that a reasonable person is caused discomfort or annoyance.
- **Section 5-45: Excessive Train Horn Noise Prohibited:** states that it is unlawful for any person to operate or sound, or cause to be operated or sounded, between the hours of 10:00 PM and 7:00 AM of the next day, a train horn or train whistle which creates a noise in excess of 90 dBA at any place or point 300 hundred feet or more distant from the source of such sound.

#### 4.10.5 EXISTING CONDITIONS

##### 4.10.5.1 Adjusted Baseline

The noise analysis assumes the Adjusted Baseline Environmental Setting as described in **Section 4.0**; refer to **Table 4.0-1** for the details of the Adjusted Baseline. Related to noise, the changes associated with the Hollywood Park Specific Plan (HPSP) Adjusted Baseline projects, currently under development and anticipated to be operational prior to construction of the proposed Project, include vehicle trips associated with new uses in the HPSP area. Accordingly, the roadway noise associated with this development within the HPSP area are considered as part of the Adjusted Baseline. No other changes to the existing environmental setting related to noise would occur under the Adjusted Baseline.

##### 4.10.5.2 Summary of Surrounding Land Uses

The proposed Project is located in the central portion of the City, partly within the Downtown TOD Plan area,<sup>45</sup> and extends south along Market Street to Manchester Boulevard, along Manchester Boulevard to

<sup>45</sup> City, New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines, (adopted November 1, 2016), accessed September 2021, [https://www.cityofinglewood.org/DocumentCenter/View/16438/Adopted-DT-and-FV-TOD-Plan\\_low-resolution](https://www.cityofinglewood.org/DocumentCenter/View/16438/Adopted-DT-and-FV-TOD-Plan_low-resolution).

Prairie Avenue, and then south along Prairie Avenue to Hardy Street. The southern portion of the proposed Project is adjacent to the HPSP<sup>46</sup> development site.

The Downtown TOD Plan areas contain a variety of building types and designs and architectural styles. Open spaces within the Downtown TOD Plan area consist of man-made parks, plazas, the Inglewood Cemetery, and landscaped areas that also have an urban and developed character.

Land uses are well balanced in downtown Inglewood with the concentration of commercial retail uses in the historic core. Land uses within Downtown TOD consists of residential uses; retail commercial, and office; and the remainder consists of public services/facilities, industrial, and vacant parcels. The residential neighborhoods in Downtown Inglewood contain a mix of single-family homes, duplexes, or triplexes, along with apartments or townhomes.

The HPSP area is located along Prairie Avenue from Pincay Street to Century Boulevard. The HPSP is an existing and proposed large mixed-use development, including SoFi Stadium, high density residential, retail space, office development, a relocated casino, hotel, four acres of civic uses, and 25 acres of new public parks, including a large lake.

The properties immediately to the west of the HPSP (across Prairie Avenue) are several single-story retail/commercial and multifamily residential uses.

##### 4.10.5.3 Sensitive Receptors

Some land uses are considered more sensitive to intrusive noise than others based on the types of activities typically involved at the receptor location. Land uses considered to be noise sensitive, as identified in the City's General Plan Noise Element<sup>47</sup>, include residences, schools, hospitals, libraries, and parks. Residential land uses are considered especially noise sensitive because (1) considerable time is spent by individuals at home, (2) significant activities occur outdoors, and (3) sleep disturbance is most likely to occur in a residential area. The Federal Highway Administration (FHWA) considers uses where people normally sleep, such as residences, hotels, and motels, noise-sensitive land uses.<sup>48</sup> Commercial and industrial uses are not considered noise-sensitive by either the City or FHWA. However, for purposes of this analysis, adjacent commercial and industrial uses that are considered vibration-sensitive are listed below.

<sup>46</sup> City of Inglewood, Hollywood Park Specific Plan, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015.

<sup>47</sup> City of Inglewood, Inglewood General Plan: Noise Element, September 1987, <https://www.cityofinglewood.org/DocumentCenter/View/130/Noise-Element-1987-PDF>. Accessed September 2021.

<sup>48</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, p. 23, September 2018, accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf)

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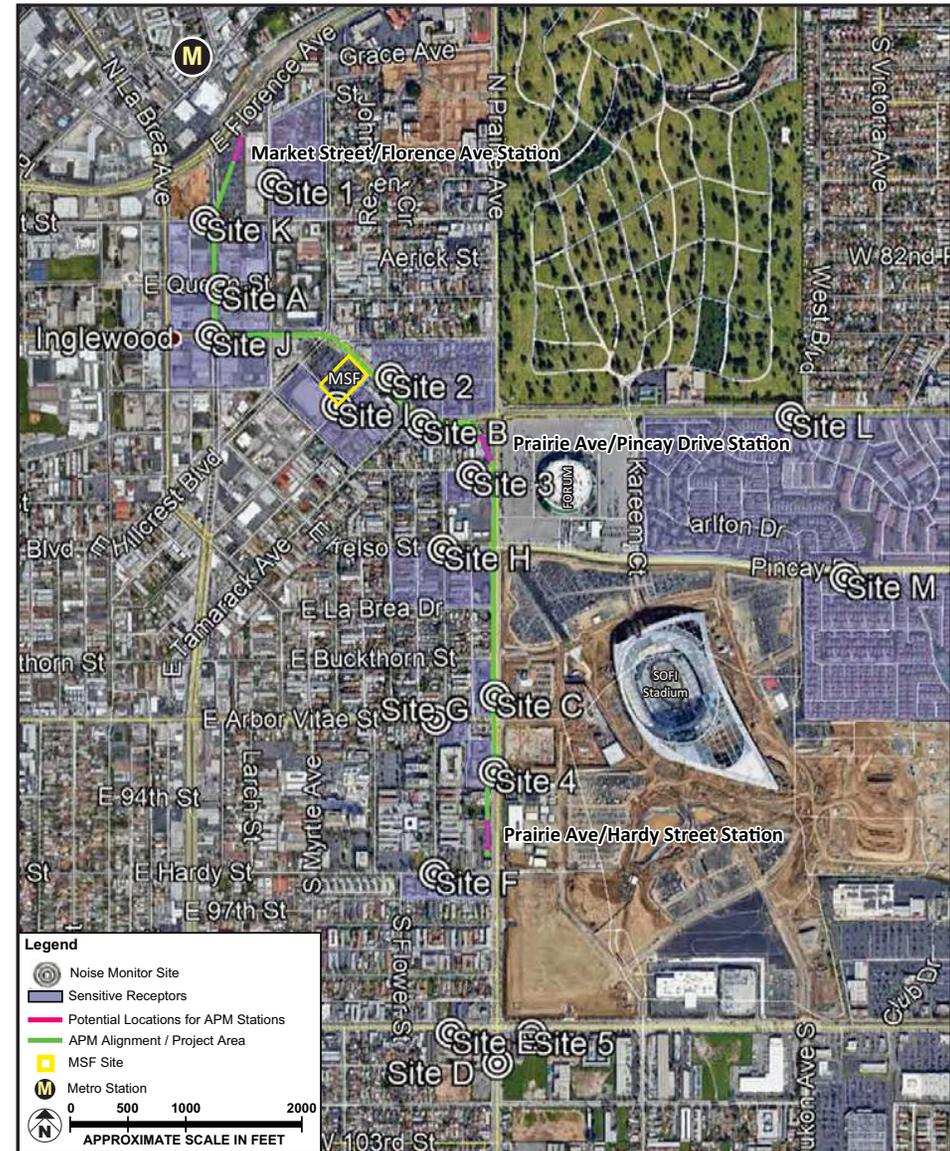
Land uses adjacent to and within a quarter mile radius of the proposed Project consisting of the guideway, stations and the MSF, include noise sensitive receptors where people normally sleep such as hotels and single and multifamily residences (identified as Category 2 uses), schools, places of worship, medical offices (identified as Category 3 uses). For the purpose of presenting the results of the potential noise impact analyses in this Recirculated Draft EIR, the land uses nearest to the proposed Project have been organized into groups by geographic proximity as shown in **Figure 4.10-5: Noise Sensitive Receptor Groups**. These receptor groups are used in this Recirculated Draft EIR to provide a representation of the potential noise impacts on noise-sensitive receptors around the proposed Project and represent the areas where baseline noise monitoring was conducted. Although the receptor groups shown do not include all the receiver points evaluated in the noise modeling analyses, these identified groups include all noise-sensitive receptors nearest to the proposed Project and represent the greatest potential for noise impacts. Adjacent commercial and industrial uses that are not noise-sensitive (specifically, receptor groups Site A – Commercial uses along E. Queen Street, Site D – Commercial uses along Prairie Avenue; lodging uses along W. Century Boulevard, Site E – Commercial and lodging uses along the southern portion of W. Century Boulevard, Site J – Commercial uses along E. Manchester Boulevard, and Site K – Commercial uses along E. Regent Street) but considered vibration-sensitive (as discussed in more detail below), are also listed in the prior locations for informational purposes. As such, the areas where noise and vibration monitoring was conducted along the proposed alignment and stations are comprised of the following uses:

**Market Street Segment**

- **Site 1:** Residential uses on the east side of N. Locust Street including the Holy Faith Episcopal Church, commercial uses on the west side of N. Locust Street;
- **Site A:** Commercial uses along E. Queen Street; and
- **Site K:** Commercial uses along E. Regent Street.

**Manchester Boulevard Segment**

- **Site 2:** Residential uses along E. Manchester Boulevard, Manchester Drive and S. Osage Avenue;
- **Site B:** Residential uses on the northern portion of E. Manchester Boulevard, commercial uses on the southern portion of E. Manchester Boulevard;
- **Site I:** Residential uses on the eastern portion of E. Spruce Avenue, commercial uses on the western portion of E. Spruce Avenue;
- **Site J:** Commercial uses along E. Manchester Boulevard; and
- **Site L:** Residential uses along W. Manchester Boulevard.



SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021

FIGURE 4.10-5



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Noise Sensitive Receptor Groups

### Prairie Avenue Segment

- **Site 3:** Residential uses along E. Nutwood Street, educational facilities along Prairie Avenue;
- **Site 4:** Mixed-use residential along west side of Prairie Avenue;
- **Site H:** Residential uses on the northern and southern portion of E. Kelso Street; educational uses on the corner of Prairie Avenue and Kelso Street;
- **Site G:** Residential uses along E. Arbor Vitae Street;
- **Site M:** Residential uses along Pincay Drive;
- **Site F:** Multifamily residential uses along E. Hardy Street;
- **Site C:** SoFi Stadium to the west of Prairie Avenue, commercial and lodging uses to the east of Prairie Avenue;
- **Site 5:** Lodging uses on the southern portion of W. Century Boulevard;
- **Site D:** Commercial uses along Prairie Avenue; lodging uses along W. Century Boulevard; and
- **Site E:** Commercial and lodging uses along the southern portion of W. Century Boulevard.

#### 4.10.5.4 Noise

##### Ambient Noise

The immediate area surrounding the proposed Project is highly urbanized with multiple noise sources including, but not limited to, traffic on local and arterial streets, aircraft arrivals to and departures from LAX, and commercial and industrial activity (e.g., truck loading/unloading).

To establish baseline noise conditions, long-term 24-hour noise levels (refer to **Appendix N.1-1**) were monitored at five representative receptor locations (identified as Sites 1 to 5) in the vicinity of the proposed guideway and stations, and at the proposed MSF site. Thirteen (13) additional locations (Site A through M) were monitored on two non-successive days, measured as one-hour measurements (refer to **Appendix N.1-1**). The daytime (AM peak) ambient noise levels were measured between 7:00 AM and 10:00 AM, and the evening (PM peak) ambient noise levels were measured between 4:00 PM and 7:00 PM.

**Table 4.10-11: Long-term (24-hour) Ambient Noise Measurements** provides a summary of the ambient noise measurements conducted at the five selected noise receptor locations for a 24-hour period. Based on field observations, the ambient noise at the measurement locations is dominated by local vehicular traffic and, to a lesser extent, airplane flyovers and other typical urban noises. As shown, the existing 24-CNEL at the off-site noise receptor locations ranged from a low of 63.7 dBA CNEL at residential use at Site 1 (Residential uses to the west of N. Locust Street including the Holy Faith Episcopal Church, commercial uses to the east of N. Locust Street) to a high of 80.6 dBA CNEL at the residential uses at Site 4 (Mixed-use

residential along west side of Prairie Avenue). In terms of the City's land use noise compatibility categories, locations range from clearly compatible to clearly incompatible. Specifically, the noise exposure compatibility categories are summarized as follows:

- **Clearly Compatible:** Locations where residential uses are dominant along Locust Avenue (Site 1) and Manchester Boulevard (Site 2) with nighttime averages falling within this category.
- **Normally Compatible:** Locations where residential uses are dominant along Locust Avenue (Site 1) and Manchester Boulevard (Site 2) with daytime averages and 24-hour CNEL falling within this category. Additionally, nighttime averages of the residential uses along Nutwood Street (Site 3) and lodging uses along Century Boulevard (Site 5) fall within this category.
- **Normally Incompatible:** Locations where residential uses are dominant along Nutwood Street (Site 3) and lodging uses along Century Boulevard (Site 5) with daytime averages and 24-hour CNEL falling within this category. Additionally, locations where commercial uses are dominant along Prairie Avenue (Site 4) with daytime and nighttime averages falling with this category.
- **Clearly Incompatible:** Locations where commercial uses are dominant along Prairie Avenue (Site 4) with 24-hour CNEL averages falling within this category.

**Table 4.10-12: Short-term (1-hour) Ambient Noise Measurements (Daytime)** provides the one-hour measurements during the AM and PM peak hours at the 13 selected noise receptor locations (refer to **Appendix N.1-2**). As shown, the existing 1-hour ambient noise levels (dBA Leq) at the off-site noise receptor locations ranged from a low of 62.7 dBA Leq at the residential uses at Site F (Multifamily residential uses along E. Hardy Street) during the AM period to a high of 76.6 dBA Leq at the residential uses at Site M (Residential uses along Pincay Drive) during the PM period. In terms of the City's land use noise compatibility categories, locations range from clearly compatible to clearly incompatible. Specifically, the noise exposure compatibility categories are summarized as follows:

- **Clearly Compatible:** Locations where public uses are dominant along Market Street (Site K).
- **Normally Compatible:** Locations where residential uses are dominant along Queen Street (Site K), Manchester Boulevard (Site I), Arbor Vitae Street (Site G), Kelso Street (Site H) and Hardy Street (Site F).
- **Normally Incompatible:** Land uses where commercial uses are dominant along Market Street (Site J), where residential uses are dominant along Manchester Boulevard (Site L), where lodging uses are dominant along Prairie Avenue (Site D) and Century Boulevard (Site E), and where education uses are dominant along Manchester Boulevard (Site B) and Kelso Street (Site H).
- **Clearly Incompatible:** Land uses where places of worship are dominant on Prairie Avenue (Site C).

**Table 4.10-13: Short-term (15-minute) Ambient Noise Measurements (Nighttime)** provides the 15-minute measurements during the nighttime period after 8:00 PM at the 13 selected noise receptor locations (refer to **Appendix N.1-3**). As shown, the existing short-term 15-minute noise levels during the

4.10 Noise

nighttime ranged from a low of 56.6 dBA Leq at Site H (Residential uses on the northern and southern portion of E. Kelso Street; educational uses on the corner of Prairie Avenue and Kelso Street) to a high of 72.8 dBA Leq at Site L (Residential uses along W. Manchester Boulevard). In terms of the City's land use noise compatibility categories, locations range from clearly compatible to clearly incompatible. Specifically, the noise exposure compatibility categories are summarized as follows:

- **Clearly Compatible:** Land uses where residential uses are dominant along Queen Street (Site A), Manchester Boulevard (Site I), Kelso Street (Site H), and Hardy Street (Site F). Additionally, where commercial uses are dominant along Market Street (Site J and K).
- **Normally Compatible:** Land uses where residential uses are dominant along Arbor Vitae Street (Site G), Chapman Lane (Site M). Additionally, where lodging uses are dominant along Prairie Avenue (Site D) and Century Boulevard (Site E).
- **Normally Incompatible:** Land uses where residential uses are dominant along Manchester Boulevard (Site L). Additionally, where educational uses are dominant along Manchester Boulevard (Site B) and where place of worship uses are dominant along Prairie Avenue (Site C).
- **Clearly Incompatible:** None.

**Roadway Noise**

Adjusted baseline conditions include socio-economic and demographic components, and transportation network components that are currently under construction or have building permits issued by the City in the immediate vicinity of the ITC Project alignment. Accordingly, as explained in Transportation Study (refer to **Appendix O**) the travel demand forecasting model used in the process was updated as required to reflect these assumptions.

The adjusted baseline traffic noise on local roadways in the surrounding areas was calculated to quantify the daytime and nighttime noise levels using information provided by the Transportation Study (see **Appendix O**). As previously noted, a total of 26 intersections and corresponding roadway segments were selected for the existing off-site traffic noise analysis, based on proximity to noise sensitive uses along the roadway segments and potential increases in traffic volume from the proposed Project.

Trip generation associated with the buildout and operation of the Adjusted Baseline projects (see **Section 4.0, 4.0.5: Adjusted Baseline**) has been estimated and traffic volumes in the area surrounding the proposed Project have been projected to establish the Adjusted Baseline traffic environment along the roadway segments selected for analysis. Additionally, trip generation associated with events at the SoFi Stadium, The Forum, and concurrent events at both venues has been estimated and traffic volumes projected to establish the combined traffic environment during which one or more events are being held.

4.10 Noise

**Table 4.10-11  
Long-term (24-hour) Ambient Noise Measurements**

Site	Address	Existing Land Use	Monitored Date	CNEL (dBA)	Daytime Average (dBA Leq) <sup>1</sup>	Nighttime Average (dBA Leq) <sup>2</sup>	Noise Exposure Compatibility Category
<b>Market Street Segment</b>							
1	220 Locust Avenue	Residential	November 14, 2018 November 15, 2018	63.7 65.7	61.9 65.6	54.6 55.1	Clearly/Normally Compatible Clearly/Normally Compatible
<b>Manchester Boulevard Segment</b>							
2	607 Manchester Boulevard	Residential	November 14, 2018 November 15, 2018	67.7 67.5	65.0 64.1	59.4 59.6	Clearly/Normally Compatible Clearly/Normally Compatible
<b>Prairie Avenue Segment</b>							
3	818 Nutwood Street	Residential	November 14, 2018 November 15, 2018	74.1 75.2	71.2 71.5	66.0 67.5	Normally Compatible/Normally Incompatible Normally Compatible/Clearly Incompatible
4	923 Prairie Avenue	Commercial	November 14, 2018 November 15, 2018	80.1 80.6	78.0 77.2	71.6 72.8	Normally Incompatible/Clearly Incompatible Normally Compatible/Normally Incompatible
5	3940 Century Boulevard	Lodging	November 14, 2018 November 15, 2018	77.6 77.6	73.3 73.7	70.2 70.0	Normally Compatible/Normally Incompatible Normally Compatible/Normally Incompatible

Source: Refer to **Appendix N.1.1: Long-Term (24-hour) Ambient Noise Measurement Sheets** for monitoring data sheets.

Note:

<sup>1</sup> Daytime period (Day) includes 7:00 AM to 10:00 PM.

<sup>2</sup> Nighttime period (Night) includes 10:00 PM to 7:00 AM.

**Table 4.10-12**  
**Short-term (1-hour) Ambient Noise Measurements (Daytime)**

Site	Approximate Address	Existing Land Use	Monitored Date	1-hour Leq (dBA)		Noise Exposure Compatibility Category
				AM Peak Hour	PM Peak Hour	
<b>Market Street Segment</b>						
J	201 Market Street	Commercial/Mixed Use	December 17, 2018 December 19, 2018	73.3 73.8	73.2 73.9	Normally Incompatible 73.6
K	205 Market Street	Public	November 26, 2018 November 28, 2019	67.1 69.1	68.0 64.6	Clearly/Normally Compatible 67.5
A	300 Queen Street	Residential	November 26, 2018 November 28, 2018	64.2 63.5	64.1 64.6	Normally Compatible 64.1
<b>Manchester Boulevard Segment</b>						
L	3500 Manchester Boulevard	Residential	December 17, 2018 December 19, 2018	73.9 74.5	74.2 73.4	Normally Incompatible 74.0
I	500 Manchester Boulevard	Residential	December 11, 2018 December 13, 2018	69.5 67.6	66.6 67.8	Normally Compatible 68.0
B	712 Manchester Boulevard	Educational	December 11, 2018 December 13, 2018	72.1 76.1	71.2 72.9	Normally Incompatible 73.5
<b>Prairie Avenue Segment</b>						
G	629 Arbor Vitae Street	Residential	December 11, 2018 December 13, 2018	64.3 68.0	67.0 68.8	Normally Compatible 67.3
H	728 Keiso Street	Educational/Residential	December 17, 2018 December 19, 2018	68.1 65.4	69.1	Normally Compatible/Normally Incompatible 67.6
M	3681 Chapman Lane	Residential	December 17, 2018 December 19, 2018	72.8 73.2	75.9 76.6	Normally Incompatible 74.9
F	636 Hardy Street	Residential	January 21, 2019 January 23, 2019	62.7 71.5	63.8 70.9	Normally Compatible 68.8

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Site	Approximate Address	Existing Land Use	Monitored Date	1-hour Leq (dBA)		Noise Exposure Compatibility Category
				AM Peak Hour	PM Peak Hour	
C	823 Prairie Avenue	Place of Worship/Lodging	December 11, 2018 December 13, 2018	77.3 77.1	76.1 76.2	Normally/Clearly Incompatible 76.7
D	10023 Prairie Avenue	Lodging	November 27, 2018 December 4, 2018	75.1 74.4	78.5 75.4	Normally Incompatible 76.2
E	4020 Century Boulevard	Lodging	November 27, 2018 December 4, 2018	72.8 73.1	71.7 72.7	Normally Incompatible 72.6

Source: Refer to Appendix N.1-2: Short-term (1-hour) Ambient Noise Measurement (Daytime) for monitoring data sheets.

Note: Two sets of measurements were taken on non-successive days for each site. AM Peak hour measurements taking place between 7:00 AM to 10:00 AM. PM peak hour measurements took place between 4:00 PM to 7:00 PM.

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Table 4.10-13  
Short-term (15 minute) Ambient Noise Measurements (Nighttime)

Site	Approximate Address	Existing Land Use	Monitored Date	15-minute dBA	Noise Exposure Compatibility Category
<b>Market Street Segment</b>					
J	201 Market Street	Commercial/Mixed Use	August 3, 2020	69.1	Clearly Compatible
K	205 Market Street	Public	August 3, 2020	63.4	Clearly Compatible
A	300 Queen Street	Residential	August 3, 2020	57.8	Clearly Compatible
<b>Manchester Boulevard Segment</b>					
L	3500 Manchester Boulevard	Residential	August 4, 2020	72.8	Normally Incompatible
I	500 Manchester Boulevard	Residential	August 3, 2020	58.5	Clearly Compatible
B	712 Manchester Boulevard	Educational	August 4, 2020	70.5	Normally Incompatible
<b>Prairie Avenue Segment</b>					
G	629 Arbor Vitae Street	Residential	August 5, 2020	61.5	Normally Compatible
H	728 Kelso Street	Educational/Residential	August 4, 2020	56.6	Clearly Compatible
M	3681 Chapman Lane	Residential	August 4, 2020	67.9	Normally Compatible
F	636 Hardy Street	Residential	August 5, 2020	59.9	Clearly Compatible
C	823 Prairie Avenue	Place of Worship/Lodging	August 5, 2020	70.6	Normally Incompatible
D	10023 Prairie Avenue	Lodging	August 5, 2020	67.0	Normally Compatible
E	4020 Century Boulevard	Lodging	August 5, 2020	66.2	Normally Compatible

Source: Refer to Appendix N.1-3: Short-term (15-minute) Ambient Noise Measurements (Nighttime) for monitoring data sheets.  
Note: Nighttime measurements took place between 8:00 PM to 9:45 PM.

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Appendix N.2-1 provides the roadway noise levels for the adjusted baseline traffic levels in details. As shown, adjusted baseline roadway noise levels during the daytime ranged from a low of 55.8 dBA along Market Street from Florence Avenue to Regent Street to a high of 72.5 dBA along Century Boulevard between Grevillea Avenue and La Brea Avenue/Hawthorne Boulevard. Additionally, nighttime roadway noise levels ranged from a low of 48.2 along Market Street from Florence Avenue to Regent Street to a high of 64.3 dBA along Century Boulevard from Club Drive to Crenshaw Boulevard.

### Aircraft Noise

The nearest public use airport to the proposed Project is LAX. There are no private airstrips located in the vicinity of the proposed Project.

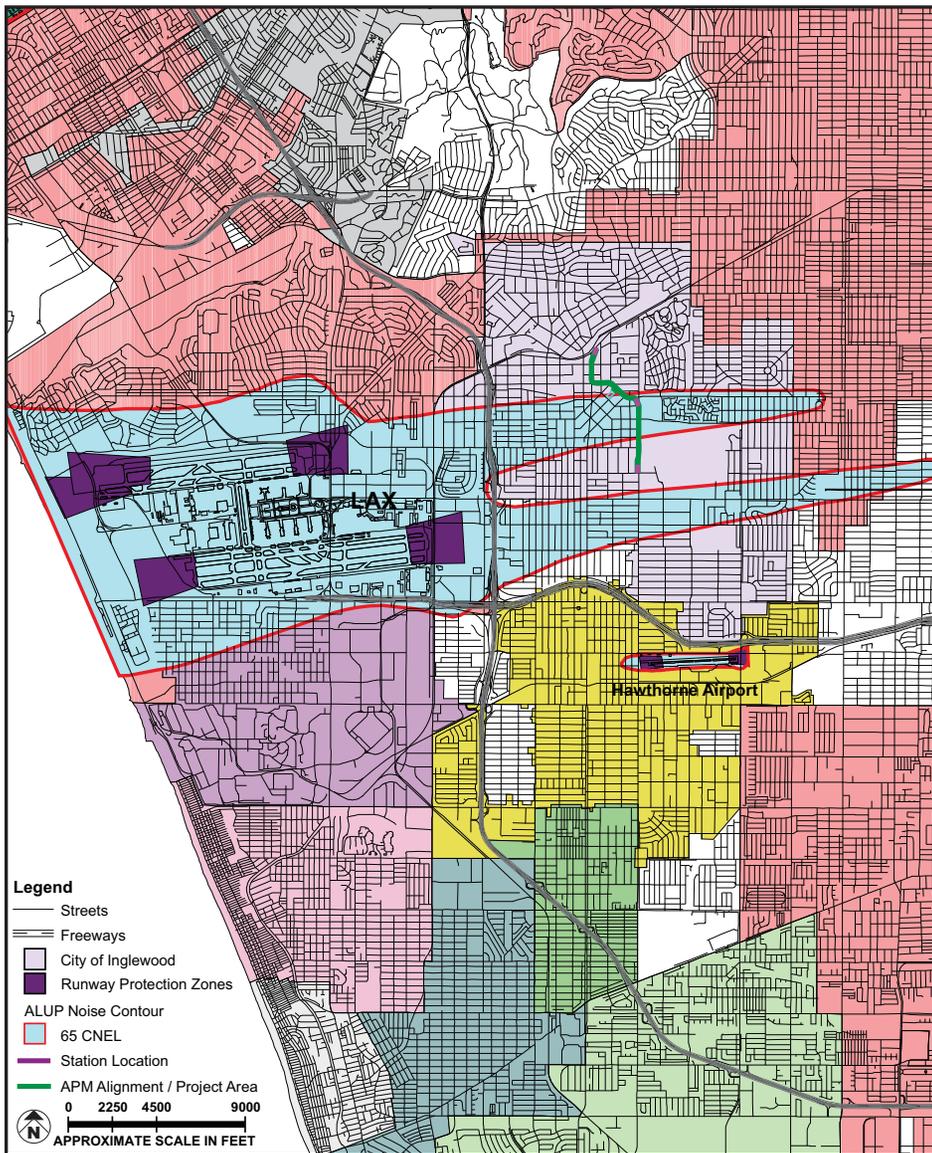
The Planning Boundary for LAX represents the combined areas around the airport subject to potential noise impacts and safety hazards associated with airport operations. The ALUP<sup>49</sup> provides noise and safety policies governing development of compatible future land uses in areas around LAX. Portions of the alignment between south Market Street, along Manchester Boulevard and south Prairie Avenue are located within the Planning Boundary/Airport Influence Area established for LAX in the Los Angeles County ALUP Map for LAX as shown in Figure 4.10-6: ALUP Noise Contours. Portions of the proposed Project between south Market Street, along Manchester Boulevard and south Prairie Street are located within the CNEL 65 dBA contour established for LAX in the ALUP (see Figure 4.10-4).

### Groundborne Noise

Groundborne noise levels in residential areas similar to the Project area would generally be 20 to 50 decibels lower than the velocity level depending on the frequency level of the source.<sup>50</sup> With a background groundborne vibration level in residential areas of 50 VdB or lower, groundborne noise levels would be approximately 0 to 30 dBA. A bus traveling at a distance of 50 feet would generate groundborne noise levels of approximately 23 to 38 dBA.

<sup>49</sup> Los Angeles County Airport Land Use Plan, 1991, Contour Map, <http://planning.lacounty.gov/view/alup/>

<sup>50</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, p. 146, September 2018, accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf)



SOURCE: Los Angeles County Airport Land Use Commission. Airport Influence Area  
[https://planning.lacounty.gov/assets/upl/project/aluc\\_airport-lax.pdf](https://planning.lacounty.gov/assets/upl/project/aluc_airport-lax.pdf)

FIGURE 4.10-6

ALUP Noise Contours



251-003-20

4.10.5.5 Vibration

**Groundborne Vibration**

The groundborne vibration level in residential areas is usually 50 VdB or lower, well below the threshold of perception for humans, which is around 65 VdB.<sup>51</sup> Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people or slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is rarely perceptible. Although not sources of groundborne vibration, noise-induced building responses such as rattling of windows and walls from aircraft flyovers contribute to the existing vibration setting. The primary sources of existing groundborne vibration in the area surrounding the Project area would be from adjacent industrial activities, including truck travel, heavy-duty vehicular travel (bus, refuse trucks, delivery trucks, etc.) on local roadways, and aircraft flyovers. A bus traveling at a distance of 50 feet typically generates groundborne vibration velocity of 63 VdB (approximately 0.006 in/sec PPV).<sup>52</sup> Aircraft flyovers could generate vibration levels that would cause human annoyance; however, they would not generate building vibration levels that would cause building damage.<sup>53</sup>

**Ambient Vibration**

An ambient vibration monitoring survey was undertaken to establish existing ground-borne vibration levels at various locations near the proposed Project. Existing vibration monitoring was conducted to provide data on ambient ground-borne vibration generated by traffic and operation of activities. The locations of the vibration monitoring selected were either adjacent to sensitive land uses (residences and hotels) or buildings that were close to where the components of the proposed Project would be constructed. Five ground vibration monitoring locations were established, as shown on Figure 4.10-5.

**Table 4.10-14: 24-hour Vibration Measurements in Project Vicinity** shows vibration velocities attributed to road traffic and normal operations of establishments in the area. The vibration velocity is expressed in vibration decibels (VdB) and is the maximum RMS value measured on the frequency range between 8 and 80 Hz. As shown, the average vibration velocities ranged from a low of 52 VdB at Site 1 at 220 Locust Avenue to a high of 67 VdB at Site 5 at 3940 Century Boulevard. It is important to note, Site 5 is located outside of the guideway of the proposed Project. The maximum vibration velocities within the proposed

51 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, p. 113, September 2018, accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf)  
 52 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, p. 113, September 2018, accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf)  
 53 National Aeronautics and Space Administration, Building Vibrations Induced by Noise from Rotorcraft and Propeller Aircraft Flyovers, p. 10, June 1992.

Project is 62 VdB at Site 4 at 923 Prairie Avenue. These vibration velocities are considered to be below the approximate threshold of perception for many humans of 72 VdB as established by the FTA.<sup>54</sup>

**Table 4.10-14**  
**24-hour Vibration Measurements in Project Vicinity**

Site	Address	Existing Land Use	24-HR VdB
<b>Market Street Segment</b>			
1	220 Locust Avenue	Residential Development	52
<b>Manchester Boulevard Segment</b>			
2	607 Manchester Boulevard	Residential Development	60
<b>Prairie Avenue Segment</b>			
3	818 Nutwood Street	Educational/Residential Development	60
4	923 Prairie Avenue	Residential Development	62
5	3940 Century Boulevard	Lodging	67

Source: Refer to **Appendix N.3** for Vibration monitoring data sheets.  
Note: Vibration measurements were conducted on November 16, 2018.

#### 4.10.6 THRESHOLDS OF SIGNIFICANCE

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of potential noise and vibration impacts. The proposed Project would have a significant impact in relation to noise and vibration if it were to result in:

**Threshold NOI-1:** Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

**Threshold NOI-2:** Generation of excessive groundborne vibration or groundborne noise levels.

##### 4.10.6.1 Construction Noise

The City's General Plan and Municipal Code do not establish numeric maximum acceptable source noise levels or noise level increases at potentially affected receivers. Section 5-41 of the City's Municipal Code<sup>55</sup> regulates construction noise and specifies restrictions for work occurring within a residential zone or within a radius of 500 feet between the hours of 8:00 PM and 7:00 AM. Pursuant to Section 5-41, it is unlawful for any person within a residential zone, or within a radius of 500 hundred feet therefrom, to

<sup>54</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment, FTA report no. 0123 (September 2018), accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf).

<sup>55</sup> City of Inglewood, Municipal Code, Article 2, Noise Regulations. Section 5-41, Construction of Building and Projects, Noise Regulated 41http://www.qcode.us/codes/inglewood/?view=desktop&topic=5-2

operate equipment or perform any outside construction or repair work on buildings, structures, or projects or to operate any pile driver, pneumatic hammer, derrick, excavation or earth moving equipment, or other construction equipment between the hours of 8:00 PM and 7:00 AM of the next day in such a manner that a reasonable person residing in the area is caused discomfort or annoyance unless a permit has been obtained from the Permits and Licenses Committee of the City. The prohibition of nighttime construction in or near residential zones, without first obtaining a permit authorizing such nighttime construction (8:00 PM to 7:00 AM), reflects that the City does not regulate construction noise during daytime hours (7:00 AM to 8:00 PM).

The FTA *Transit Noise and Vibration Impact Assessment Manual*<sup>56</sup> provides a general noise assessment guideline to assess potential noise impacts construction of transit projects. A general noise assessment is suitable and appropriate given the current stage of planning and evaluation for this Project. The FTA's General Assessment Construction Noise Criteria identifies daytime and nighttime thresholds for residential, commercial, and industrial land uses, which are considered reasonable criteria for use in assessing the potential for adverse community reaction to noise generated by construction activities.

The construction noise criteria threshold for residential uses is 90 dBA (Leq-1hour) during the daytime and 80 dBA (Leq-1hour) during the nighttime period. Additionally, construction noise thresholds for commercial and industrial uses are 100 dBA (Leq-1hour) during both the daytime and nighttime periods. Since the construction-related noise level threshold represents the energy average of the noise source over a given time, they are expressed as Leq noise levels. With regard to increases in A-weighted noise levels, a 10 dBA change is subjectively heard as approximately doubling in loudness and can cause adverse response.<sup>57</sup> As such, in addition to the FTA General Assessment Construction Noise Criteria for residential, commercial, and industrial uses, an increase of 10 dBA or more above ambient noise levels is considered significant.

The use of these thresholds in this Recirculated Draft EIR responds to the unique circumstances of the proposed Project and its alignment along the fixed guideway corridor. By utilizing these quantitative thresholds in this Recirculated Draft EIR, the City is not making a decision whether to use these thresholds in CEQA documents on other proposed projects in the future. The City would, however, retain its authority as CEQA lead agency to utilize these or other thresholds, including relying exclusively on the provisions of Municipal Code Section 5-41 for the consideration of construction noise, as appropriate to the circumstances of other projects in the future.

<sup>56</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018, accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf)

<sup>57</sup> California Department of Transportation, *Technical Noise Supplement*, September 2013, accessed September 2021, <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf>

#### 4.10.6.2 Operational Noise

As discussed previously, the City has established criteria that specify acceptable limits of noise for various land uses. These criteria are designed to integrate noise considerations into land use planning to prevent noise/land use conflicts.

For operational impacts, the City recognizes that such impacts occur on the long-term, and, as a result, the City has determined that in this case the significance threshold should be more conservative, specifically in areas where sensitive receptors are already exposed to above acceptable levels. As such, an increase in noise level of 3 dBA Leq to or within the “normally unacceptable” or “clearly unacceptable” land use compatibility categories is considered significant. For residential – low density single-family, duplex, mobile home and multifamily uses and schools, libraries, churches, hospitals, and nursing homes – the upper limit for Conditionally Acceptable noise exposures is 70 dBA DNL or CNEL. For office buildings, business commercial and professional uses the upper limit for Conditionally Acceptable noise exposures is 75 dBA DNL or CNEL.

As described previously, the City has adopted Noise Regulations<sup>58</sup> that prohibit noise in excess of specified levels, depending on base ambient noise levels, the nature of the use where noise levels are measured, and the duration period of such noise. The Noise Regulations may prohibit any increase in ambient noise levels under specified circumstances. The City has not previously relied on the Noise Regulations to serve as significance thresholds for operational noise. The City has determined that the Noise Regulations should not serve as operational noise thresholds for the proposed Project. The reason for this determination is that an increase in ambient noise would be imperceptible, or at most barely perceptible, where that increase is less than 3 dBA. Such an increase in ambient noise levels would not have a significant effect on the physical environment. The City has instead determined that the threshold should be set at a level that is actually perceivable. Additionally, the more a new source of noise exceeds the ambient noise level, the less acceptable the new noise will be judged by those hearing it. As explained previously, a 10 dBA change is subjectively heard as approximately a doubling in loudness that can result in an adverse community response. As such, in the event the resulting noise levels remain within acceptable noise limits, an increase of 10 dBA or more is considered significant.

In the cumulative context, the proposed Project’s noise and vibration impacts are considered in conjunction with other reasonably foreseeable development, using the same thresholds set forth above.

#### 4.10.6.3 Groundborne Noise

Ground-borne noise occurs when vibration radiates through a building interior and creates a low-frequency sound, often described as a rumble, as a train passes by. Groundborne noise that accompanies

<sup>58</sup> City, Municipal Code, Article 2, Noise Regulations. <http://www.qcode.us/codes/inglewood/?view=desktop&topic=5-2>.

the building vibration is usually perceptible only inside buildings and typically is only an issue at locations with subway or tunnel operations where there is no airborne noise path or for buildings with substantial sound insulation such as a recording studio. The proposed Project does not include subway or tunnel operations and there are no substantially insulated indoor receptors located within the area surrounding the proposed guideway vicinity. For typical buildings with at-grade or elevated transit operations, the interior airborne noise levels are often higher than the ground-borne noise levels. As an example, groundborne noise generated by a large bulldozer within five feet of a receptor building would reach an approximate level of 58 dBA, which is not greater than the airborne noise levels generated by construction equipment discussed below. As such, impacts related to groundborne noise are not discussed further.

#### 4.10.6.4 Groundborne Vibration

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Buildings founded on the soil near the construction site respond to these vibrations with varying results, ranging from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibrations at moderate levels, and slight damage at the highest levels.

There are no adopted City standards or thresholds of significance for vibration. The evaluation of potential building damage impacts related to construction vibration levels is based on the published data in the FTA guidance.<sup>59</sup> While ground vibrations from construction activities do not often reach the levels that can damage structures, fragile buildings must receive special consideration. As such, the vibration damage criteria adopted by the FTA and applied in this analysis are listed below. Vibration impacts could be potentially significant if the vibration velocity exceeds the following:

- Reinforced-concrete, steel, or timber (no plaster) would exceed 0.5 PPV (inches per second);<sup>60</sup>
- Engineered concrete and masonry (no plaster) would exceed 0.3 PPV;
- Nonengineered timber and masonry buildings would exceed 0.2 PPV;
- Buildings extremely susceptible to vibration damage would exceed 0.12 PPV.

The PPV is defined as the maximum instantaneous positive or negative peak of the vibration and is often used in monitoring of vibration because it is related to the stresses experienced by structures. The FTA has also adopted standards associated with human annoyance for groundborne vibration impacts for the

<sup>59</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, FTA report no. 0123 (September 2018), accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf).

<sup>60</sup> When assessing vibration source levels from construction equipment, vibration is generally assessed in terms of PPV. PPV is defined as the peak signal value of an oscillating vibration velocity waveform, expressed in inches per second.

following three-land use categories: (1) Category 1, High Sensitivity; (2) Category 2, Residential; and (3) Category 3, Institutional.

- **Category 1** refers to buildings where vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment includes, but is not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes.
- **Category 2** refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals.
- **Category 3** refers to institutional land uses such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment, but still have the potential for activity interference.

For purposes of this analysis, the human annoyance threshold is 72 VdB for residences and buildings where people normally sleep and 75 VdB for commercial uses, industrial uses, and churches with primarily daytime use.

It is important to note, it is extremely rare for vibration from train operations to cause substantial or even minor cosmetic building damage. However, damage to fragile historic buildings located near the ROW may be of concern. Even in these cases, damage is unlikely except when the track is located very close to the structure.

#### 4.10.8 IMPACT ANALYSIS

As discussed in **Section 3.0**, the proposed project includes a Construction Commitment Program (CCP) to proactively address the potential effects of the Project on the community during construction. The CCP, which includes PDF Noise-1 and PDF Noise-2 described below, addresses various effects including noise and vibration that would occur during construction.

##### 4.10.8.1 Project Design Features

As part of the CCP, the City will designate a Community Affairs Liaison to be responsible for responding within 24 hours to any local complaint or question about construction activities. A website will be established with project construction information and contact information for the Community Affairs Liaison. A toll-free phone line (available 24 hours a day) and website will be made a part of all construction notices and shall be posted in prominent public facing locations around the Project area and in adjacent public spaces.

The Community Affairs Liaison shall receive all public complaints, investigate the cause of the complaint and develop/implement feasible measures to address and resolve the cause of the complaint.

#### PDF-NOISE-1 Construction Noise Control Plan (CCP)

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.

#### 4.10 Noise

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.

#### PDF NOISE-2 Construction Vibration Reduction Plan (CCP)

Prior to the issuance of any demolition or construction permit for each phase of the 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 to ensure impacts from ground borne vibration are less than significant:

- 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 project activities.
  - Crack gauges shall be installed on multiple representative cracks, particularly on sides of the building facing the Project.

#### 4.10 Noise

- 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 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 post-construction 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 Project and/or show how the 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 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 (1) 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.

#### PDF NOISE-3 Operational (CCP)

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 in **Table 4.10-9** above.

**Impact NOI-1: Would the project result in a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

#### Construction

##### *Proposed Project Construction Activities*

As previously described, construction activity would primarily occur over a 16-hour per day schedule with two shifts, either a Morning/Evening shift from approximately 7:00 AM to 3:00 PM and an evening shift from approx. 3:00 PM to 11:00 PM, or a Morning/Night shift from approximately 7:00 AM to 3:00 PM and a night shift from approximately 11:00 PM to 7:00 AM.<sup>61</sup> There will also be periods when construction activities are scheduled to occur from approximately 11:00 PM to 7:00 AM to accommodate work activities that cannot be accomplished during the daytime shifts (i.e., during large-scale pours of concrete when it would be necessary to maintain a continuous stream of concrete deliveries through multiple shifts). Construction work is assumed to occur seven days a week.

Construction noise impacts due to construction activities were determined by comparing the calculated construction-related noise levels of the proposed Project to the measured existing ambient noise levels (i.e., noise levels without construction noise from the proposed Project). Construction noise levels were calculated for each phase of construction (Phases 1 through 8) at the adjacent land uses.

#### Phase 1

As described previously, Phase 1 includes demolition of buildings and site improvements on properties acquired for construction, 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. Prior to Phase 1 construction activities being initiated on the MSF, 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. These construction activities would be limited to the northern portion of the MSF site along Manchester Boulevard and Hillcrest Boulevard and would be located approximately 465 feet to the west of the existing residential

<sup>61</sup> Appendix 3.0.4: Construction Phasing Narrative in this Recirculated Draft EIR, August 2021.

uses along Spruce Avenue. Currently, the Vons building is located approximately 30 feet to the west of the existing residential uses along Spruce Avenue and would act as a barrier during construction of the new building that is located further away from these sensitive uses. Demolition of the current Vons building won't occur until after the new Vons building has been constructed. Additionally, construction would be conducted in accordance with all standards and requirements applicable to construction in the Inglewood Municipal Code. For these reasons, these construction activities will not result in significant noise impacts.

**Table 4.10-15: Phase 1 Proposed Project Construction Noise Levels** presents the forecasted demolition and construction noise levels for Phase 1 of the ITC construction that would be generated by construction equipment at nearby adjacent sensitive receptors. As shown, construction noise levels during the daytime period would range from a low of 55.0 dBA (Leq1-hour) at the residential areas along Pincay Drive to the east of the Prairie Avenue/Manchester Boulevard Station (Site M) to a high of 77.6 dBA (Leq1-hour) at the residential uses along Locust Street to the east of the Market Street/Florence Avenue Station (Site 1) and the residential uses along Spruce Avenue to the east of the MSF (Site I). Additionally, construction noise levels during the nighttime period would range from a low of 52.0 dBA (Leq1-hour) at the residential uses along Pincay Drive to the east (Site M) to a high of 74.6 dBA (Leq1-hour) at the residential uses along Locust Street to the east of the Market Street/Florence Avenue Station (Site 1) and the residential uses along Spruce Avenue to the east of the MSF (Site I). When considering the existing noise environment and the absolute noise levels during construction activities, noise levels would be below the FTA criteria threshold of 90 dBA (Leq-1hour) during the daytime and 80 dBA (Leq-1hour) during the nighttime period for residential uses. Additionally, noise levels would be below the FTA criteria threshold of 100 dBA (Leq-1hour) during the daytime and nighttime periods for commercial and industrial uses.

As mentioned previously, a 10 dBA change is subjectively heard as approximately doubling in loudness and can cause adverse response. Construction noise levels during the daytime period would result in maximum increases of 15.8 dBA above ambient at the residential uses along Locust Street to the east of the Market Street/Florence Avenue Station (Site 1). Additionally, construction noise levels during the nighttime period would result in maximum increases of 19.6 dBA above ambient at the residential uses along Locust Street to the east of the Market Street/Florence Avenue Station (Site 1). **PDF NOISE-1** includes implementation of a Construction Noise Control Plan which proactively addresses the potential effects of noise during construction. The measures required by the Construction Noise Control Plan can reduce noise levels by 10 dBA or more. For example, using optimal muffler systems on all equipment would reduce construction noise levels by 10 dBA or more.<sup>62</sup> Temporary abatement techniques such as the use of a noise barrier can achieve a 5-dBA noise level reduction when it is tall enough to break the line-of-sight to the receiver. Modifications such as dampening of metal surfaces or the redesign of a particular piece of equipment can

62 FHWA, *Special Report—Measurement, Prediction, and Mitigation*, updated June 2017, [https://www.fhwa.dot.gov/Environment/noise/construction\\_noise/special\\_report/hcn04.cfm](https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm), Accessed January 2021.

achieve noise reduction of up to 5 dBA.<sup>63</sup> Moving stationary equipment away from sensitive receptors will reduce noise levels at the receptor as every doubling of distance will reduce noise by 4 to 6 dBA. Thus, with the measures required by the CCP, construction noise will not increase ambient noise levels by more than 10 dBA. Furthermore, 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. With implementation of **PDF NOISE-1**, Phase 1 construction noise levels would be less than significant.

### Phase 2

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. **Table 4.10-16: Phase 2 Proposed Project Construction Noise Levels** presents the forecasted construction noise levels generated by construction equipment during Phase 2 at the nearby adjacent sensitive receptors. As shown, construction noise levels during the daytime period would range from a low of 51.1 dBA (Leq1-hour) at the commercial uses along Regent Street south of the Market Street/Florence Avenue Station (Site K) to a high of 75.8 dBA (Leq1-hour) at the residential uses along Spruce Avenue to the east of the MSF (Site I). Additionally, construction noise levels during the nighttime period would range from a low of 48.1 dBA (Leq1-hour) at the commercial uses along Regent Street south of the Market Street/Florence Avenue Station (Site K) to a high of 72.8 dBA (Leq1-hour) at the residential uses along Spruce Avenue to the east of the MSF (Site I). When taking into account the existing noise environment and the absolute noise levels during construction activities, noise levels would be below the FTA criteria threshold of 90 dBA (Leq-1hour) during the daytime and 80 dBA (Leq-1hour) during the nighttime period for residential uses. Additionally, noise levels would be below the FTA criteria threshold of 100 dBA (Leq-1hour) during the daytime and nighttime periods for commercial and industrial uses.

Construction noise levels during the daytime period would result in maximum increases of 8.5 dBA above ambient at the residential uses along Spruce Avenue to the east of the MSF (Site I). Additionally, construction noise level increases during the nighttime period would result in maximum increases of 14.5 dBA above ambient at the residential uses along Spruce Avenue to the east of the MSF (Site I). **PDF NOISE-1** includes implementation of a Construction Noise Control Plan which proactively addresses the potential effects of noise during construction. The measures required by the Construction Noise Control Plan can reduce noise levels by 10 dBA or more as discussed above for Phase 1. Furthermore, 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. With implementation of **PDF NOISE-1**, Phase 2 construction noise levels would be less than significant.

63 FHWA, *Special Report—Measurement, Prediction, and Mitigation*, updated June 2017, accessed July 2019, [https://www.fhwa.dot.gov/Environment/noise/construction\\_noise/special\\_report/hcn04.cfm](https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm).

Table 4.10-15  
Phase 1 Proposed Project Construction Noise Levels

Receptor	Existing Land Use	Time Period	dBa		Significance Threshold	Increase Over Significance Threshold	Significant Impact?
			Ambient Noise Levels	Construction Noise (Max Leq, 1hr)			
<b>Market Street Segment</b>							
Site 1	Residential	Daytime	61.9	77.6	90.0	--	No
		Nighttime	54.6	74.2	80.0	--	No
Site 2	Residential	Daytime	67.5	69.1	90.0	--	No
		Nighttime	64.1	66.1	80.0	--	No
Site A	Commercial	Daytime	64.1	60.9	100.0	--	No
		Nighttime	57.8	57.9	100.0	--	No
<b>Manchester Boulevard Segment</b>							
Site 2	Residential	Daytime	67.5	69.1	90.0	--	No
		Nighttime	64.1	66.1	80.0	--	No
Site B	Residential	Daytime	73.5	63.9	90.0	--	No
		Nighttime	70.5	60.9	80.0	--	No
Site I	Residential	Daytime	68.0	77.6	90.0	--	No
		Nighttime	58.5	74.6	80.0	--	No
Site J	Commercial/Mixed Use	Daytime	73.6	67.7	90.0	--	No
		Nighttime	69.1	64.7	80.0	--	No
Site L	Residential	Daytime	74.0	56.5	90.0	--	No
		Nighttime	72.8	53.5	80.0	--	No
<b>Prairie Avenue Segment</b>							
Site 3	Education/Residential	Daytime	71.2	74.3	100.0	--	No
		Nighttime	66.0	71.3	100.0	--	No
Site 4	Residential	Daytime	77.2	61.0	90.0	--	No

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Receptor	Existing Land Use	Time Period	dBa		Significance Threshold	Increase Over Significance Threshold	Significant Impact?
			Ambient Noise Levels	Construction Noise (Max Leq, 1hr)			
Site 5	Lodging	Nighttime	71.6	58.0	80.0	--	No
		Daytime	73.3	59.5	100.0	--	No
		Nighttime	70.0	56.5	100.0	--	No
Site C	Place of worship/Lodging	Daytime	76.7	56.6	100.0	--	No
		Nighttime	70.6	53.5	100.0	--	No
Site D	Lodging	Daytime	76.2	59.6	100.0	--	No
		Nighttime	67.0	56.6	100.0	--	No
Site E	Lodging	Daytime	72.6	58.1	100.0	--	No
		Nighttime	66.2	55.1	100.0	--	No
Site F	Residential	Daytime	68.8	66.2	90.0	--	No
		Nighttime	59.9	63.2	80.0	--	No
Site G	Residential	Daytime	67.3	60.6	90.0	--	No
		Nighttime	61.5	57.6	80.0	--	No
Site H	Education/Residential	Daytime	67.6	61.7	90.0	--	No
		Nighttime	56.6	58.7	80.0	--	No
Site K	Public	Daytime	67.5	73.1	100.0	--	No
		Nighttime	63.4	70.1	100.0	--	No
Site M	Residential	Daytime	74.9	55.0	90.0	--	No
		Nighttime	67.9	52.0	80.0	--	No

Source: SoundPLAN (version 8.2). Refer to Appendix N.4-2 for construction noise (Phase 1) worksheets.  
Note: 1. Logarithmic increase = Ambient Noise + Modeled Construction Level.

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Table 4.10-16  
Phase 2 Proposed Project Construction Noise Levels

Receptor	Existing Land Use	Time Period	dBa		Significance Threshold	Increase Over Significance Threshold	Significant Impact?
			Ambient Noise Levels	Construction Noise (Max Leq, 1hr)			
<b>Market Street Segment</b>							
Site 1	Residential	Daytime	61.9	51.9	90.0	--	No
		Nighttime	54.6	48.8	80.0	--	No
Site 2	Residential	Daytime	67.5	67.7	90.0	--	No
		Nighttime	64.1	64.7	80.0	--	No
Site A	Commercial	Daytime	64.1	53.2	100.0	--	No
		Nighttime	57.8	50.2	100.0	--	No
<b>Manchester Boulevard Segment</b>							
Site 2	Residential	Daytime	67.5	67.7	90.0	--	No
		Nighttime	64.1	64.7	80.0	--	No
Site B	Residential	Daytime	73.5	64.9	90.0	--	No
		Nighttime	70.5	61.9	80.0	--	No
Site I	Residential	Daytime	68.0	75.8	90.0	--	No
		Nighttime	58.5	72.8	80.0	--	No
Site J	Commercial/Mixed Use	Daytime	73.6	55.1	90.0	--	No
		Nighttime	69.1	52.1	80.0	--	No
Site L	Residential	Daytime	74.0	53.7	90.0	--	No
		Nighttime	72.8	50.7	80.0	--	No
<b>Prairie Avenue Segment</b>							
Site 3	Education/Residential	Daytime	71.2	71.3	100.0	--	No
		Nighttime	66.0	68.3	100.0	--	No
Site 4	Residential	Daytime	77.2	72.7	90.0	--	No

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Receptor	Existing Land Use	Time Period	dBa		Significance Threshold	Increase Over Significance Threshold	Significant Impact?
			Ambient Noise Levels	Construction Noise (Max Leq, 1hr)			
Site 5	Lodging	Nighttime	71.6	69.7	80.0	--	No
		Daytime	73.3	54.9	100.0	--	No
		Nighttime	70.0	51.9	100.0	--	No
Site C	Place of worship/Lodging	Daytime	76.7	72.6	100.0	--	No
		Nighttime	70.6	69.6	100.0	--	No
Site D	Lodging	Daytime	76.2	56.0	100.0	--	No
		Nighttime	67.0	53.0	100.0	--	No
Site E	Lodging	Daytime	72.6	54.7	100.0	--	No
		Nighttime	66.2	51.6	100.0	--	No
Site F	Residential	Daytime	68.8	65.2	90.0	--	No
		Nighttime	59.9	62.2	80.0	--	No
Site G	Residential	Daytime	67.3	65.5	90.0	--	No
		Nighttime	61.5	62.5	80.0	--	No
Site H	Education/Residential	Daytime	67.6	66.7	90.0	--	No
		Nighttime	56.6	63.8	80.0	--	No
Site K	Public	Daytime	67.5	51.1	100.0	--	No
		Nighttime	63.4	48.1	100.0	--	No
Site M	Residential	Daytime	74.9	53.2	90.0	--	No
		Nighttime	67.9	50.2	80.0	--	No

Source: SoundPLAN (version 8.2). Refer to Appendix N.4-3 for construction noise (Phase 2) worksheets.  
Note: 1. Logarithmic Increase = Ambient Noise + Modeled Construction Level.

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**Phase 3**

Phase 3 would include foundation work for the ATS guideway, foundation work for the Market Street/Florence Ave Station, and construction for the support structure of the MSF building. Phase 3 work will include utility relocation (if necessary), foundations, CIP columns, and setting of prefabricated buildings at the PDSs. **Table 4.10-17: Phase 3 Proposed Project Construction Noise Levels** presents the forecasted construction noise levels generated by construction equipment during Phase 3 of the nearby adjacent sensitive receptors. As shown, construction noise levels during the daytime period would range from a low of 50.1 dBA (Leq1-hour) at the residential and commercial uses along Century Boulevard south of the Prairie Avenue/Hardy Street Station (Site E) to a high of 77.1 dBA (Leq1-hour) at the residential uses along Spruce Avenue to the east of the MSF (Site I). Additionally, construction noise levels during the nighttime period would range from a low of 47.1 dBA (Leq1-hour) at the residential and commercial uses along Century Boulevard south of the Prairie Avenue/Hardy Street Station (Site E) to a high of 74.1 dBA (Leq1-hour) at the residential uses along Spruce Avenue to the east of the MSF (Site I). When taking into account the existing noise environment and the absolute noise levels during construction activities, noise levels would be below the FTA criteria threshold of 90 dBA (Leq-1hour) during the daytime and 80 dBA (Leq-1hour) during the nighttime period for residential uses. Additionally, noise levels would be below the FTA criteria threshold of 100 dBA (Leq-1hour) during the daytime and nighttime periods for commercial and industrial uses.

Construction noise level increases during the daytime period would result in maximum increases of 9.6 dBA above ambient at the residential uses along Spruce Avenue to the east of the MSF (Site I). Additionally, construction noise level increases during the nighttime period would result in maximum increases of 15.7 dBA at the residential uses along Spruce Avenue to the east of the MSF (Site I). **PDF NOISE-1** includes implementation of a Construction Noise Control Plan which proactively addresses the potential effects of noise during construction. The measures required by the Construction Noise Control Plan can reduce noise levels by 10 dBA or more as discussed above for Phase 1. Furthermore, 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. With implementation of **PDF NOISE-1**, Phase 3 construction noise levels would be less than significant.

**Phase 4**

Phase 4 construction would include foundation work for the ATS guideway, guideway column caps along Market Street, and the MSF building deck and shell. Phase 4 activities will include utility relocation (if necessary), foundations, CIP columns, guideway column caps, and installation of equipment at the TPDSS. **Table 4.10-18: Phase 4 Proposed Project Construction Noise Levels**, presents the forecasted construction noise levels generated by construction equipment during Phase 4 of the nearby adjacent sensitive

receptors. As shown, construction noise levels during the daytime period would range from a low of 56.2 dBA (Leq1-hour) at the residential along Pincay Drive to the east of the Prairie Avenue/Manchester Boulevard Station (Site M) to a high of 77.8 dBA (Leq1-hour) at the residential uses along Spruce Avenue to the east of the MSF (Site I). Additionally, construction noise levels during the nighttime period would range from a low of 53.2 dBA (Leq1-hour) at the residential along Pincay Drive to the east of the Prairie Avenue/Manchester Boulevard Station (Site M) to a high of 74.8 dBA (Leq1-hour) at the residential uses along Spruce Avenue to the east of the MSF (Site I). When taking into account the existing noise environment and the absolute noise levels during construction activities, noise levels would be below the FTA criteria threshold of 90 dBA (Leq-1hour) during the daytime and 80 dBA (Leq-1hour) during the nighttime period for residential uses. Additionally, noise levels would be below the FTA criteria threshold of 100 dBA (Leq-1hour) during the daytime and nighttime periods for commercial and industrial uses.

Construction noise level increases during the daytime period would result in maximum increases of 10.2 dBA above ambient at the residential uses along Spruce Avenue to the east of the MSF (Site I). Additionally, construction noise level increases during the nighttime period would result in maximum increases of 16.4 dBA at the residential uses along Spruce Avenue to the east of the MSF (Site I). **PDF NOISE-1** includes implementation of a Construction Noise Control Plan which proactively addresses the potential effects of noise during construction. The measures required by the Construction Noise Control Plan can reduce noise levels by 10 dBA or more as discussed above for Phase 1. Furthermore, 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. With implementation of **PDF NOISE-1**, Phase 4 construction noise levels would be less than significant.

Table 4.10-17  
Phase 3 Proposed Project Construction Noise Levels

Receptor	Existing Land Use	Time Period	dBa		Significance Threshold	Increase Over Significance Threshold	Significant Impact?
			Ambient Noise Levels	Construction Noise (Max Leq, 1hr)			
<b>Market Street Segment</b>							
Site 1	Residential	Daytime	61.9	69.9	90.0	--	No
		Nighttime	54.6	66.9	80.0	--	No
Site 2	Residential	Daytime	67.5	74.1	90.0	--	No
		Nighttime	64.1	71.1	80.0	--	No
Site A	Commercial	Daytime	64.1	72.4	100.0	--	No
		Nighttime	57.8	69.4	100.0	--	No
<b>Manchester Boulevard Segment</b>							
Site 2	Residential	Daytime	67.5	74.1	90.0	--	No
		Nighttime	64.1	71.1	80.0	--	No
Site B	Residential	Daytime	73.5	73.2	90.0	--	No
		Nighttime	70.5	70.2	80.0	--	No
Site I	Residential	Daytime	68.0	77.1	90.0	--	No
		Nighttime	58.5	74.1	80.0	--	No
Site J	Commercial/Mixed Use	Daytime	73.6	70.5	90.0	--	No
		Nighttime	69.1	67.5	80.0	--	No
Site L	Residential	Daytime	74.0	55.2	90.0	--	No
		Nighttime	72.8	52.2	80.0	--	No
<b>Prairie Avenue Segment</b>							
Site 3	Education/Residential	Daytime	71.2	69.1	100.0	--	No
		Nighttime	66.0	66.1	100.0	--	No
Site 4	Residential	Daytime	77.2	53.6	90.0	--	No

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Receptor	Existing Land Use	Time Period	dBa		Significance Threshold	Increase Over Significance Threshold	Significant Impact?
			Ambient Noise Levels	Construction Noise (Max Leq, 1hr)			
Site 5	Lodging	Nighttime	71.6	50.6	80.0	--	No
		Daytime	73.3	52.2	100.0	--	No
		Nighttime	70.0	49.2	100.0	--	No
Site C	Place of worship/Lodging	Daytime	76.7	53.1	100.0	--	No
		Nighttime	70.6	50.1	100.0	--	No
Site D	Lodging	Daytime	76.2	52.7	100.0	--	No
		Nighttime	67.0	49.7	100.0	--	No
Site E	Lodging	Daytime	72.6	50.1	100.0	--	No
		Nighttime	66.2	47.1	100.0	--	No
Site F	Residential	Daytime	68.8	57.1	90.0	--	No
		Nighttime	59.9	54.1	80.0	--	No
Site G	Residential	Daytime	67.3	56.9	90.0	--	No
		Nighttime	61.5	53.9	80.0	--	No
Site H	Education/Residential	Daytime	67.6	61.8	90.0	--	No
		Nighttime	56.6	58.8	80.0	--	No
Site K	Public	Daytime	67.5	71.3	100.0	--	No
		Nighttime	63.4	68.3	100.0	--	No
Site M	Residential	Daytime	74.9	52.5	90.0	--	No
		Nighttime	67.9	49.5	80.0	--	No

Source: SoundPLAN (version 8.2). Refer to Appendix N.4-4 for construction noise (Phase 3) worksheets.  
Note: 1. Logarithmic increase = Ambient Noise + Modeled Construction Level.

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**Table 4.10-18**  
**Phase 4 Proposed Project Construction Noise Levels**

Receptor	Existing Land Use	Time Period	Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
			dBA					
<b>Market Street Segment</b>								
Site 1	Residential	Daytime	61.9	70.5	71.0	90.0	--	No
		Nighttime	54.6	67.5	67.7	80.0	--	No
Site 2	Residential	Daytime	67.5	74.9	75.6	90.0	--	No
		Nighttime	64.1	71.9	72.6	80.0	--	No
Site A	Commercial	Daytime	64.1	73.0	73.5	100.0	--	No
		Nighttime	57.8	70.0	70.3	100.0	--	No
<b>Manchester Boulevard Segment</b>								
Site 2	Residential	Daytime	67.5	74.9	75.6	90.0	--	No
		Nighttime	64.1	71.9	72.6	80.0	--	No
Site B	Residential	Daytime	73.5	74.4	77.0	90.0	--	No
		Nighttime	70.5	71.4	74.0	80.0	--	No
Site I	Residential	Daytime	68.0	77.8	78.2	90.0	--	No
		Nighttime	58.5	74.8	74.9	80.0	--	No
Site J	Commercial/Mixed Use	Daytime	73.6	71.2	75.6	90.0	--	No
		Nighttime	69.1	68.2	71.7	80.0	--	No
Site L	Residential	Daytime	74.0	57.1	74.1	90.0	--	No
		Nighttime	72.8	54.1	72.9	80.0	--	No
<b>Prairie Avenue Segment</b>								
Site 3	Education/Residential	Daytime	71.2	73.8	75.7	100.0	--	No
		Nighttime	66.0	70.8	72.0	100.0	--	No
Site 4	Residential	Daytime	77.2	74.3	79.0	90.0	--	No

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Receptor	Existing Land Use	Time Period	Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
			dBA					
Site 5	Lodging	Nighttime	71.6	71.3	74.5	80.0	--	No
		Daytime	73.3	57.0	73.4	100.0	--	No
		Nighttime	70.0	54.0	70.1	100.0	--	No
Site C	Place of worship/Lodging	Daytime	76.7	74.2	78.6	100.0	--	No
		Nighttime	70.6	71.2	73.9	100.0	--	No
Site D	Lodging	Daytime	76.2	58.0	76.3	100.0	--	No
		Nighttime	67.0	55.0	67.3	100.0	--	No
Site E	Lodging	Daytime	72.6	56.8	72.7	100.0	--	No
		Nighttime	66.2	53.7	66.4	100.0	--	No
Site F	Residential	Daytime	68.8	66.9	71.0	90.0	--	No
		Nighttime	59.9	63.9	65.4	80.0	--	No
Site G	Residential	Daytime	67.3	67.3	70.3	90.0	--	No
		Nighttime	61.5	64.3	66.1	80.0	--	No
Site H	Education/Residential	Daytime	67.6	69.0	71.4	90.0	--	No
		Nighttime	56.6	66.0	66.5	80.0	--	No
Site K	Public	Daytime	67.5	71.9	73.2	100.0	--	No
		Nighttime	63.4	68.9	70.0	100.0	--	No
Site M	Residential	Daytime	74.9	56.2	75.0	90.0	--	No
		Nighttime	67.9	53.2	68.0	80.0	--	No

Source: SoundPLAN (version 8.2). Refer to Appendix N.4-5 for construction noise (Phase 4) worksheets.  
Note: <sup>1</sup> Logarithmic increase = Ambient Noise + Modeled Construction Level.

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**Phase 5**

Phase 5 construction 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 will include guideway girders, guideway straddle caps, and installation of equipment at the PDSs. **Table 4.10-19: Phase 5 Proposed Project Construction Noise Levels**, presents the forecasted construction noise levels generated by construction equipment during Phase 5 of the nearby adjacent sensitive receptors. As shown, construction noise levels during the daytime period would range from a low of 55.8 dBA (Leq1-hour) at the residential uses along Manchester Boulevard to the east of the Prairie Avenue/Manchester Boulevard Station (Site L) to a high of 74.6 dBA (Leq1-hour) at the residential and commercial uses along Manchester Boulevard (Site B). Additionally, construction noise levels during the nighttime period would range from a low of 52.8 dBA (Leq1-hour) at the residential uses along Manchester Boulevard to the east of the Prairie Avenue/Manchester Boulevard Station (Site L) to a high of 71.6 dBA (Leq1-hour) at the residential and commercial uses along Manchester Boulevard (Site B). When taking into account the existing noise environment and the absolute noise levels during construction activities, noise levels would be below the FTA criteria threshold of 90 dBA (Leq-1hour) during the daytime and 80 dBA (Leq-1hour) during the nighttime period for residential uses. Additionally, noise levels would be below the FTA criteria threshold of 100 dBA (Leq-1hour) during the daytime and nighttime periods for commercial and industrial uses.

Construction noise level increases during the daytime period would result in maximum increases of 9.6 dBA above ambient at the commercial uses along Queen Street and Market Street (Site A). Additionally, construction noise level increases during the nighttime period would result in maximum increases of 12.6 dBA above ambient at the commercial uses along Queen Street and Market Street (Site A). **PDF NOISE-1** includes implementation of a Construction Noise Control Plan which proactively addresses the potential effects of noise during construction. The measures required by the Construction Noise Control Plan can reduce noise levels by 10 dBA or more as discussed above for Phase 1. Furthermore, 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. With implementation of **PDF NOISE-1**, Phase 5 construction noise levels would be less than significant.

**Phase 6**

Phase 6 construction 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, completion of Prairie/Manchester Station, completion of Hardy Station, and completion of the MSF building, and the elevated passenger walkway to the Metro Crenshaw/LAX Line Downtown Inglewood

Station. **Table 4.10-20: Phase 6 Proposed Project Construction Noise Levels**, presents the forecasted construction noise levels generated by construction equipment during Phase 6 of the nearby adjacent sensitive receptors. As shown, construction noise levels during the daytime period would range from a low of 54.0 dBA (Leq1-hour) at the residential uses along Pincay Drive to the southeast of the Prairie Avenue/Manchester Boulevard Station (Site M) to a high of 75.0 dBA (Leq1-hour) at the residential uses along Spruce Avenue to the east of the MSF (Site I). Additionally, construction noise levels during the nighttime period would range from a low of 51.0 dBA (Leq1-hour) at the residential uses along Pincay Drive to the southeast of the Prairie Avenue/Manchester Boulevard Station (Site M) to a high of 72.0 dBA (Leq1-hour) at the residential uses along Spruce Avenue to the east of the MSF (Site I). When taking into account the existing noise environment and the absolute noise levels during construction activities, noise levels would be below the FTA criteria threshold of 90 dBA (Leq-1hour) during the daytime and 80 dBA (Leq-1hour) during the nighttime period for residential uses. Additionally, noise levels would be below the FTA criteria threshold of 100 dBA (Leq-1hour) during the daytime and nighttime periods for commercial and industrial uses.

Construction noise level increases during the daytime period would result in maximum increases of 7.8 dBA above ambient at the residential uses along Spruce Avenue to the east of the MSF (Site I). Additionally, construction noise level increases during the nighttime period would result in maximum increases of 13.7 dBA above ambient at the residential uses along Spruce Avenue to the east of the MSF (Site I). **PDF NOISE-1** includes implementation of a Construction Noise Control Plan which proactively addresses the potential effects of noise during construction. The measures required by the Construction Noise Control Plan can reduce noise levels by 10 dBA or more as discussed above for Phase 1. Furthermore, 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. With implementation of **PDF NOISE-1**, Phase 6 construction noise levels would be less than significant.

**Table 4.10-19**  
**Phase 5 Proposed Project Construction Noise Levels**

Receptor	Existing Land Use	Time Period	Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
			dBa					
<b>Market Street Segment</b>								
Site 1	Residential	Daytime	61.9	70.7	71.2	90.0	--	No
		Nighttime	54.6	67.7	67.9	80.0	--	No
Site 2	Residential	Daytime	67.5	74.5	75.3	90.0	--	No
		Nighttime	64.1	71.4	72.1	80.0	--	No
Site A	Commercial	Daytime	64.1	73.2	73.7	100.0	--	No
		Nighttime	57.8	70.2	70.4	100.0	--	No
<b>Manchester Boulevard Segment</b>								
Site 2	Residential	Daytime	67.5	74.5	75.3	90.0	--	No
		Nighttime	64.1	71.4	72.1	80.0	--	No
Site B	Residential	Daytime	73.5	74.6	77.1	90.0	--	No
		Nighttime	70.5	71.6	74.1	80.0	--	No
Site I	Residential	Daytime	68.0	71.0	72.8	90.0	--	No
		Nighttime	58.5	68.0	68.5	80.0	--	No
Site J	Commercial/Mixed Use	Daytime	73.6	71.3	75.6	90.0	--	No
		Nighttime	69.1	68.3	71.7	80.0	--	No
Site L	Residential	Daytime	74.0	55.8	74.1	90.0	--	No
		Nighttime	72.8	52.8	72.8	80.0	--	No
<b>Prairie Avenue Segment</b>								
Site 3	Education/Residential	Daytime	71.2	73.9	75.8	100.0	--	No
		Nighttime	66.0	70.9	72.1	100.0	--	No
Site 4	Residential	Daytime	77.2	74.5	79.1	90.0	--	No

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Receptor	Existing Land Use	Time Period	Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
			dBa					
Site 5	Lodging	Nighttime	71.6	71.5	74.6	80.0	--	No
		Daytime	73.3	56.7	73.4	100.0	--	No
		Nighttime	70.0	53.7	70.1	100.0	--	No
Site C	Place of worship/Lodging	Daytime	76.7	74.4	78.7	100.0	--	No
		Nighttime	70.6	71.4	74.0	100.0	--	No
Site D	Lodging	Daytime	76.2	57.7	76.3	100.0	--	No
		Nighttime	67.0	54.7	67.2	100.0	--	No
Site E	Lodging	Daytime	72.6	56.9	72.7	100.0	--	No
		Nighttime	66.2	53.9	66.4	100.0	--	No
Site F	Residential	Daytime	68.8	67.1	71.0	90.0	--	No
		Nighttime	59.9	64.0	65.4	80.0	--	No
Site G	Residential	Daytime	67.3	67.3	70.3	90.0	--	No
		Nighttime	61.5	64.3	66.1	80.0	--	No
Site H	Education/Residential	Daytime	67.6	68.9	71.3	90.0	--	No
		Nighttime	56.6	65.9	66.4	80.0	--	No
Site K	Public	Daytime	67.5	72.1	73.4	100.0	--	No
		Nighttime	63.4	69.1	70.1	100.0	--	No
Site M	Residential	Daytime	74.9	56.0	75.0	90.0	--	No
		Nighttime	67.9	53.0	68.0	80.0	--	No

Source: SoundPLAN (version 8.2). Refer to Appendix N.4-6 for construction noise (Phase 5) worksheets.  
Note: <sup>1</sup> Logarithmic increase = Ambient Noise + Modeled Construction Level.

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**Table 4.10-20  
Phase 6 Proposed Project Construction Noise Levels**

Receptor	Existing Land Use	Time Period	Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
			dBa					
<b>Market Street Segment</b>								
Site 1	Residential	Daytime	61.9	66.7	67.9	90.0	--	No
		Nighttime	54.6	63.7	64.2	80.0	--	No
Site 2	Residential	Daytime	67.5	72.8	73.9	90.0	--	No
		Nighttime	64.1	69.8	70.8	80.0	--	No
Site A	Commercial	Daytime	64.1	59.4	65.4	100.0	--	No
		Nighttime	57.8	56.4	60.2	100.0	--	No
<b>Manchester Boulevard Segment</b>								
Site 2	Residential	Daytime	67.5	72.8	73.9	90.0	--	No
		Nighttime	64.1	69.8	70.8	80.0	--	No
Site B	Residential	Daytime	73.5	72.7	76.1	90.0	--	No
		Nighttime	70.5	69.7	73.1	80.0	--	No
Site I	Residential	Daytime	68.0	75.0	75.8	90.0	--	No
		Nighttime	58.5	72.0	72.2	80.0	--	No
Site J	Commercial/Mixed Use	Daytime	73.6	65.4	74.2	90.0	--	No
		Nighttime	69.1	62.4	69.9	80.0	--	No
Site L	Residential	Daytime	74.0	54.1	74.0	90.0	--	No
		Nighttime	72.8	51.1	72.8	80.0	--	No
<b>Prairie Avenue Segment</b>								
Site 3	Education/Residential	Daytime	71.2	72.0	74.6	100.0	--	No
		Nighttime	66.0	69.0	70.8	100.0	--	No
Site 4	Residential	Daytime	77.2	72.6	78.5	90.0	--	No

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Receptor	Existing Land Use	Time Period	Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
			dBa					
Site 5	Lodging	Nighttime	71.6	69.6	73.7	80.0	--	No
		Daytime	73.3	54.8	73.4	100.0	--	No
		Nighttime	70.0	51.8	70.1	100.0	--	No
Site C	Place of worship/Lodging	Daytime	76.7	72.5	78.1	100.0	--	No
		Nighttime	70.6	69.5	73.1	100.0	--	No
Site D	Lodging	Daytime	76.2	55.9	76.2	100.0	--	No
		Nighttime	67.0	52.9	67.2	100.0	--	No
Site E	Lodging	Daytime	72.6	54.9	72.7	100.0	--	No
		Nighttime	66.2	51.9	66.4	100.0	--	No
Site F	Residential	Daytime	68.8	65.2	70.4	90.0	--	No
		Nighttime	59.9	62.2	64.2	80.0	--	No
Site G	Residential	Daytime	67.3	65.5	69.5	90.0	--	No
		Nighttime	61.5	62.4	65.0	80.0	--	No
Site H	Education/Residential	Daytime	67.6	67.0	70.3	90.0	--	No
		Nighttime	56.6	64.0	64.7	80.0	--	No
Site K	Public	Daytime	67.5	62.2	68.6	100.0	--	No
		Nighttime	63.4	59.2	64.8	100.0	--	No
Site M	Residential	Daytime	74.9	54.0	74.9	90.0	--	No
		Nighttime	67.9	51.0	68.0	80.0	--	No

Source: SoundPLAN (version 8.2). Refer to **Appendix N-4-7** for construction noise (Phase 6) worksheets.  
Note: <sup>1</sup> Logarithmic increase = Ambient Noise + Modeled Construction Level.

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**Phase 7**

Phase 7 construction would include final site work and completion of the stations. **Table 4.10-21: Phase 7 Proposed Project Construction Noise Levels**, presents the forecasted construction noise levels generated by construction equipment during Phase 7 of the nearby adjacent sensitive receptors. As shown, construction noise levels during the daytime period would range from a low of 51.3 dBA (Leq1-hour) at the residential uses along Pincay Drive to the southeast of the Prairie Avenue/Manchester Boulevard Station (Site M) to a high of 75.6 dBA (Leq1-hour) at the residential uses along Spruce Avenue to the east of the MSF (Site I). Additionally, construction noise levels during the nighttime period would range from a low of 48.3 dBA (Leq1-hour) at the residential uses along Pincay Drive to the southeast of the Prairie Avenue/Manchester Boulevard Station (Site M) to a high of 72.6 dBA (Leq1-hour) at the residential uses along Spruce Avenue to the east of the MSF (Site I). When taking into account the existing noise environment and the absolute noise levels during construction activities, noise levels would be below the FTA criteria threshold of 90 dBA (Leq-1hour) during the daytime and 80 dBA (Leq-1hour) during the nighttime period for residential uses. Additionally, noise levels would be below the FTA criteria threshold of 100 dBA (Leq-1hour) during the daytime and nighttime periods for commercial and industrial uses.

Construction noise level increases during the daytime period would result in maximum increases of 9.0 dBA above ambient at the residential uses along Locust Street to the east of the Market Street/Florence Avenue Station (Site 1). Additionally, construction noise level increases during the nighttime period would result in maximum increases of 14.3 dBA above ambient at the residential uses along Spruce Avenue to the east of the MSF (Site I). **PDF NOISE-1** includes implementation of a Construction Noise Control Plan which proactively addresses the potential effects of noise during construction as discussed above for Phase 1. Furthermore, 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. With implementation of **PDF NOISE-1**, Phase 7 construction noise levels would be less than significant.

**Phase 8**

Phase 8 construction 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. **Table 4.10-22: Phase 8 Proposed Project Construction Noise Levels**, presents the forecasted construction noise levels generated by construction equipment during Phase 8 of the nearby adjacent sensitive receptors. As shown, construction noise levels during the daytime period would range from a low of 60.9 dBA (Leq1-hour) at the residential uses along Manchester Boulevard to the east of the Prairie Avenue/Manchester Boulevard Station (Site L) to a high of 79.6 dBA (Leq1-hour) at the residential uses along Manchester Drive to the northeast of the MSF (Site 2). Additionally, construction noise levels during the nighttime period would range from a low of 57.9 dBA (Leq1-hour) at the residential uses along Manchester Boulevard to

the east of the Prairie Avenue/Manchester Boulevard Station (Site L) to a high of 76.5 dBA (Leq1-hour) at the residential uses along Manchester Drive to the northeast of the MSF (Site 2). When taking into account the existing noise environment and the absolute noise levels during construction activities, noise levels would be below the FTA criteria threshold of 90 dBA (Leq-1hour) during the daytime and 80 dBA (Leq-1hour) during the nighttime period for residential uses. Additionally, noise levels would be below the FTA criteria threshold of 100 dBA (Leq-1hour) during the daytime and nighttime periods for commercial and industrial uses.

Construction noise level during the daytime period would result in maximum increases of 14.4 dBA above ambient at the commercial uses along Queen Street and Market Street (Site A). Additionally, construction noise level increases during the nighttime period would result in maximum increases of 18.3 dBA above ambient at the residential uses along Locust Street to the east of the Market Street/Florence Avenue Station (Site 1). **PDF NOISE-1** includes implementation of a Construction Control Plan which proactively addresses the potential effects of noise during construction. The measures required by the Construction Noise Control Plan can reduce noise levels by 10 dBA or more as discussed above for Phase 1. Furthermore, 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. With implementation of **PDF NOISE-1**, Phase 2 construction noise levels would be less than significant.

**Table 4.10-21  
Phase 7 Proposed Project Construction Noise Levels**

Receptor	Existing Land Use	Time Period	Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
			dB(A)					
<b>Market Street Segment</b>								
Site 1	Residential	Daytime	61.9	70.3	70.9	90.0	--	No
		Nighttime	54.6	67.3	67.5	80.0	--	No
Site 2	Residential	Daytime	67.5	66.5	70.0	90.0	--	No
		Nighttime	64.1	63.4	66.8	80.0	--	No
Site A	Commercial	Daytime	64.1	57.0	64.9	100.0	--	No
		Nighttime	57.8	54.0	59.3	100.0	--	No
<b>Manchester Boulevard Segment</b>								
Site 2	Residential	Daytime	67.5	66.5	70.0	90.0	--	No
		Nighttime	64.1	63.4	66.8	80.0	--	No
Site B	Residential	Daytime	73.5	61.9	73.8	90.0	--	No
		Nighttime	70.5	58.9	70.8	80.0	--	No
Site I	Residential	Daytime	68.0	75.6	76.3	90.0	--	No
		Nighttime	58.5	72.6	72.8	80.0	--	No
Site J	Commercial/Mixed Use	Daytime	73.6	66.8	74.4	90.0	--	No
		Nighttime	69.1	63.8	70.2	80.0	--	No
Site L	Residential	Daytime	74.0	53.0	74.0	90.0	--	No
		Nighttime	72.8	49.9	72.8	80.0	--	No
<b>Prairie Avenue Segment</b>								
Site 3	Education/Residential	Daytime	71.2	73.5	75.5	100.0	--	No
		Nighttime	66.0	70.5	71.8	100.0	--	No
Site 4	Residential	Daytime	77.2	55.0	77.2	90.0	--	No

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Receptor	Existing Land Use	Time Period	Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
			dB(A)					
Site 5	Lodging	Nighttime	71.6	52.0	71.6	80.0	--	No
		Daytime	73.3	54.1	73.4	100.0	--	No
		Nighttime	70.0	51.1	70.1	100.0	--	No
Site C	Place of worship/Lodging	Daytime	76.7	51.9	76.7	100.0	--	No
		Nighttime	70.6	48.9	70.6	100.0	--	No
Site D	Lodging	Daytime	76.2	55.2	76.2	100.0	--	No
		Nighttime	67.0	52.2	67.1	100.0	--	No
Site E	Lodging	Daytime	72.6	53.6	72.7	100.0	--	No
		Nighttime	66.2	50.6	66.3	100.0	--	No
Site F	Residential	Daytime	68.8	62.2	69.7	90.0	--	No
		Nighttime	59.9	59.2	62.6	80.0	--	No
Site G	Residential	Daytime	67.3	55.3	67.6	90.0	--	No
		Nighttime	61.5	52.3	62.0	80.0	--	No
Site H	Education/Residential	Daytime	67.6	58.7	68.1	90.0	--	No
		Nighttime	56.6	55.6	59.1	80.0	--	No
Site K	Public	Daytime	67.5	70.2	72.1	100.0	--	No
		Nighttime	63.4	67.2	68.7	100.0	--	No
Site M	Residential	Daytime	74.9	51.3	74.9	90.0	--	No
		Nighttime	67.9	48.3	67.9	80.0	--	No

Source: SoundPLAN (version 8.2). Refer to **Appendix N.4-8** for construction noise (Phase 7) worksheets.  
Note: <sup>1</sup> Logarithmic Increase = Ambient Noise + Modeled Construction Level.

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**Table 4.10-22  
Phase 8 Proposed Project Construction Noise Levels**

Receptor	Existing Land Use	Time Period	Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
			dB(A)					
<b>Market Street Segment</b>								
Site 1	Residential	Daytime	61.9	75.8	76.0	90.0	--	No
		Nighttime	54.6	72.8	72.9	80.0	--	No
Site 2	Residential	Daytime	67.5	79.6	79.9	90.0	--	No
		Nighttime	64.1	76.5	76.7	80.0	--	No
Site A	Commercial	Daytime	64.1	78.3	78.5	100.0	--	No
		Nighttime	57.8	75.3	75.4	100.0	--	No
<b>Manchester Boulevard Segment</b>								
Site 2	Residential	Daytime	67.5	79.6	79.9	90.0	--	No
		Nighttime	64.1	76.5	76.7	80.0	--	No
Site B	Residential	Daytime	73.5	79.7	80.6	90.0	--	No
		Nighttime	70.5	76.7	77.6	80.0	--	No
Site I	Residential	Daytime	68.0	76.1	76.7	90.0	--	No
		Nighttime	58.5	73.1	73.2	80.0	--	No
Site J	Commercial/Mixed Use	Daytime	73.6	76.4	78.2	90.0	--	No
		Nighttime	69.1	73.4	74.8	80.0	--	No
Site L	Residential	Daytime	74.0	60.9	74.2	90.0	--	No
		Nighttime	72.8	57.9	72.9	80.0	--	No
<b>Prairie Avenue Segment</b>								
Site 3	Education/Residential	Daytime	71.2	79.0	79.7	100.0	--	No
		Nighttime	66.0	76.0	76.4	100.0	--	No
Site 4	Residential	Daytime	77.2	79.6	81.6	90.0	--	No

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Receptor	Existing Land Use	Time Period	Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
			dB(A)					
Site 5	Lodging	Nighttime	71.6	76.6	77.8	80.0	--	No
		Daytime	73.3	61.8	73.6	100.0	--	No
		Nighttime	70.0	58.8	70.3	100.0	--	No
Site C	Place of worship/Lodging	Daytime	76.7	79.5	81.3	100.0	--	No
		Nighttime	70.6	76.5	77.5	100.0	--	No
Site D	Lodging	Daytime	76.2	62.8	76.4	100.0	--	No
		Nighttime	67.0	59.8	67.8	100.0	--	No
Site E	Lodging	Daytime	72.6	62.0	73.0	100.0	--	No
		Nighttime	66.2	59.0	67.0	100.0	--	No
Site F	Residential	Daytime	68.8	72.2	73.8	90.0	--	No
		Nighttime	59.9	69.1	69.6	80.0	--	No
Site G	Residential	Daytime	67.3	72.4	73.6	90.0	--	No
		Nighttime	61.5	69.4	70.0	80.0	--	No
Site H	Education/Residential	Daytime	67.6	74.0	74.9	90.0	--	No
		Nighttime	56.6	71.0	71.2	80.0	--	No
Site K	Public	Daytime	67.5	77.2	77.6	100.0	--	No
		Nighttime	63.4	74.2	74.5	100.0	--	No
Site M	Residential	Daytime	74.9	61.1	75.1	90.0	--	No
		Nighttime	67.9	58.1	68.3	80.0	--	No

Source: SoundPLAN (version 8.2). Refer to Appendix N.4-9 for construction noise (Phase 8) worksheets.  
Note: <sup>1</sup> Logarithmic Increase = Ambient Noise + Modeled Construction Level.

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### **Potential Health Effects of Proposed Project Construction Noise**

As mentioned previously, construction is planned to occur in multiple phases over approximately 46 months between January 2024 and November 2027. Construction noise levels were based on acoustical use factor, maximum noise levels, and the logarithmic sum of all pieces of equipment operated simultaneously within a specified area. As detailed in **Tables 4.10-15** through **4.10-22**, construction noise levels would not exceed the FTA criteria threshold of 90 dBA (Leq-1hour) during the daytime and 80 dBA (Leq-1hour) during the nighttime period for residential uses and 100 dBA (Leq-1hour) during the daytime and nighttime periods for commercial and industrial uses. Additionally, **PDF NOISE-1** includes implementation of a Construction Noise Control Plan which proactively addresses the potential effects of noise during construction. The measures required by the Construction Noise Control Plan can reduce noise levels by 10 dBA or more. As shown in **Table 4.10-1** above, when measured on the A-scale of a standard sound level meter, short-term noise levels constituting the threshold of pain and hearing damage are between 130 dBA and 140 dBA.

With respect to potential nighttime disturbance from construction noise, the areas along the proposed alignment for the ATS system where there is the potential for sleep disturbance during nighttime construction has been identified. Construction activities will occur adjacent to residential uses, especially adjacent to the MSF site and other areas along the proposed Project.

According to the Acoustical Society of America, receivers that would experience an indoor SEL of 50 dBA or lower would have an awakening probability of zero.<sup>64</sup> Based on the assumption that standard building construction in a warm climate area such as southern California offers an exterior-to-interior attenuation rate of 12 dB, it is assumed that indoor SEL would be 12 dB lower than exterior construction noise levels.<sup>65</sup> The area surrounding the proposed Project that would experience an indoor SEL of greater than 50 dBA (exterior construction noise level of greater than 62 dBA Leq) during a worst-case or loudest maximum nighttime construction noise level event was identified. This does not take into account the existing indoor SEL currently experienced due to aircraft flyovers from LAX and/or other existing noise sources in the area such as traffic and industrial operations. Based on the preceding impact analyses provided in **Tables 4.10-15** through **4.10-22**, exterior noise levels at all analyzed locations would be above 62 dBA Leq prior to the addition of construction noise.

Due to the high variability of each individual's sensitivity to nighttime noise, uncertain factors related to nighttime construction activity such as number of peak noise level occurrences, and lack of an established or adopted threshold designating acceptable occurrences of awakenings, the estimated area for awakenings presented in this analysis represents the City's best effort to disclose the potential sleep

<sup>64</sup> Acoustical Society of America, 2018. Rationale for Withdrawing ANSI/ASA S12.9-2008/Part 6. Annex 3. July 22, 2018.

<sup>65</sup> United States Environmental Protection Agency, Protective Noise Levels, 1978, p.11

disturbance effects of nighttime construction, but do not represent predictions of sleep awakenings for any specific location or population.

There are no established thresholds with regard to an acceptable level of short-term sleep disturbance. While exposure to high levels of noise during sleep can result in physiological responses, it is not possible to predict such effects in any particular population. As such, due to the lack of established thresholds and noise levels that do not exceed the threshold of pain and hearing damage, construction activities from the proposed Project would not result in adverse health effects related to pain and hearing loss and are not considered significant for this reason.

### **Off-Site Construction Traffic**

Construction traffic would generate noise along access routes to and from the proposed Project's construction areas. Construction activities would require the movement of heavy equipment throughout the Project area during respective construction phases and for each specialized construction activity (e.g., demolition, grading). Construction staging, parking and equipment storage areas will be on-site within the proposed fenced in yards or within each phasing area.

Delivery of construction materials would occur during the night shift, as would most lane closures. Construction activities during the day shift would primarily consist of work that could proceed without requiring lane closures or significant 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.

Construction employee parking would be provided within the construction areas and may also serve as temporary parking for construction personnel. As identified in the CCP, construction activities would be required to be conducted in conformance with the Parking Management Plan which states 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 area to the location where parking has been removed.

Designated delivery and haul routes would be established for the proposed Project consistent with the City's General Plan roadway designations and the haul routes currently used for local projects. As shown in **Figure 3.0-35: Proposed Construction Staging Areas and Haul Routes**, the primary delivery and haul routes proposed during construction of the proposed Project would utilize Florence Avenue, Manchester Boulevard, Prairie Avenue, and Century Boulevard, which have been designated by the City as appropriate

#### 4.10 Noise

for heavy truck use.<sup>66</sup> These routes would convey materials to and from regional routes, including the I-405 (Glen Anderson Freeway) and I-405 (San Diego Freeway).

The construction contractor would be required to utilize the haul routes and overload/oversized vehicle routes reviewed and approved by the City. As identified in the CCP, truck deliveries of bulk materials such as aggregate, bulk cement, dirt, etc. to the project site, and hauling of material from the project site, shall be scheduled during off-peak hours to avoid the peak commuter traffic periods on designated haul routes. For dirt, aggregate, bulk cement, and all other materials and equipment, truck deliveries would be on designated routes only (freeways and non-residential streets).

As shown in the Construction Phasing Narrative, a variety of heavy trucks will travel to and from the proposed Project during various phases of construction. The total trucks per phase is shown in **Table 4.10-4** above. The proposed Project is expected to generate a maximum of approximately 32 trips per day which includes both on-road on- and off-site equipment.

Although it is unlikely that all Project construction related heavy-duty construction trucks would travel along the same haul route, due to the uncertainty of the route trucks would take it has been conservatively assumed that the maximum anticipated number of heavy-duty construction trucks could potentially travel along the same route.

Traffic volume data was provided for multiple segments along each roadway, resulting in multiple different daily volumes. The lowest adjusted baseline average daily traffic (ADTs) volumes along West Century Boulevard, Manchester Boulevard, South Prairie Avenue and Florence Avenue are 33,189 trips, 18,821 trips, 22,089 trips, and 16,835 trips respectively, (refer to **Appendix N.2-1**) and the highest adjusted baselines volumes along West Century Boulevard, Manchester Boulevard, South Prairie Avenue and Florence Avenue are 50,609 trips, 36,748 trips, 38,953 trips, and 40,740 trips respectively.<sup>67</sup>

The sound power from one heavy-duty truck is greater than the sound power from one passenger vehicle (i.e., car). According to Caltrans, the noise levels from one heavy-duty truck at a speed of 35 miles per hour is equivalent to 19 passenger vehicles traveling at a speed of 35 miles per hour. Applying this multiplier to a maximum of approximately 32 trips per day, construction would generate a potential maximum sound power equivalency of up to 608 passenger vehicle trips per day. Additionally, the maximum workforce estimate range between 210 – 240 persons during Phase 4 and 5, as such resulting in 848 passenger trips per day.

<sup>66</sup> City of Inglewood, Municipal Code, Section 3-95, Truck Routes Established.  
[https://www.qcode.us/codes/inglewood/view.php?topic=3-3-3\\_85&frames=on](https://www.qcode.us/codes/inglewood/view.php?topic=3-3-3_85&frames=on)  
<sup>67</sup> Traffic data provided in the Transportation Study available in **Appendix O**.

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According to FHWA, assuming all other factors remain the same, it takes a doubling of traffic volumes (100 percent increase) in order to increase traffic noise levels by 3 dBA.<sup>68</sup> As compared to adjusted baseline average daily traffic volumes along the roadways mentioned above, the sound power generated by the maximum anticipated number of construction trucks would not be equivalent or greater to a doubling of both the minimum and maximum ADT along West Century Boulevard, Manchester Boulevard or South Prairie Avenue and therefore would not result in a 5 dBA (Leq-1hour) increase along those roadways.

Therefore, noise impacts from off-site construction traffic from trucks would be less than significant.

#### **Operation**

##### **Road Traffic Noise**

As the City transforms into a major regional activity center, the ITC Project is designed to meet the City's goals and objectives related to reducing the City's traffic congestion and alleviating growing demand on the existing roadway network by encouraging and providing the use of intermodal transportation systems. Thus, the Project is intended to reduce vehicle trips and roadway noise levels, resulting in negligible increases in the roadway network as discussed below.

##### **Adjusted Baseline Conditions During Typical Non-Event Weekdays With and Without ITC Project**

**Appendix N.2-1** and **4.10.2-2** illustrates the change in daytime (7:00 AM to 10:00 PM) and nighttime (10:00 PM to 7:00 AM) noise levels for the Adjusted Baseline Conditions during typical Non-Event Weekday with ITC Project traffic noise levels in detail. The difference in traffic noise between Adjusted Baseline Without ITC Project and Adjusted Baseline With ITC Project represents the increase (or decrease) in noise attributable to Project-related traffic area. As shown, roadway levels would result in a decrease in noise due to removal and redistribution of trips as a result of the Project. Therefore, the roadway noise level during the daytime or nighttime periods would not exceed the threshold of significance of an increase in noise level of 3 dBA Leq to or within the "normally unacceptable" or "clearly unacceptable" land use compatibility categories or result in an increase of 10 dBA when noise levels remain within acceptable limits. Impacts of the proposed Project related to traffic generated noise for the Adjusted Baseline Conditions during typical non-event weekdays with ITC Project would be less than significant.

##### **Opening Year (2027) Conditions With NFL Event With and Without ITC Project**

**Appendix N.2-3** and **4.10.2-4** compares the daytime and nighttime noise levels from Opening Year (2027) Conditions With NFL Event Without ITC Project to the Opening Year (2027) Conditions With NFL Event With ITC Project. As shown, roadway levels would result in a decrease in noise due to removal and redistribution of trips as a result of the Project. Therefore, the roadway noise level during the daytime or

<sup>68</sup> Federal Highway Administration, FHWA Highway Traffic Noise Prediction Model, December 1978,  
<https://ia801807.us.archive.org/3/items/fhwahighwaytraff00barr/fhwahighwaytraff00barr.pdf>.

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nighttime periods would not exceed the threshold of significance of an increase in noise level of 3 dBA Leq to or within the “normally unacceptable” or “clearly unacceptable” land use compatibility categories or result in an increase of 10 dBA when noise levels remain within acceptable limits. Impacts of the proposed Project related to traffic generated noise for the Opening Year (2027) Conditions with NFL Event With ITC Project would be less than significant.

##### Future Horizon Year (2045) With NFL Event With and Without ITC Project

**Appendix N.2-5 and 4.10.2-6** compares the daytime and nighttime noise levels from traffic generated by the Future Horizon Year (2045) With NFL Event Without ITC Project to the Future Horizon Year (2045) With NFL Event With Project conditions. As shown, roadway levels would result in a decrease in noise due to removal and redistribution of trips as a result of the Project. Therefore, the roadway noise level during the daytime or nighttime periods would not exceed the threshold of significance of an increase in noise level of 3 dBA Leq to or within the “normally unacceptable” or “clearly unacceptable” land use compatibility categories or result in an increase of 10 dBA when noise levels remain within acceptable limits. Impacts of the proposed Project related to traffic generated noise for the Future Horizon Year (2045) With NFL Event without and with the ITC Project would be less than significant.

##### ATS Train Transit Noise

As mentioned previously, for analysis purposes it is assumed that the proposed Project would either utilize large, automated monorail technologies or rubber-tire vehicles operating along a fixed guideway. **Table 4.10-23: ATS Trains Exterior Noise Levels** below provides the predicted noise levels of both the rubber-tired ATS train and monorail.

It is important to note, the Project would be required to implement **PDF NOISE-3**, which requires the ATS train to 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 the any barriers along the guideway designed to reduce noise shall be subject to the limited noted in **Table 4.10-9** above. Therefore, whether the Project implements steel-wheel rail technology or operates with a cable or pulley system, it would comply with maximum noise level requirements

##### Rubber-tired ATS Train Noise

As shown in **Table 4.10-23**, when compared to ambient conditions, daytime noise level increases from the rubber-tired ATS trains would range from 0.1 dBA Leq (Lday) at various sites to a high of 0.2 dBA Leq (Lday) at Site 1 (Residential uses to the west of N. Locust Street including the Holy Faith Episcopal Church, commercial uses to the east of N. Locust Street). Additionally, nighttime noise level increases would range from a low of 0.1 dBA Leq (Lnight) at Site K (commercial uses along Regent Street) to a high of 0.9 dBA Leq

#### 4.10 Noise

(Lnight) at Site 1. It is important to note that the majority of the noise monitoring locations identified are not predicted to experience any increase resulting from operation of the rubber-tired ATS trains. As such, operational noise levels would not result in increases of 3 dBA to or within the “normally unacceptable” or “clearly unacceptable” compatibility category for land uses or result in an increase of 10 dBA or greater when noise levels remain within acceptable limits.

##### Monorail Noise

As shown in **Table 4.10-23**, when compared to ambient conditions, daytime noise level increases from the monorail technology would range from a low of 0.1 dBA Leq (Lday) at various sites to a high of 0.5 dBA Leq (Lday) at the residential uses to the east of the Market Street/Florence Avenue Station (Site 1). Additionally, nighttime noise level increases would range from a low of 0.1 dBA Leq (Lnight) at various sites to a high of 1.8 dBA Leq (Lnight) at Site 1. However, similar to the rubber-tired ATS trains, the majority of locations monitored are not predicted to experience any increases resulting from operation of the monorail technology trains. As such, operational noise levels from the monorail technology would not result in increases of 3 dBA Leq to or within the “normally unacceptable” or “clearly unacceptable” compatibility category for land uses or result in an increase of 10 dBA or greater when noise levels remain within acceptable limits.

**Table 4.10-23**  
**ATS Trains Exterior Noise Levels**

Site ID	Land Use	Existing Ambient		Train Type	Modeled Guideway Noise Levels		Future Ambient Plus Proposed ATS Trains		Increase in Noise		Significant Impact?
		Daytime	Nighttime		Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime	
<b>Market Street Segment</b>											
Site 1	Residential	61.9	54.6	Rubber Tired	48.9	48.1	62.1	55.5	+0.2	+0.9	No
				Monorail	52.7	51.8	62.4	56.4	+0.5	+1.8	No
Site A	Residential	64.1	57.8	Rubber Tired	37.6	36.7	64.1	57.8	0.0	0.0	No
				Monorail	48.7	47.9	64.2	58.2	+0.1	+0.4	No
Site K	Public	67.5	63.4	Rubber Tired	49.3	48.5	67.6	63.5	+0.1	+0.1	No
				Monorail	54.8	54.0	67.7	63.9	+0.2	+0.5	No
<b>Manchester Boulevard Segment</b>											
Site 2	Residential	64.1	59.4	Rubber Tired	37.6	36.7	64.1	59.4	0.0	0.0	No
				Monorail	47.6	46.8	64.2	59.6	+0.1	+0.2	No
Site B	Educational	73.5	70.5	Rubber Tired	38.6	37.7	73.5	70.5	0.0	0.0	No
				Monorail	48.0	47.1	73.5	70.5	0.0	0.0	No
Site I	Residential	68.0	58.5	Rubber Tired	38.6	37.7	68.0	58.5	0.0	0.0	No
				Monorail	45.9	45.0	68.0	58.7	0.0	+0.2	No
Site J	Commercial/Mixed Use	73.6	69.1	Rubber Tired	34.0	33.1	73.6	69.1	0.0	0.0	No
				Monorail	47.2	46.3	73.6	69.1	0.0	0.0	No
Site L	Residential	74.0	72.8	Rubber Tired	33.9	33.1	74.0	72.8	0.0	0.0	No
				Monorail	40.1	39.3	74.0	72.8	0.0	0.0	No

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**Prairie Avenue Segment**

Site 3	Educational/Residential	71.2	66.0	Rubber Tired	40.4	39.6	71.2	66.0	0.0	0.0	No
				Monorail	48.6	47.7	71.2	66.1	0.0	+0.1	No
Site 4	Residential	77.2	71.6	Rubber Tired	35.1	34.1	77.2	71.6	0.0	0.0	No
				Monorail	46.0	45.1	77.2	71.6	0.0	0.0	No
Site C	Place of Worship/Lodging	76.7	70.6	Rubber Tired	35.0	34.1	76.7	70.6	0.0	0.0	No
				Monorail	46.3	45.4	76.7	70.6	0.0	0.0	No
Site E	Lodging	72.6	66.2	Rubber Tired	27.5	26.6	72.6	66.2	0.0	0.0	No
				Monorail	39.6	38.7	72.6	66.2	0.0	0.0	No
Site F	Residential	68.8	59.9	Rubber Tired	37.8	37.0	68.8	59.9	0.0	0.0	No
				Monorail	46.3	45.4	68.8	60.1	0.0	+0.2	No
Site G	Residential	67.3	61.5	Rubber Tired	40.9	40.0	67.3	61.5	0.0	0.0	No
				Monorail	47.9	47.1	67.3	61.7	0.0	+0.2	No
Site H	Educational/Residential	67.6	56.6	Rubber Tired	41.5	40.6	67.6	56.7	0.0	+0.1	No
				Monorail	48.1	47.2	67.6	57.0	0.0	+0.4	No
Site M	Residential	74.9	67.9	Rubber Tired	31.6	30.8	74.9	67.9	0.0	0.0	No
				Monorail	38.3	37.5	74.9	67.9	0.0	0.0	No
Site 5	Lodging	73.3	70.0	Rubber Tired	31.3	30.4	73.3	70.0	0.0	0.0	No
				Monorail	42.1	41.3	73.3	70.0	0.0	0.0	No
Site D	Lodging	76.2	67.0	Rubber Tired	30.9	30.0	76.2	67.0	0.0	0.0	No
				Monorail	39.0	38.2	76.2	67.0	0.0	0.0	No

Source: Refer to Appendix N.6-2 for Operational Noise for Modeled Guideway System Worksheets.

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### Stationary Source Noise

#### MSF Site Operations

The proposed MSF facility will be located on a site containing an existing retail commercial building at 500 E. Manchester Boulevard containing a Vons grocery store, a gym, a bank branch, and a gas station operated by Vons. The MSF is proposed on the eastern portion of this site and a new replacement Vons store, which would include amenities similar to the existing store will be built on the corner of Manchester Boulevard and Hillcrest Boulevard. A detailed description of the MSF is provided in **Section 3.0, 3.5.4: Maintenance and Storage Facility (MSF)**.

The MSF is a large facility (approximately 75,000 SF), spread out over considerable area with various noise levels and would be sized to accommodate the ATS train rolling stock and operating equipment. The MSF building 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. The maintenance level will contain mezzanine administrative office space. The ground level would include multiple rows of columns and support beams for structural support.

The MSF site is bordered on three sides by residential and commercial uses across E. Hillcrest Boulevard, E. Spruce Avenue and E. Nutwood Street. In addition, there are commercial and residential uses to the east/northeast across Manchester Boulevard. Using the general assessment of FTA's Noise and Vibration Impacts Assessment Manual, reference noise levels for activities that would be associated with the MSF include 20 train movements during the peak hour for a typical maintenance and operations facility. The SoundPLAN noise propagation model was used to calculate area noise sources within the MSF and Vons site. The model accounts for multiple receiver points, resulting in varying impacts due to distance of each point and the location of any intervening existing structures that serve as shields or noise barriers. As shown in **Table 4.10-24: Modeled Operational Noise Levels**, operational noise level increases during the daytime would range from no change at the majority of the identified receptors listed below to a high of 2.1 dBA Leq (Lday) at Site I (residential uses along Spruce Ave across from the MSF). Taking into account the ambient environment, exterior noise levels during the daytime period at Site I would be 70.1 dBA. Increases in daytime noise levels would not exceed the 3 dBA Leq to or within the "normally unacceptable" or "clearly unacceptable" land use compatibility categories or result in an increase of 10 dBA or greater when noise levels remain within acceptable limits. Additionally, nighttime noise level increases would range from no change at the majority of the identified receptors listed below to a high of 3.9 dBA Leq (Lnight) at Site I. Taking into account the ambient environment, exterior noise levels during the nighttime period at Site I would be 62.4 dBA. Although nighttime noise levels would increase by more than 3 dBA Leq, nighttime noise levels would not result in an exterior environment that exceeds the "normally

unacceptable" or "clearly unacceptable" land use compatibility categories or result in an increase of 10 dBA or greater when noise levels remain within acceptable limits.

The MSF will be designed in accordance with the ITC Design Standards and Guidelines (Design Guidelines) which address the massing, façade, materials, colors, roof, and lighting for this facility, how the MSF will engage with the pedestrian and vehicular circulation around it, and sustainability features. Building elements would include screens to shield all exterior equipment including equipment at the rooftop and ground level, so that it is not visible from the street or accessible areas of adjacent properties.

Impacts related to stationary noise sources from the MSF would be less than significant.

**Table 4.10-24  
Modeled Operational Noise Levels**

Receptor	Land Use	Time Period	Ambient Noise	MSF Operational Noise, Leq	MSF Operational Noise plus Ambient, leq dBA	Increase Over Ambient, Leq	Significant Impact?
<b>Market Street Segment</b>							
Site 1	Residential	Daytime	61.9	39.1	61.9	0.0	No
		Nighttime	54.6	33.5	54.6	0.0	No
Site A	Residential	Daytime	64.1	40.9	64.1	0.0	No
		Nighttime	57.8	35.2	57.8	0.0	No
Site K	Public	Daytime	67.5	38.3	67.5	0.0	No
		Nighttime	63.4	32.7	63.4	0.0	No
<b>Manchester Boulevard Segment</b>							
Site 2	Residential	Daytime	67.5	56.9	67.9	+0.4	No
		Nighttime	64.1	51.3	64.3	+0.2	No
Site B	Educational	Daytime	73.5	45.2	73.5	0.0	No
		Nighttime	70.5	39.5	70.5	0.0	No
Site I	Residential	Daytime	68.0	65.9	70.1	+2.1	No
		Nighttime	58.5	60.2	62.4	+3.9	No
Site J	Commercial/Mixed Use	Daytime	73.6	42.7	73.6	0.0	No
		Nighttime	69.1	37.1	69.1	0.0	No
Site L	Residential	Daytime	74.0	39.9	74.0	0.0	No
		Nighttime	72.8	34.2	72.8	0.0	No
<b>Prairie Avenue Segment</b>							
Site 3	Educational/Residential	Daytime	71.2	47.3	71.2	0.0	No
		Nighttime	66.0	41.6	66.0	0.0	No
Site 4	Residential	Daytime	77.2	32.3	77.2	0.0	No

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Receptor	Land Use	Time Period	Ambient Noise	MSF Operational Noise, Leq	MSF Operational Noise plus Ambient, leq dBA	Increase Over Ambient, Leq	Significant Impact?
Site C	Place of Worship/Lodging	Nighttime	71.6	26.6	71.6	0.0	No
		Daytime	76.7	34.3	76.7	0.0	No
Site E	Lodging	Nighttime	70.6	28.6	70.6	0.0	No
		Daytime	72.6	28.2	72.6	0.0	No
Site F	Residential	Nighttime	66.2	22.6	66.2	0.0	No
		Daytime	68.8	37.6	68.8	0.0	No
Site G	Residential	Nighttime	59.9	32.0	59.9	0.0	No
		Daytime	67.3	40.2	67.3	0.0	No
Site H	Educational/Residential	Nighttime	61.5	34.5	61.5	0.0	No
		Daytime	67.6	44.9	67.6	0.0	No
Site M	Residential	Nighttime	56.6	39.2	56.7	+0.1	No
		Daytime	74.9	36.4	74.9	0.0	No
Site D	Lodging	Nighttime	67.9	30.8	67.9	0.0	No
		Daytime	76.2	36.5	76.2	0.0	No
Site 5	Lodging	Nighttime	67.0	30.8	67.0	0.0	No
		Daytime	73.3	35.4	73.3	0.0	No
		Nighttime	70.0	29.7	70.0	0.0	No

Source: Refer to Appendix N-5-J for MSF Stationary Source Worksheets.

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### **PDS Substation Site Operations**

The proposed Project will include two PDS substations. The identified PDS substation locations are the proposed MSF site and the Prairie Avenue/Hardy Street station. Each PDS substation includes equipment to transform the medium- to high-voltage power feed provided from the power companies to the required 750-volt direct current (VDC) needed to power the vehicles and other ancillary equipment. A description of the PDS substations is provided in **Section 3.0, 3.5.5: Power Distribution System Substations**.

Noise from transformers and similar equipment at substations is usually a low-frequency (60 Hz) humming sound. Noise from fans and ventilation equipment at substation sites can also contribute to this source. Transformer noise will “transmit” and attenuate at different rates depending on the transformer size, voltage rating, and design. The substation would be the source of noise from what is termed corona discharge. Noise from corona discharge and similar electrical phenomena associated with high voltage transmission lines is heard as a cracking or hissing sound, which commonly varies with the humidity. While distinctive at a short distance, this noise is typically only about 40 to 50 dBA or less and would not be loud enough to cause a significant increase in noise levels at both the proposed MSF site and the Prairie Avenue/Hardy Street station. When taking into account the noise from the transmission line ranging from 40 to 50 dBA, this results in a maximum increase of 0.1 dBA Leq, which is technically considered not perceivable. With the concurrent operation of noise generated from the proposed MSF site and the Prairie Avenue/Hardy Street station, the noise levels generated by the transformers would be negligible. Additionally, as described previously, implementation of PDF NOISE-1 would require stationary noise source generated from mechanical equipment to be enclosed within a shed or barrier that would further reduce noise levels. Thus, the off-site PDS substations would result in a less than significant noise impact.

### **Backup Generators**

To assure the ability to allow ATS trains to reach the nearest stations to offload riders in the event of loss of electrical supply, each PDS substation will be equipped with backup power generators. The proposed Project would include up to two stationary standby generators, one at each of the two PDS substation sites, with an estimated total capacity rated at approximately 4,000 kilowatts (kW) to provide emergency power primarily for ATS train operation, lighting, and other emergency systems.

Community response to noise and vibration correlates with the frequency of events and, intuitively, more frequent events of low noise and vibration levels may evoke the same responses as fewer high vibration level events. This effect is accounted for in the ground-borne noise and vibration impact criteria by characterizing projects by frequency of events. According to the FTA *Transit Noise and Vibration Impact Assessment Manual*, frequent events are defined as more than 70 events per day and infrequent events are defined as fewer than 30 events per day. For maintenance purposes, each standby generator would be tested and operated for 2 hours per day during 24 days per year (twice a month) for a total of not more

than 50 hours per year. Each standby generator would be tested during different days; if needed for emergency operation, both generators would operate for up to 2 hours each and operation could occur simultaneously.

Reference noise levels for emergency generators from the SoundPLAN source library range from 60 dB to 75 dB at 10 meters (32.8 feet) from the source. Assuming the maximum emergency generator noise level of 75 dB, sensitive receptors within this distance without the use of shields or barriers would exceed the upper limit for the Normally Acceptable noise exposure to residential residences of 70 dBA. As mentioned previously, based on conventional standard point source noise-distance attenuation factors, noise levels would be reduced by a factor of 4.5 to 6.0 dBA for each doubling distance. Assuming the lowest end of the attenuation factor of 4.5 dBA per doubling distance, emergency generator noise levels within 100 feet would be reduced to 67.6 dBA, below the normally acceptable noise exposure for residential residences. Additionally, as described in the Design Guidelines, screens will be provided to shield all exterior equipment, so that it is not visible from the street or accessible areas of adjacent properties. These screens would act as barrier to further reduce noise levels from the emergency generator. A barrier can achieve a 5-dB noise level reduction when it is tall enough to break the line-of-sight to the receiver. As such, due to the infrequent use of the generator and the use of barriers for stationary noise sources, a less-than-significant noise impact is anticipated for the use of emergency generators.

### **Station Operation Noise**

The proposed Project includes three stations: at Market Street/Florence Avenue, Prairie Avenue/Manchester Boulevard and Prairie Avenue/Hardy Street. All platforms would be elevated at least 16 feet above ground level and would include three levels (street level, mezzanine level, and platform level); a typical station design is shown in **Figure 3.0-5**. Additional details of the stations are discussed in **Section 3.0, 3.5.3: Stations**. All three stations would include elevated passenger walkways with a height up to 65 feet measured from the existing grade to top of structure.

Moderate noise impacts from ATS train or monorail passbys have been analyzed along each of the guideway segments (Market Street, Manchester Boulevard and Prairie Avenue) including noise from the trains/monorails entering and exiting stations. The exterior noise level generated by the ATS trains, with all contributing noise sources in operation, would conform to **PDF NOISE-3** which provides noise levels specified in Section 2.2.1, Exterior Airborne Noise, ASCE 21-05 and not exceed the exterior noise standards set forth therein.<sup>69</sup> As such, the guideway would be designed to meet these noise levels and have noise

<sup>69</sup> American Society of Civil Engineers, Automated People Mover Standards - Part 2 Section 2.2.1, Exterior Airborne Noise, ASCE 21-05.

limiting barriers to limit train noise as noted in **Table 4.10-9** above as appropriate. The FTA noise limits for trains entering or leaving stations is 76 dBA.<sup>70</sup>

Furthermore, as shown in **Table 4.10-23** above, operation of the proposed Project would result in noise level increases from a low of 0.1 dBA Leq to a high of 1.8 dBA Leq for the monorail technology, which results in a higher increase when compared to the rubber-tired ATS trains. Additionally, exterior noise levels from the ATS trains would range from 37.6 dBA Leq (Lday) at Site A (commercial uses along Queen Street and Market Street) to a high of 54.8 dBA Leq (Lday) at Site K (residential uses along N. Locust Street). Additionally, nighttime noise levels from the ATS trains at the Market Street Station would range from a low of 36.7 dBA Leq (Lnight) at Site A to a high of 54.0 dBA Leq (Lnight) at Site K.

Noise from passengers that would use the elevated passenger walkways at all three stations would not be a substantial noise source in that the crossover would be elevated from the ground floor and removed from any adjacent buildings. In addition, the noise would be muffled by existing background noise from vehicle traffic from the surrounding streets.

The anticipated noise increase from operation of the stations would not result in an increase in noise level of 3 dBA to or within the “normally unacceptable” or “clearly unacceptable” land use compatibility categories or result in an increase of 10 dBA or greater when noise levels remain within acceptable limits.

#### **Composite Traffic and Proposed Project Noise**

As discussed previously, implementation of the proposed Project would result in changes to existing road traffic noise, transit noise, and noise from the MSF site. The combined noise of these Project noise sources is analyzed below

#### **Operation**

As discussed, and shown in **Appendix N.2-6**, operation of the proposed Project would not result in significant impacts related to noise from roadway traffic levels, resulting in maximum increases of 0.1 dBA; in some areas, noise would actually decrease. Additionally, as shown in **Table 4.10-23**, operation of the proposed Project would result in noise level increases from a low of 0.1 dBA Leq to a high of 1.8 dBA Leq for the monorail technologies, which results in a higher increase when compared to the rubber-tired ATS trains.

As shown in **Table 4.10-24**, anticipated noise levels from stationary sources from the proposed MSF would range from no increase to a high of 3.9 dBA Leq. Taking into account the ambient environment, exterior noise levels during the nighttime period at Site I would be 62.4 dBA Leq (Lnight). Although nighttime noise

<sup>70</sup> American Society of Civil Engineers, Automated People Mover Standards - Part 2 Section 2.2.1, Exterior Airborne Noise, ASCE 21-05.

levels would increase by more than 3 dBA Leq, nighttime noise levels would not result in an exterior environment that exceeds the “normally unacceptable” or “clearly unacceptable” land use compatibility categories or result in an increase of 10 dBA or greater when noise levels remain within acceptable limits.

**Table 4.10-25: Composite Operational Noise (Roadway, ATS Trains, and Stationary Sources)** presents the composite operational noise levels at each of the sensitive receptors. The impacts are indicative of the impacts that would be experienced taking into account the change in roadway noise levels, operation of the ATS trains and stationary noise from the proposed MSF site. As a result, impacts within each receptor group may vary depending on the distance of each receiver point within the specific receptor group and the location of any shielding or barriers.

As shown in **Table 4.10-25**, maximum composite noise level increases above ambient during the daytime period range from a low of 0.1 dBA Leq (Lday) to a high of 4.5 dBA Leq (Lday). Additionally, maximum composite noise level increases above ambient during the nighttime period from a low of 0.2 dBA Leq (Lnight) to a high of 5.8 dBA Leq (Lnight). Although exterior noise levels would increase by more than 3 dBA Leq during both the daytime and nighttime period, increases would not cause noise levels to be within the “normally unacceptable” or “clearly unacceptable” land use compatibility ranges for residential uses or result in an increase of 10 dBA or greater when noise levels remain within acceptable limits. Composite noise levels impacts would be less than significant.

Table 4.10-25  
Composite Operational Noise (Roadway, ATS Trains, and Stationary Sources)

Sensitive Receptor ID	Land Use	Time Period	Future Long-Term (2045) With Project Roadway Noise Levels <sup>1</sup>	Maximum Noise Levels at Guideway <sup>2</sup>	Maximum Stationary Noise Levels <sup>3</sup>	Future Roadway plus Maximum Noise at Guideway plus Stationary	Increase in Composite Noise <sup>3</sup>	Significant Impact?
<b>Market Street Segment</b>								
Site 1	Residential	Daytime	58.7	52.7	39.1	59.7	+1.0	No
		Nighttime	51.2	51.8	33.5	54.6	+3.8	No
Site A	Residential	Daytime	60.9	48.7	40.9	61.2	+0.3	No
		Nighttime	53.3	47.9	35.2	54.5	+1.2	No
Site K	Public	Daytime	67.3	54.8	38.3	67.5	+0.2	No
		Nighttime	59.8	54.0	32.7	60.8	+1.0	No
<b>Manchester Boulevard Segment</b>								
Site 2	Residential	Daytime	70.2	47.6	56.9	70.4	+0.2	No
		Nighttime	62.7	46.8	51.3	63.1	+0.4	No
Site B	Educational	Daytime	70.2	48.0	45.2	70.2	0.0	No
		Nighttime	62.7	47.1	39.5	62.8	+0.1	No
Site I	Residential	Daytime	63.4	45.9	65.9	67.9	+4.5	No
		Nighttime	55.8	45.0	60.2	61.6	+5.8	No
Site J	Commercial/Mixed Use	Daytime	68.8	47.2	42.7	68.8	0.0	No
		Nighttime	61.3	46.3	37.1	61.5	+0.2	No
Site L	Residential	Daytime	73.0	40.1	39.9	73.0	0.0	No
		Nighttime	65.5	39.3	34.2	65.5	0.0	No
<b>Prairie Avenue Segment</b>								
Site 3	Educational/Residential	Daytime	71.9	48.6	47.3	72.0	+0.1	No

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Sensitive Receptor ID	Land Use	Time Period	Future Long-Term (2045) With Project Roadway Noise Levels <sup>1</sup>	Maximum Noise Levels at Guideway <sup>2</sup>	Maximum Stationary Noise Levels <sup>3</sup>	Future Roadway plus Maximum Noise at Guideway plus Stationary	Increase in Composite Noise <sup>3</sup>	Significant Impact?
Site 4	Residential	Daytime	64.3	47.7	41.6	64.4	+0.1	No
		Nighttime	71.7	46.0	32.3	71.7	0.0	No
Site C	Place of Worship/Lodging	Daytime	64.2	45.1	26.6	64.3	+0.1	No
		Nighttime	72.1	46.3	34.3	72.1	0.0	No
Site E	Lodging	Daytime	64.5	45.4	28.6	64.6	+0.1	No
		Nighttime	73.0	39.6	28.2	73.0	0.0	No
Site F	Residential	Daytime	65.5	38.7	22.6	65.5	0.0	No
		Nighttime	59.7	46.3	37.6	59.9	+0.2	No
Site G	Residential	Daytime	52.2	45.4	32.0	53.1	+0.9	No
		Nighttime	65.3	47.9	40.2	65.4	+0.1	No
Site H	Educational/Residential	Daytime	57.8	47.1	34.5	58.2	+0.4	No
		Nighttime	64.8	48.1	44.9	64.9	+0.1	No
Site M	Residential	Daytime	57.3	47.2	39.2	57.8	+0.5	No
		Nighttime	71.3	38.3	36.4	71.3	0.0	No
Site D	Lodging	Daytime	63.8	37.5	30.8	63.8	0.0	No
		Nighttime	72.1	39.0	36.5	72.1	0.0	No
Site 5	Lodging	Daytime	64.6	38.2	30.8	64.6	0.0	No
		Nighttime	73.6	42.1	35.4	73.6	0.0	No
Site 5	Lodging	Daytime	66.1	41.3	29.7	66.1	0.0	No
		Nighttime	66.1	41.3	29.7	66.1	0.0	No

Notes: <sup>1</sup> Refer to Table 4.10-20 for Roadway Noise Levels

<sup>2</sup> Refer to Table 4.10-23 for Monorail Guideway System operational noise levels.

<sup>3</sup> Refer to Table 4.10-25 for MSF Operational Noise Levels

<sup>4</sup> Logarithmic increase = Roadway Noise + Guideway Noise + Stationary MSF Noise

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### Mitigation Measures

Noise impacts from construction and operation of the Project would be less than significant and do not require any mitigation.

**Impact NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?**

### Construction

Construction activities can generate varying degrees of ground vibration, depending on the construction phase (e.g., site preparation, grading, etc.) and the type of construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located near the construction site often varies depending on soil type, ground strata, and construction characteristics of the receptor buildings. The results from vibration can range from no perceptible effects at the lowest vibration levels to low rumbling sounds and perceptible vibration at moderate levels.

Ground-borne vibration impacts due to proposed Project construction activities were evaluated by identifying potential vibration sources (i.e., construction equipment), estimating the vibration levels at potentially affected receptors, and comparing the proposed Project's vibration levels to the applicable vibration significance thresholds.

Vibration levels were calculated based on the FTA published standard vibration velocities for various construction equipment operations.<sup>71</sup> Vibration levels with regard to potential building damage are evaluated at the nearest off-site buildings to the Project area, whereas the potential for human annoyance associated with construction-related vibration are evaluated at the identified receptor locations. In addition, vibration impacts, in accordance with FTA and Caltrans guidance, are evaluated based on the maximum peak vibration levels generated by each type of construction equipment. This differs from the analysis of noise impacts which is based on the average/equivalent (Leq) levels, which are dependent on the total number of construction equipment operating during the analysis period (i.e., 1 hour).

### Construction Related Vibration Impacts from On-Site Activities

The proposed Project will involve the use of heavy equipment as discussed in the Construction Phasing Narrative (see **Appendix 3.0.4**). The anticipated construction equipment for on- and off site-construction activities and is shown in **Table 4.10-4**.

<sup>71</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, FTA Report No. 0123, September 2018, accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf)

**Off-Road On-Site Equipment:** Off-road construction equipment includes dozers, loaders, sweepers, and other heavy-duty construction equipment that is not licensed for travel on public highways.

**On-Road On-Site Equipment:** On-road on-site equipment includes shuttle vans transporting construction employees to and from the site(s), on-site pick-up trucks, crew vans, water trucks, dump trucks, haul trucks and other on road-road vehicles licensed to travel on public roadways.

**Table 4.10-26: Proposed Project Construction Related Vibration Impacts – Building Damage** presents the construction vibration impacts associated with construction in terms of building damage. As shown in **Table 4.10-26**, the forecasted vibration levels due to construction activities would exceed the building damage significance threshold of 0.2 PPV inches per second (ips) at the locations described below. These impacts are primarily caused by impact pile drivers located within 55 feet of the nearest receptor.

### Market Street and Market Street/Florence Avenue Station

- **Site 1** (Residential uses to the west of N. Locust Street including the Holy Faith Episcopal Church, commercial uses to the east of N. Locust Street) with an estimated vibration velocity level at the nearest off-site structures of 0.267 PPV ips;
- **Site A** (Commercial uses along E. Queen Street) with an estimated vibration velocity level at the nearest off-site structures of 0.318 PPV ips; and
- **Site K** (Commercial uses along E. Regent Street) with an estimated vibration velocity level at the nearest off-site structures of 0.228 PPV ips.

### Manchester Boulevard and MSF Site

- **Site B** (Residential uses on the northern portion of E. Manchester Boulevard, commercial uses on the southern portion of E. Manchester Boulevard) with an estimated vibration velocity level at the nearest off-site structures of 0.318 PPV ips; and
- **Site I** (Residential uses on the eastern portion of E. Spruce Avenue, commercial uses on the western portion of E. Spruce Avenue) with an estimated vibration velocity level at the nearest off-site structures of 0.228 PPV ips; and

### Prairie Avenue and Prairie Avenue/Manchester Boulevard and Prairie Avenue/Hardy Street Stations

- **Site 4** (Mixed-use residential along west side of Prairie Avenue) with an estimated vibration velocity level at the nearest off-site structures of 0.490 PPV ips;
- **Site C** (SoFi Stadium to the west of Prairie Avenue, commercial and lodging uses to the east of Prairie Avenue) with an estimated vibration velocity level at the nearest off-site structures of 0.318 PPV ips

Table 4.10-26

## Proposed Project Construction Related Vibration Impacts – Building Damage

Nearest Off-Site Building Structures	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from Proposed Project Construction Equipment							Significance Threshold (PPV ips)	Significant Impacts?
	Pile Driver (impact)	Vibratory Roller	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small bulldozer		
<b>Market Street Segment</b>									
Site 1	<b>0.267</b>	0.087	0.037	0.037	0.031	0.058	0.001	0.2	Yes
Site A	<b>0.318</b>	0.104	0.044	0.044	0.038	0.069	0.001	0.2	Yes
Site K	<b>0.228</b>	0.074	0.031	0.031	0.027	0.049	0.001	0.2	Yes
<b>Manchester Boulevard Segment</b>									
Site 2	0.137	0.045	0.019	0.019	0.016	0.030	0.001	0.2	No
Site B	<b>0.318</b>	0.104	0.044	0.044	0.038	0.069	0.001	0.2	Yes
Site I	<b>0.228</b>	0.074	0.031	0.031	0.027	0.049	0.001	0.2	Yes
Site J	0.173	0.056	0.024	0.024	0.020	0.038	0.001	0.2	No
Site L	0.002	0.001	0.000	0.000	0.000	0.000	0.000	0.2	No
<b>Prairie Avenue Segment</b>									
Site 3	0.051	0.017	0.007	0.007	0.006	0.011	0.000	0.2	No
Site 4	<b>0.490</b>	0.160	0.068	0.068	0.058	0.107	0.002	0.2	Yes
Site 5	0.124	0.040	0.017	0.017	0.015	0.027	0.001	0.2	No
Site C	<b>0.318</b>	0.104	0.044	0.044	0.038	0.069	0.001	0.2	Yes
Site D	0.012	0.004	0.002	0.002	0.001	0.003	0.000	0.2	No
Site E	0.011	0.004	0.002	0.002	0.001	0.002	0.000	0.2	No
Site F	0.051	0.017	0.007	0.007	0.006	0.011	0.000	0.2	No
Site G	0.028	0.009	0.004	0.004	0.003	0.006	0.000	0.2	No
Site H	0.008	0.003	0.001	0.001	0.001	0.002	0.000	0.2	No
Site M	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.2	No

Source: US Department of Transportation, Federal Transportation Authority, Transit Noise and Vibration Impact Assessment  
Refer to **Appendix N-5** for Construction Vibration Worksheets

Note: **Boldface type** indicates noise level in exceedance of the significance threshold.

As mentioned previously, 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 **PDF NOISE-2** 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. The Construction Vibration Reduction Plan would require continuous monitoring and collection of vibration data to verify vibration levels are below the warning level PPV. In the event the regulatory levels of PPV are triggered, construction activities would halt to visually inspect sensitive buildings for damage. **PDF NOISE-2** also requires vibration-generating equipment to be located at specified distances from adjacent noise receptors. More specifically, to limit the risk of potential structural and building damage, **PDF NOISE-2** would 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. **PDF NOISE-2** would limit the number of jackhammers operating

simultaneously to one (1) piece operating within 45 feet of off-site sensitive receptors. Implementation of these construction management practices would limit the potential for impacts from construction vibration to result in building damage with adjusted distance of construction equipment. Impacts would be less than significant and below the significance threshold for building damage of 0.2 PPV IPS with implementation of **PDF NOISE-2**.

As shown in **Table 4.10-27: Proposed Project Construction Related Vibration Impacts—Human Annoyance**, without implementation of **PDF NOISE-2** the forecasted vibration levels from construction activities would exceed the human annoyance significance threshold of 72 PPV ips for various types of equipment at:

#### **Market Street and Market Street/Florence Avenue Station**

- **Site 1** (Residential uses to the west of N. Locust Street including the Holy Faith Episcopal Church, commercial uses to the east of N. Locust Street) with an estimated maximum vibration velocity level at the nearest off-site structures of 96 VdB.
- **Site A** (Commercial uses along E. Queen Street) with an estimated maximum vibration velocity level at the nearest off-site structures of 98 VdB.
- **Site K** (Commercial uses along E. Regent Street) with an estimated maximum vibration velocity level at the nearest off-site structures of 95 VdB.

#### **Manchester Boulevard and MSF Site**

- **Site 2** (Residential uses along E. Manchester Boulevard, Manchester Drive and S. Orange Avenue) with an estimated maximum vibration velocity level at the nearest off-site structures of 91 VdB.
- **Site B** (Residential uses on the northern portion of E. Manchester Boulevard, commercial uses on the southern portion of E. Manchester Boulevard) with an estimated maximum vibration velocity level at the nearest off-site structures of 98 VdB.
- **Site I** (Residential uses on the eastern portion of E. Spruce Avenue, commercial uses on the western portion of E. Spruce Avenue) with an estimated maximum vibration velocity level at the nearest off-site structures of 95 VdB.
- **Site J** (Commercial uses along E. Manchester Boulevard) with an estimated maximum vibration velocity level at the nearest off-site structures of 93 VdB.

#### **Prairie Avenue and Prairie Avenue/Manchester Boulevard and Prairie Avenue/Hardy Street Stations**

- **Site 3** (Residential uses along E. Nutwood Street, education facilities along Prairie Avenue) with an estimated maximum vibration velocity level at the nearest off-site structures of 82 VdB.

- **Site 4** (Mixed-use residential along west side of Prairie Avenue) with an estimated maximum vibration velocity level at the nearest off-site structures of 102 VdB.
- **Site 5** (Lodging uses on the southern portion of W. Century Boulevard) with an estimated maximum vibration velocity level at the nearest off-site structures of 90 VdB.
- **Site C** (SoFi Stadium to the west of Prairie Avenue, commercial and lodging uses to the east of Prairie Avenue) with an estimated maximum vibration velocity level at the nearest off-site structures of 98 VdB.
- **Site F** (Multifamily residential uses along E. Hardy Street) with an estimated maximum vibration velocity level at the nearest off-site structures of 82 VdB.
- **Site G** (Residential uses along E. Arbor Vitae Street) with an estimated maximum vibration velocity level at the nearest off-site structures of 77 VdB.

Table 4.10-27

Proposed Project Construction Related Vibration Impacts – Human Annoyance

Nearest Off-Site Building Structures	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from Proposed Project Construction Equipment							Significance Threshold (VdB)	Significant Impacts?
	Pile Driver (impact)	Vibratory Roller	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small bulldozer		
<b>Market Street Segment</b>									
Site 1	<b>96</b>	<b>87</b>	<b>79</b>	<b>79</b>	<b>78</b>	<b>83</b>	50	72	Yes
Site A	<b>98</b>	<b>88</b>	<b>81</b>	<b>81</b>	<b>79</b>	<b>85</b>	51	72	Yes
Site K	<b>95</b>	<b>85</b>	<b>78</b>	<b>78</b>	<b>77</b>	<b>82</b>	48	72	Yes
<b>Manchester Boulevard Segment</b>									
Site 2	<b>91</b>	<b>81</b>	74	74	72	<b>77</b>	44	72	Yes
Site B	<b>98</b>	<b>88</b>	<b>81</b>	<b>81</b>	<b>79</b>	<b>85</b>	51	72	Yes
Site I	<b>95</b>	<b>85</b>	<b>78</b>	<b>78</b>	<b>77</b>	<b>82</b>	48	72	Yes
Site J	<b>93</b>	<b>83</b>	<b>76</b>	<b>76</b>	74	<b>79</b>	46	72	Yes
Site L	53	44	36	36	35	40	7	72	No
<b>Prairie Avenue Segment</b>									
Site 3	<b>82</b>	72	65	65	64	69	36	72	Yes
Site 4	<b>102</b>	<b>92</b>	<b>85</b>	<b>85</b>	<b>83</b>	<b>89</b>	55	72	Yes
Site 5	<b>90</b>	<b>80</b>	<b>73</b>	<b>73</b>	71	<b>77</b>	43	72	Yes
Site C	<b>98</b>	<b>88</b>	<b>81</b>	<b>81</b>	<b>79</b>	<b>85</b>	51	72	Yes
Site D	70	60	52	52	51	56	23	72	No
Site E	69	59	51	51	50	55	22	72	No
Site F	<b>82</b>	72	65	65	64	69	36	72	Yes
Site G	<b>77</b>	67	60	60	58	64	30	72	Yes
Site H	66	56	49	49	47	53	19	72	No
Site M	44	34	26	26	25	30	-3	72	No

Source: US Department of Transportation, Federal Transportation Authority, Transit Noise and Vibration Impact Assessment  
 Refer to **Appendix N-5** for Construction Vibration Worksheets  
 Note: **Boldface type** indicates noise level in exceedance of the significance threshold.

The sites that exceed the human annoyance significance threshold of 72 PPV ips for forecasted vibration

levels due to construction activities from heavy equipment would range from 73 PPV ips for large dozers and drilling equipment at Site 5 (lodging uses on the southern portion of W. Century Boulevard) to 102 PPV ips for piles drivers at Site 4 (mixed-use residential along west side of Prairie Avenue).

As mentioned previously, the CCP includes the designation of a Community Affairs Liaison who would be responsible for responding within 24 hours to any complaints about construction activities related to noise and vibration. Additionally, implementation of **PDF NOISE-2** 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. The Construction Vibration Reduction Plan would require continuous monitoring and collection of vibration data to verify vibration levels are below the warning level PPV. In the event the regulatory levels of PPV are triggered, construction activities would halt to visually inspect sensitive buildings for damage. Additionally, **PDF NOISE-2** would require vibration-generating equipment to be located at specified distances from adjacent noise receptors.

**Table 4.10-28: Proposed Project Construction Related Vibration Impacts (PDF NOISE-2) – Human Annoyance** implements **PDF NOISE-2** and provides the adjusted distances required to reduce vibration to below the perceptible levels of 72 VdB. As shown, impacts related to construction vibration impacts to human annoyance with adjusted distance of construction equipment would be less than significant with implementation of **PDF NOISE-2**.

Table 4.10-28

Proposed Project Construction Related Vibration Impacts (PDF NOISE-2) – Human Annoyance

Equipment	Without PDF NOISE-2		With PDF NOISE-2		Exceeds Significance Threshold of 72 VdB?
	Distance (feet)	Estimated Vibration Velocity Levels (PPV ips)	Distance (feet)	Estimated Vibration Velocity Levels (PPV ips)	
Pile Driver (impact)	25	104	310	71	No
Vibratory Roller	25	94	150	71	No
Large Bulldozer	25	87	85	71	No
Caisson Drilling	25	87	85	71	No
Loaded Trucks	25	86	75	71	No
Jackhammer	25	79	45	71	No
Small bulldozer	25	58	25	58	No

Source: US Department of Transportation, Federal Transportation Authority, Transit Noise and Vibration Impact Assessment

### Construction Haul Route Related Vibration Impacts

In addition to on-site construction activities, construction delivery/haul trucks would generate ground-borne vibration as they travel along the proposed Project's anticipated off-site truck travel routes. Based on FTA data,<sup>72</sup> the vibration generated by a typical heavy-duty truck would be approximately 63 VdB (0.00566 PPV) at a distance of 50 feet from the truck.

Existing buildings along the proposed Project's anticipated off-site truck travel routes (Florence Avenue, Manchester Boulevard, Prairie Avenue, and Century Boulevard) that are situated approximately 35 feet from the truck travel pathway would be exposed to ground-borne vibration levels of approximately 0.01 PPV. This forecasted vibration level would be below the most stringent building damage criteria of 0.12 PPV.<sup>73</sup> Therefore, vibration impacts with respect to building damage from off-site construction truck travel on public roadways would be less than significant.

In addition, vibration sensitive uses (e.g., residential, hotel uses) are located along Florence Avenue, Manchester Boulevard, Prairie Avenue, and Century Boulevard. Ground-borne vibration levels generated by proposed Project off-site construction truck travel would be below the FTA 72 VdB significance threshold,<sup>74</sup> as these uses are located more than 25 feet from the truck travel pathway. Therefore, vibration impacts with respect to human annoyance from off-site construction truck travel would be less than significant for the vibration sensitive land uses located along these roadways.

### 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 ground-borne vibration. Jointed rail, worn rail, and wheel impacts at special track work can all cause substantial increases in ground-borne vibration. It is rare for ground-borne vibration to be a problem with elevated railways except when guideway supports are located within 50 feet of buildings.<sup>75</sup> For rubber-tired ATS trains, the smoothness of the roadway/guideway is the critical factor; if the surface is smooth, vibration problems are unlikely.

<sup>72</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, FTA Report No. 0123, September 2018, accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf)

<sup>73</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, FTA Report No. 0123, September 2018, accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf)

<sup>74</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, FTA Report No. 0123, September 2018, accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf)

<sup>75</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018, accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf)

The vibration sensitive land uses 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. Based on the adjusted vibration level curve, the estimated ground-borne vibration levels would be approximately 67 VdB for monorail trains (rapid transit or light rail vehicles) and 64 VdB for rubber-tired ATS trains. Consequently, the maximum vibration level of the uses along the guideway would be below the FTA recommended maximum acceptable level threshold of 72 VdB.<sup>76</sup>

As such, transit-related ground-borne vibration for rubber-tired ATS train vehicles would be less than significant.

### Mitigation Measures

Vibration impacts from construction and operation of the Project would be less than significant and do not require any mitigation.

## 4.10.9 CUMULATIVE IMPACTS

The analysis of changes to the community noise environment based on cumulative conditions considers development of the proposed Project in combination with ambient growth and other development projects located near the Project area. The potential for cumulative noise impacts is primarily related to the distance between each related project's stationary noise sources, as well as both the presence of existing structures in the Project area and the cumulative traffic that the cumulative development would add to the surrounding roadway network. As discussed in **Section 4.0, 4.0.6: Cumulative Scenario**, there are 74 cumulative projects within the City.

### 4.10.9.1 Noise

#### Construction

##### Equipment Noise

Noise from the construction of development projects is typically localized and has the potential to affect noise-sensitive uses within 500 feet of the construction site. Thus, noise from construction activities for two projects within 1,000 feet of each other can contribute to a cumulative noise impact for receptors located midway between the two construction sites. The cumulative projects located within 1,000 feet of the Project area are Project Nos. 7, 8, 20, 30, 35, 44, 37, 48, 60, and 73.

As shown in **Table 4.10-15** through **4.10-21**, construction noise impacts would be below the FTA criteria threshold of 90 dBA (Leq-1hour) during the daytime and 80 dBA (Leq-1hour) during the nighttime period

<sup>76</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, FTA Report No. 0123, September 2018, accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf)

for residential uses and 100 dBA (Leq-1hour) during the daytime and nighttime periods for commercial and industrial uses. The timing of the construction activities for cumulative projects cannot be defined, as Projects would be required to obtain a permit if nighttime construction is proposed. Therefore, any quantitative analysis of those projects to assume concurrent construction during the nighttime period would be entirely speculative. Should construction activities during the nighttime period of any phase of construction occur concurrently with construction of the cumulative projects, it could reasonably be assumed that cumulative projects would implement noise reduction features and mitigation measures to lessen to the extent feasible potential noise impacts from construction. Therefore, the cumulative construction equipment noise impact would be less than significant.

#### Off-Site Construction Noise

In terms of off-site construction-related noise, the location of the cumulative projects suggests that off-site construction truck travel associated with the related projects would occur along portions of the same travel routes as those anticipated to be used by the proposed Project's off-site construction trucks.

As mentioned previously, the primary delivery and haul routes proposed during construction of the proposed Project would utilize Florence Avenue, Manchester Boulevard, Prairie Avenue, and Century Boulevard, which have been designated by the City as appropriate for heavy truck use. Should use of the same designated haul routes by any of the cumulative projects overlap with use of those haul routes during the same period, traffic volumes could potentially increase such that the resulting cumulative noise increase due to construction traffic along the haul routes would exceed 3 dBA over ambient noise levels at noise-sensitive receptors along those routes. However, similar to the proposed Project, related projects would likely designate construction routes to freeway and major arterials, avoiding minor arterials.

As mentioned previously, it takes a doubling of traffic volumes (100 percent increase) in order to increase traffic noise levels by 3 dBA. As compared to adjusted baseline average daily traffic volumes along the roadways mentioned above, the sound power generated by the maximum anticipated number of construction trucks would not be equivalent or greater to a doubling of the maximum ADT along West Century Boulevard, Manchester Boulevard or South Prairie Avenue. In combination with the cumulative projects within 1,000 feet, construction-related traffic would not result in a double or tripling of existing daily traffic volumes on streets around the proposed Project. As such, the cumulative exceedances of related project construction truck traffic would not be considered cumulative considerable. Therefore, cumulative impacts associated with off-site construction noise would not be cumulatively considerable and would be less than significant.

## Operation

### Roadway Noise

Noise and vibration for the six operational scenarios was based on VMTs with and without the proposed Project. The Opening Year (2027) and Future Horizon Year (2045) scenarios include the development of the related projects identified in **Section 4.0, 4.0.6**. In addition, the Transportation Study (see **Appendix O**) used the SCAG 2020–2045 RTP/SCS<sup>77</sup> socio-economic data (SED) for base year (2016) and Future baseline (2045) constrained conditions were utilized as the basis for developing the socio-economic data for use with the Inglewood Travel Demand Forecast (TDF) model. Updates to the socioeconomic data include those associated with known related projects from various cities and adjacent jurisdictions. Opening year (2027) SED database was used for the Inglewood TDF developed using interpolation of the 2016 and 2045 databases from SCAG 2020–2045 RTP/SCS data updated for related projects. Therefore, the Opening Year (2027) and Future Horizon Year (2045) scenarios account for the growth associated with related project and future growth as provided by SCAG.

As detailed in **Appendix N.2-6**, roadway noise levels from Opening Year (2027) Conditions With NFL Event With and Without ITC Project would result in a decrease in noise due to removal and redistribution of trips as designed by the Project. Therefore, the roadway noise level during the daytime or nighttime periods would not exceed the threshold of significance of an increase in noise level of 3 dBA Leq to or within the “normally unacceptable” or “clearly unacceptable” land use compatibility categories or result in an increase of 10 dBA when noise levels remain within acceptable limits.

As detailed in **Appendix N.2-6**, roadway noise levels from Future Horizon Year (2045) With NFL Event With and Without ITC Project would result in a decrease in noise due to removal and redistribution of trips as designed by the Project. Therefore, the roadway noise level during the daytime or nighttime periods would not exceed the threshold of significance of an increase in noise level of 3 dBA Leq to or within the “normally unacceptable” or “clearly unacceptable” land use compatibility categories or result in an increase of 10 dBA when noise levels remain within acceptable limits.

Therefore, noise impacts resulting from the proposed Project related to traffic generated noise for both the Opening Year (2027) and Future Horizon Year (2045) with NFL Event With ITC Project are less than significant and would not be cumulatively considerable.

<sup>77</sup> Southern California Association of Governments (SCAG), Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Draft, “Chapter 1,” <https://www.connectsocial.org/Pages/Connect-SoCal-Draft-Plan.aspx>, accessed on September 2021.

#### 4.10.9.2 Vibration

##### Construction

Cumulative development in the Project vicinity may result in the exposure of people to or the generation of excessive ground-borne vibration. The nearest cumulative project is located at 101, 125, 139, 140, and 150 Market Street (Project No. 30) located approximately 100 feet from the proposed guideway. As shown in **Table 4.10-25** above, construction vibration impacts to building damage would occur with impact pile drivers located within 55 feet of the nearest receptor. Should construction of Project No. 30 overlap with the proposed Project, impacts to vibration sensitive receptors would be potentially significant.

As previously discussed for vibration, the forecasted vibration levels due to construction vibration velocities would exceed the structural damage threshold of 0.2 in/sec PPV at certain sensitive receptors during various construction phases.

**Table 4.10-26** shows the forecasted vibration levels due to construction activities would exceed the building damage significance threshold at certain locations along the proposed Project. Additionally, **Table 4.10-27** shows the forecasted vibration levels due to construction activities would exceed human annoyance significance thresholds. The CCP would provide a community affairs liaison to investigate noise disturbance and undertake all feasible measures are implemented to reduce construction vibration levels as deemed appropriate. Implementation of **PDF-Noise-2** would require a preparation of a Construction Vibration Reduction Plan to ensure minimization of construction vibration at nearby sensitive receptors from vibration created by construction activities. Additionally, **PDF-Noise-2** would require vibration-generating equipment to be located at specified distances from adjacent noise receptors.

**Table 4.10-28** provides the adjusted distances required to reduce vibration to below the perceptible levels of 72 VdB. Additionally, there are no vibration-sensitive receptors that would be adjacent to both the proposed Project and Project No. 30, as the area mostly consists of commercial uses. Therefore, Proposed Project impacts would not be affected by cumulative project construction activity. Cumulative impacts related to construction vibration would be less than significant.

##### Operation

Cumulative noise impacts attributable to stationary sources that operate on a daily basis occur when these sources are located in relative proximity to one another. The cumulative projects located in the proximity to the Project area mentioned above generally consist of residential, retail, or other types of commercial uses. These types of uses are not typically associated with excessive exterior stationary source noise. Noise levels from stationary sources within each cumulative project development site would also be reduced to less-than-significant levels at the property line due to IMC requirements limiting noise from stationary sources, such as Section 5-39.

Additionally, the vibration sensitive land uses 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. Based on the adjusted vibration level curve, the estimated ground-borne vibration levels would be approximately 67 VdB for monorail trains (rapid transit or light rail vehicles) and 64 VdB for rubber-tired ATS trains. Consequently, the maximum vibration level of the uses along the guideway would be below the FTA recommended maximum acceptable level threshold of 72 VdB.<sup>78</sup> As such, transit-related ground-borne vibration for rubber-tired ATS train vehicles would be less than significant.

The proposed Project would not increase vibration in the area; as such impacts are considered less than significant. When combined with other related project within the immediate area (see **Section 4.0, 4.0.6**) the effects of vibration would not be cumulatively considerable.

#### 4.10.10 CONSISTENCY WITH CITY OF INGLEWOOD GENERAL PLAN

##### Noise Element

The proposed Project is consistent with goals listed in the Noise Element as discussed below:

**Goal 1:** *Provide for the reduction of noise where the noise environment represents a threat to public health and welfare. In those areas where the environment represents a threat to the public health and welfare, it is the objective of the City to reduce environmental hazards to levels consistent with the protection of the public health and welfare.*

**Consistent.** As discussed in **Table 4.10-15** through **4.10-22**, construction noise levels would be below the FTA criteria threshold of 90 dBA (Leq-1hour) during the daytime and 80 dBA (Leq-1hour) during the nighttime period for residential uses and below 100 dBA (Leq-1hour) during the daytime and nighttime periods for commercial and industrial uses. Additionally, the CCP includes various noise reduction strategies for construction, which integrates several features to further reduce noise levels. The CCP is meant to proactively address potential effects of the construction of the Project on the community, to protect and maintain acceptable limits and prevent degradation of the environment. For these reasons, construction noise would be consistent with Goal 1.

**Goal 3:** *Protect and maintain those areas having acceptable noise environments. In those areas where a quality environment now exists, it is the objective of the City to prevent degradation of that environment.*

**Consistent.** As discussed in **Table 4.10-15** through **4.10-22**, construction noise levels would be below the FTA criteria threshold of 90 dBA (Leq-1hour) during the daytime and

<sup>78</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, FTA Report No. 0123, September 2018, accessed September 2021, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf)

#### 4.10 Noise

80 dBA (Leq-1hour) during the nighttime period for residential uses and below 100 dBA (Leq-1hour) during the daytime and nighttime periods for commercial and industrial uses. Additionally, the CCP includes various noise reduction strategies for construction, which integrates several features to further reduce noise levels. The CCP is meant to proactively address potential effects of the construction of the Project on the community, to protect and maintain acceptable limits and prevent degradation of the environment. For these reasons, construction noise would be consistent with Goal 3.

**Goal 4:** *Provide sufficient information concerning the community noise levels so that noise can be objectively considered in land use planning decisions. Noise and land use compatibilities can be avoided for new developments when noise is properly considered in the planning and design of the project. It is the objective of the City to prevent future land use and noise conflicts through the planning process.*

**Consistent.** As shown in **Table 4.10-23**, operational noise levels from either the Rubber-tired ATS Train or monorail would not result in increase of 3 dBA to or within the “normally unacceptable” or “clearly unacceptable” compatibility category for land uses. Consistent with Goal 4, the proposed Project would not result in noise conflicts concerning community noise levels.

#### Environmental Justice Element

The proposed Project is consistent with goals listed in the Environmental Justice Element as discussed below:

**Policy EJ-2.11:** *Continue to enforce the City's Noise Ordinance to ensure compliance with noise standards.*

**Consistent.** As discussed in **Table 4.10-15** through **4.10-22**, construction noise levels would be below the FTA criteria threshold of 90 dBA (Leq-1hour) during the daytime and 80 dBA (Leq-1hour) during the nighttime period for residential uses and below 100 dBA (Leq-1hour) during the daytime and nighttime periods for commercial and industrial uses. Additionally, the CCP includes various noise reduction strategies for construction, which integrates several features to further reduce noise levels. The CCP is meant to proactively address potential effects of the construction of the Project on the community, to protect and maintain acceptable limits and prevent degradation of the environment. For these reasons, construction noise would be consistent with Policy EJ-2.11.

## 4.11 POPULATION, EMPLOYMENT, AND HOUSING

### 4.11.1 INTRODUCTION

This section of the Draft Recirculated Environmental Impact Report (Recirculated Draft EIR) evaluates the potential effects of the Inglewood Transit Connector Project (proposed Project) on population, housing, and employment conditions. This section identifies and describes existing and projected levels of population, employment, and housing in the City of Inglewood (City) and analyzes the effects that would be caused by development of the proposed Project. The existing and projected population, employment data, and housing stock as well as a description of the methodology and framework guide the evaluation of the proposed Project's potential population, housing, and employment impact.

The Revised Initial Study (included in **Appendix A.2** of this Recirculated Draft EIR) prepared prior to the preparation of the December 2020 Draft EIR utilizes the California Environmental Quality Act (CEQA) Environmental Checklist to assess the Project's potential environmental impacts associated with population, employment, and housing. For one of these screening thresholds, the Revised Initial Study concluded the proposed Project would have a “Less than Significant Impact;” thus, no further analyses of this topic was required in an EIR. The following impact does not require any additional analysis in this Recirculated Draft EIR:

- Potential impacts related to displacement of housing which would necessitate the construction of replacement housing elsewhere. Development of the proposed Project would not require the removal of existing or proposed housing uses.

After circulation of the December 2020 Draft EIR for public review, the City revised the design of the proposed Project in response to consultation with key stakeholders in the community and comments received on the December 2020 Draft EIR. Specific changes to the proposed Project include raising the height of the ATS guideway along Market Street to preserve existing views of historic buildings, relocating the Prairie Avenue/Pincay Drive Station to the southwest corner of Prairie Avenue and Manchester Boulevard, redesign of the proposed MSF to allow this facility to be located on the proposed site with a new Vons store, and realignment of the guideway and stations on Prairie Avenue to the west side of Prairie Avenue. As it relates to employment impacts, these changes resulted in fewer jobs displaced due to the proposed Project compared to the December 2020 Draft EIR.

These changes to the design of the proposed Project do not create the potential for significant impacts related to the impacts above. The revised proposed Project would result in additional property acquisitions that would require demolition prior to construction of the proposed Project. Additionally, the revised proposed Project would include a Vons store replacement which would be developed prior to construction of the proposed Project. These changes would not alter the level of significance for the impact discussed above.

Impacts related to population, employment, and housing found to be less than significant are further discussed in **Section 6.3: Effects Found Not to Be Significant**.

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Recirculated Draft EIR.

#### 4.11.2 OVERVIEW OF POPULATION, EMPLOYMENT, AND HOUSING

The proposed Project is located within the Southern California Association of Governments (SCAG) region which includes six counties. With more than 19 million in population, 6 million in households, and 8 million jobs, the SCAG region is the nation's largest metropolitan planning organization.<sup>1</sup> In line with national trends, annual population growth in the SCAG region has slowed and is anticipated to continue slowing from an annual growth rate of about 0.85 percent in 2020 to 0.45 percent by 2045. The decrease in annual population growth rate is driven by a combination of several factors: 1) women are having fewer children and are doing so at a later age, leading to a decline in fertility, 2) high housing costs, 3) an aging population, and 4) a decrease in net-migration.

The employment landscape in the region has followed a “boom and bust” cycle that is in line with the employment trends in Southern California. This trend is exemplified by the growth in housing development in the 2000s and the following bust starting in 2008 in the housing construction and service sectors. Despite this, the SCAG region has shown great resilience as the number of jobs in the region continues to grow overall. In 2019, there were approximately 8.7 million jobs in the region and every county in the region has experienced a net increase in jobs between the years 2000 and 2019.<sup>2</sup>

Housing in the SCAG region has traditionally followed the trend of lower-density development, which has occurred farther from employment-rich areas, increasing congestion, automobile dependency, leapfrog development and air pollution, and limiting the effectiveness of public transit. This trend has been shifting with a push-and-pull between new single-family development in traditionally suburban or formerly rural areas and multi-family residential developments in higher-density communities. A continued need for housing development is clear from the region's population trend as an additional 930,000 people moved into Southern California from 2006 to 2016.

<sup>1</sup> SCAG. *Connect SoCal, 2020-2045 RTP/SCS*. Chapter 2 SoCal Today. <https://www.connectsocial.org/Documents/Adopted/fConnectSoCal-02-Plan.pdf>. Accessed September 2, 2021.

<sup>2</sup> SCAG. *Certified Final Connect SoCal PEIR*. [https://www.connectsocial.org/Documents/PEIR/draft/dPEIR\\_ConnectSoCal\\_3\\_14\\_PopulationHousing.pdf](https://www.connectsocial.org/Documents/PEIR/draft/dPEIR_ConnectSoCal_3_14_PopulationHousing.pdf). Accessed September 2, 2021.

#### 4.11.3 METHODOLOGY

The following analysis is based on information on construction and operation of the proposed Project and information on City population, employment, and housing data and characteristics. Sources of information for population-, employment-, and housing-related estimates include the City General Plan and Housing Element,<sup>3</sup> Southern California Association of Governments' (SCAG) 2019 Local Profiles (SCAG 2019 Local Profiles),<sup>4</sup> SCAG's 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (SCAG 2020–2045 RTP/SCS),<sup>5</sup> and SCAG's 6th Cycle Regional Housing Needs Allocation (6th Cycle RHNA).<sup>6</sup>

The information contained in this section is used as a basis for analysis of project and cumulative impacts. However, changes in population and housing, in and of themselves, are social and economic effects and under CEQA are not physical effects on the environment. CEQA provides that economic or social effects are not considered significant effects on the environment unless the social and/or economic effects are connected to physical environmental effects. A social or economic change related to a physical change may serve as a linkage between the proposed Project and a physical environmental effect or may be considered in determining whether the physical change is significant.<sup>7</sup> The direction for treatment of economic and social effects is stated in CEQA Guidelines section 15131(a):

*Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on physical changes.<sup>8</sup>*

#### 4.11.4 REGULATORY FRAMEWORK

##### 4.11.4.1 State Regulations and Directives

###### *California Housing Element Requirement*

California law requires cities and counties to include a housing element as one of the nine State-mandated elements of the General Plan.<sup>9</sup> The housing element must address housing conditions and housing needs

<sup>3</sup> City of Inglewood, *Housing Element 2013-2021*, <https://www.cityofinglewood.org/DocumentCenter/View/127/2013-2021-Housing-Element-Adopted-January-28-2014-PDF>. Accessed September 2, 2021.

<sup>4</sup> SCAG. *2019 Local Profiles*. <https://www.scag.ca.gov/Documents/Inglewood.pdf>. Accessed September 2, 2021.

<sup>5</sup> SCAG. *Adopted Final Connect SoCal*. <https://connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>. Accessed September 2, 2021.

<sup>6</sup> SCAG. *Regional Housing Needs Assessment & Housing*. <http://www.scag.ca.gov/programs/Pages/Housing.aspx>. Accessed September 2, 2021.

<sup>7</sup> CEQA Guidelines section 15382.

<sup>8</sup> CEQA Guidelines section 15131(a).

<sup>9</sup> Government Code Section 65580, et seq.

in the community. Cities and counties are required to update their housing elements every 8 years following the implementation of SB 375.<sup>10</sup> The housing element must identify and analyze existing and projected housing needs and “make adequate provision for the existing and projected needs of all economic segments of the community,” among other requirements. The City’s Housing Element was updated on January 28, 2014.<sup>11</sup>

### **California Relocation Assistance**

California Government Code Sections 7260-7277 establish a uniform policy for fair and equitable treatment of people or businesses displaced as a direct result of programs or projects undertaken by a public entity.<sup>12</sup> The primary purpose is to ensure that these persons shall not suffer disproportionate injuries as a result of programs and projects designed for the benefit of the public and to minimize the hardship of those displaced.

#### **4.11.4.2 Regional Regulations and Directives**

##### **Regional Housing Needs Assessment**

The Regional Housing Needs Assessment (RHNA) is mandated as part of the periodic process of updating local housing elements of the General Plan. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods. The current planning period, 2021 to 2029, is considered the 6th RHNA Planning Cycle. Local jurisdictions received the draft RHNA Allocations on September 4th, 2020.<sup>13</sup> The City is planning to approve an updated Housing Element before March 2022 to account for the SCAG 6th Cycle RHNA projections as amended by the adoption of SB 375 in 2008.<sup>14</sup> Jurisdictions have until October 15, 2021, to submit housing elements to the HCD. The City’s Housing Element 2021–2029 is currently pending submittal to HCD for approval.

Communities use the RHNA numbers in land use planning, prioritizing local allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment, and housing growth. The RHNA does not encourage or promote growth, but rather is designed to enable communities to anticipate growth, so that collectively the region and sub-region can grow in ways that enhance quality of life, improve access to jobs, promotes transportation mobility, and addresses social equity and fair share housing needs.

10 California Legislative Information. Senate Bill No. 375. [https://leginfo.ca.gov/faces/billNavClient.xhtml?bill\\_id=2007200805B375](https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=2007200805B375). Accessed September 7th, 2021.  
 11 City of Inglewood. *General Plan*. <https://www.cityofinglewood.org/209/General-Plan>. Accessed September 7th, 2021.  
 12 California Government Code Section 7260-7277.  
 13 SCAG. *Regional Housing Needs Assessment (RHNA) & Housing*. <http://www.scag.ca.gov/programs/Pages/Housing.aspx>. Accessed September 7th, 2021.  
 14 California Government Code Section 65583 (c)(1)(A).

### **SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy**

SCAG’s Regional Council adopted the 2020–2045 RTP/SCS<sup>15</sup> on September 3rd, 2020. The 2020–2045 RTP/SCS was adopted as part of SCAG’s planning obligations. The 2020–2045 RTP/SCS is a long-range visioning plan that serves as an important planning document for the region that balances future mobility and housing needs with economic, environmental, and public health goals. The plan charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably. The 2020–2045 RTP/SCS includes land use policies to guide the region’s development, including planning for additional housing and jobs near transit, and planning for changing demand in types of housing. Analysis for housing needs in the region as a whole and in individual cities is also completed as part of the metropolitan planning organization’s obligation under the State mandate. One goal of the 2020–2045 RTP/SCS is to encourage land use and growth patterns that facilitate transit and active transportation.

SCAG is working with Los Angeles County Metropolitan Transportation Authority (Metro) and the City to ensure inclusion of the ITC project in SCAG’s Federal Transportation Improvement Program (FTIP), which would be subsequently included in the Federal Statewide Improvement Program (FSTIP).

#### **4.11.4.3 Local Regulations and Directives**

##### **City General Plan**

The City General Plan is a comprehensive policy document that sets forth goals, objectives, and policies for the future development of the City. The General Plan also designates the location of desired future land uses within the City. A summary of the General Plan Elements is provided under **Section 4.9: Land Use and Planning**. Goals, objectives, and policies of the City’s General Plan Housing and Land Use Elements are applicable to this Population, Employment, and Housing section of the Recirculated Draft EIR and is outlined as follows:

##### **Housing Element**

The City General Plan Housing Element 2013–2021<sup>16</sup> covering the 5th cycle of RHNA was adopted on January 28, 2014. The Housing Element presents a framework upon which the City can implement a comprehensive housing program to provide its residents with decent and affordable housing.

15 SCAG. *Adopted Final Connect SoCal*. <https://www.connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>. Accessed September 2, 2021.

16 City of Inglewood. *Housing Element 2013-2021*. <https://www.cityofinglewood.org/DocumentCenter/View/127/2013-2021-Housing-Element-Adopted-January-28-2014-PDF>. Accessed September 2, 2021.

#### 4.11 Population, Employment, and Housing

The program established policies to create and preserve quality residential neighborhoods along with establishing policies and programs to mitigate housing shortages.

The Housing Element established the following goals for housing which are applicable to the proposed Project:

- Goal 2:** Maintain the existing housing stock and neighborhoods by promoting the maintenance, rehabilitation, modernization, and energy efficient upgrades of existing housing as well as the beautification and security of residential neighborhoods.
- Goal 3:** Encourage the Production and Preservation of Housing for All Income Categories, particularly around high-quality transit, including workers in the City that provide goods and services.
- Goal 7:** Encourage Energy Efficiency and Greenhouse Gas Reductions.

#### Land Use Element

The City's Land Use Element<sup>17</sup> was adopted in 1980 and subsequently amended in 1986, 2009, 2016, and 2020. Applicable Land Use goals for the Population, Employment, and Housing section are as follows:

##### General

- Goal:** Help promote sound economic development and increase employment opportunities for the City's residents by responding to changing economic conditions.
- Goal:** Develop a land use element that facilitates the efficient use of land for conservation, development, and redevelopment.
- Goal:** Promote Inglewood's image and identify as an independent community within the Los Angeles Metropolitan area.

##### Commercial

- Goal:** Create and maintain a healthy economic condition within the present business community and assist new business to located within the City.
- Goal:** Protect local businessmen and encourage the importance of maintaining a strong commercial district in the downtown.
- Goal:** Promote the development of commercial/recreational uses which would complement those which already are located in Inglewood.

<sup>17</sup> City of Inglewood. *Land Use Element*. <https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-PDF>. Accessed September 7, 2021.

#### 4.11 Population, Employment, and Housing

#### Downtown Transit Oriented District

- Goal 1:** Downtown is a place to live, work, shop, recreate, and be entertained.
- Goal 3:** Downtown provides a unique mix of accessibility options including light rail, pedestrians, bicycles, autos, buses, and advanced technology local transit.
- Goal 4:** Downtown is a major economic engine providing jobs, sales tax, and other revenues.
- Goal 5:** Downtown is a model for sustainable development.

#### Environmental Justice Element

The City's Environmental Justice Element<sup>18</sup> was adopted on June 30, 2020. Applicable Environmental Justice goals for the Population, Employment, and Housing section are as follows:

- Goal:** The community's exposure to pollution in the environment is minimized through sound planning and public decision making.
- Goal:** Adequate and equitably distributed public facilities are available in the community.

### 4.11.5 EXISTING CONDITIONS

#### 4.11.5.1 Existing Setting

##### Population

The City is located in Los Angeles County (County) and became an incorporated City on February 8th, 1908, with a population of 1,200.<sup>19</sup> The City has continued to expand and develop to reach an estimated population of 113,559 in 2018.<sup>20</sup> The City's population has stabilized over recent years. According to SCAG's 2019 Local Profile's report the net increase in population from 2000 to 2018 was approximately 979 and the SCAG 2020–2045 RTP/SCS growth forecast estimates the City's population to increase to 137,100 by 2045. With over 19 million people in the region as of January 2019, the SCAG region is the nation's second-largest combined statistical area<sup>21</sup> in the nation. The population growth trend within the larger SCAG region has averaged approximately 0.82 percent per year from 2000 to 2016, which is about

<sup>18</sup> City of Inglewood. *Environmental Justice Element*. <https://www.cityofinglewood.org/DocumentCenter/View/14211/Environmental-Justice-Element#:~:text=The%20Inglewood%20General%20Plan%20Environmental,City%2C%20particularly%20for%20disadvantaged%20communities>. Accessed September 2, 2021.

<sup>19</sup> City of Inglewood. *City History*. <https://www.cityofinglewood.org/512/City-History>. Accessed September 2, 2021.

<sup>20</sup> SCAG. *2019 Local Profiles*. <https://www.scag.ca.gov/Documents/Inglewood.pdf>. Accessed September 2, 2021.

<sup>21</sup> Combined Statistical Area is a United States Office of Management and Budget (OMB) term for a combination of adjacent metropolitan and micropolitan statistical areas across the US. These areas consist of various combinations areas with economic ties measured by commuting patterns.

half of the 1.65 percent annual population growth rate of the region from 1970 to 2000. This decrease in population growth rate is expected to continue with 2016 to 2045 averaging 0.61 percent annual population growth rate.<sup>22</sup> The City is one of 191 cities in the SCAG region and resides within one of the six counties within the metropolitan planning organization (MPO).<sup>23</sup>

**Table 4.11-1: Population Growth in the City** summarizes the population trends for the City from 2000 to 2018, including growth forecast for 2040 and 2045. According to SCAG, forecasted population growth for the City would be approximately 20 percent between 2016 and 2045.

**Table 4.11-1  
Population Growth in the City**

Year	2000	2006	2012	2016	2018	2045
Population Estimate	112,580	111,777	110,623	114,300*	113,559	137,100*

Source: SCAG. 2019 Local Profiles. [https://scag.ca.gov/sites/main/files/file-attachments/inglewood\\_localprofile.pdf?1606011259](https://scag.ca.gov/sites/main/files/file-attachments/inglewood_localprofile.pdf?1606011259). Accessed September 7, 2021.

\* SCAG. 2020-2045 Connect SoCal Demographics and Growth Forecast.

[https://www.connectsocial.org/Documents/Draft/dConnectSoCal\\_Demographics-And-Growth-Forecast.pdf](https://www.connectsocial.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf). Accessed September 7, 2021.

### Housing

Similar to the population trend in the City, the number of households in the City stayed relatively stable throughout the 2000s, with a net increase of 213 units in the number of households from 2000 to 2018. The increase accounts for an approximately 0.6 percent net increase during the 2000 to 2018 time period. The household numbers reached 37,018 households in 2018.<sup>24</sup>

The SCAG region that includes the proposed Project is expecting to add 1.6 million households between the years 2016 to 2045.

**Table 4.11-2: Number of Households in the City** summarizes the number of households trend from the year 2000 and includes forecast data from the 2020–2045 RTP/SCS for the number of projected households in 2045.<sup>25</sup> According to SCAG, forecasted housing growth for the City would be approximately 27 percent between 2016 and 2045.

22 SCAG. 2020-2045 Connect SoCal Demographics And Growth Forecast. [https://www.connectsocial.org/Documents/Draft/dConnectSoCal\\_Demographics-And-Growth-Forecast.pdf](https://www.connectsocial.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf). Accessed September 7, 2021.

23 SCAG. <http://www.scag.ca.gov/Pages/default.aspx>. Accessed September 7, 2021.

24 SCAG. 2019 Local Profiles. <https://www.scag.ca.gov/Documents/inglewood.pdf>. Accessed September 7, 2021.

25 SCAG. 2020-2045 Connect SoCal Demographics And Growth Forecast.

[https://www.connectsocial.org/Documents/Draft/dConnectSoCal\\_Demographics-And-Growth-Forecast.pdf](https://www.connectsocial.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf). Accessed September 7, 2021.

**Table 4.11-2  
Number of Households in the City**

Year	2000	2006	2012	2016	2018	2045
Number of Households	36,805	36,460	36,993	37,500*	37,018	47,700*

Source: SCAG. 2019 Local Profiles. <https://www.scag.ca.gov/Documents/inglewood.pdf>. Accessed September 7, 2021.

\* SCAG. 2020-2045 Connect SoCal Demographics and Growth Forecast.

[https://www.connectsocial.org/Documents/Draft/dConnectSoCal\\_Demographics-And-Growth-Forecast.pdf](https://www.connectsocial.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf). Accessed September 7, 2021.

The RHNA is another source for predicting housing growth in a region. According to SCAG's 6th cycle RHNA numbers, the City must provide plans for a total of 7,439 units from the years 2021 to 2029. The total housing unit requirement includes 1,813 units for very-low income, 955 units for low income, 1,112 units for moderate income, and 3,559 units for above moderate income.<sup>26</sup>

### Employment

As of 2017, the City had an estimated 34,962.<sup>27</sup> This number includes wage and salary jobs and jobs held by business owners and self-employed persons and excludes unpaid volunteers, family workers, and private household workers.

Employment trend in the City can be found in **Table 4.11-3: Number of Jobs in the City**. According to SCAG, forecasted employment growth for the City would be approximately 36 percent between 2016 and 2045.

**Table 4.11-3  
Number of Jobs in the City**

Year	2007	2010	2013	2016	2017	2045
Number of Jobs	34,598	32,241	32,152	33,800*	34,962	45,900*

Source: SCAG. 2019 Local Profiles. <https://www.scag.ca.gov/Documents/inglewood.pdf>. Accessed September 7, 2021.

\* SCAG. 2020-2045 Connect SoCal Demographics and Growth Forecast.

[https://www.connectsocial.org/Documents/Draft/dConnectSoCal\\_Demographics-And-Growth-Forecast.pdf](https://www.connectsocial.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf). Accessed September 7, 2021.

The number of jobs available is further divided into the following sectors: manufacturing, construction, retail trade, and professional and management. **Table 4.11-4: 2017 Job Numbers by Sector in the City** presents the number of jobs available in each sector in the year 2017. According to SCAG 2020–2045

26 SCAG. Regional Housing Needs Assessment & Housing. <http://www.scag.ca.gov/programs/Pages/Housing.aspx>. Accessed September 7, 2021.

27 SCAG. 2019 Local Profiles. <https://www.scag.ca.gov/Documents/inglewood.pdf>. Accessed September 7, 2021.

RTP/SCS,<sup>28</sup> there were an estimated 411,000 jobs in the region in 2016 and the number of construction jobs is expected to increase to 536,000 in the region in 2045.

As presented by the SCAG 2019 Local Profiles’ Report, only 8 percent of the commuters in the City are also employed within the City limits.<sup>29</sup> The remaining 92 percent of the commuting workers travel to adjacent employment centers for work.

**Table 4.11-4  
2017 Job Numbers by Sector in the City**

Sector	Manufacturing	Construction	Retail Trade	Professional and Management
Number of Jobs	1,476	810	3,249	3,209

Source: SCAG. 2019 Local Profiles. <https://www.scag.ca.gov/Documents/Inglewood.pdf>. Accessed September 7, 2021.  
 \*\*SCAG. 2020-2045 Connect SoCal Demographics and Growth Forecast. [https://www.connectsocial.org/Documents/Draft/dConnectSoCal\\_Demographics-And-Growth-Forecast.pdf](https://www.connectsocial.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf). Accessed September 7, 2021.  
 \*\*\*Employment numbers in these sectors are estimates for analysis purposes only and does not include all jobs available within the City.

**Table 4.11-5: Employment Centers for Inglewood Residents** provides a list of where the residents of Inglewood are employed. While construction would generate a temporary workforce, construction personnel are commonly supplied by the existing construction industry within the local area. Over 800 construction jobs currently exist within the City limits according to SCAG 2019 Local Profiles.<sup>30</sup> As noted, these jobs are typically temporary for any specific project and the various trades and professions migrate as needed between construction projects.

Based on data from California Employment Development Department, the City’s unemployment rate is higher than the County and the State of California. The unemployment rate in the City is 12.8 percent<sup>31</sup> as of July 2021, as compared to the County at 10.2 percent<sup>32</sup> and the State of California at 7.9 percent.<sup>33</sup>

28 SCAG. Draft 2020-2045 Connect SoCal Demographics And Growth Forecast. [https://www.connectsocial.org/Documents/Draft/dConnectSoCal\\_Demographics-And-Growth-Forecast.pdf](https://www.connectsocial.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf). Accessed September 7, 2021.  
 29 SCAG. 2019 Local Profiles. <https://www.scag.ca.gov/Documents/Inglewood.pdf>. Accessed September 7, 2021.  
 30 SCAG. 2019 Local Profiles. <https://www.scag.ca.gov/Documents/Inglewood.pdf>. Accessed September 7, 2021.  
 31 EDD. Labor Force and Unemployment Rate for Cities and Census Designated Places. Cities and Census Designated Places by Individual County. <https://www.labormarketinfo.edd.ca.gov/data/labor-force-and-unemployment-for-cities-and-census-areas.html>. Accessed September 7, 2021.  
 32 EDD. Los Angeles County Profile. <https://www.labormarketinfo.edd.ca.gov/cgi/databrowsing/localAreaProfileQSResults.asp?selectedarea=Los+Angeles+County&selectedindex=19&menuChoice=localAreaPro&state=true&geogArea=0604000037&countyName=>. Accessed September 7, 2021.  
 33 EDD. California Profile. <https://www.labormarketinfo.edd.ca.gov/cgi/databrowsing/localAreaProfileQSResults.asp?selectedarea=California&selectedindex=0&menuChoice=localAreaPro&state=true&geogArea=0601000000&countyName=>. Accessed September 7, 2021.

These unemployment rates were obtained in the midst of the COVID-19 pandemic, with widespread business closures throughout the City and the State of California. Therefore, the unemployment numbers are much higher than the unemployment numbers that would usually occur on a State and local level. For comparison purposes, the City had an unemployment rate of 5.1 percent in January 2020, before the COVID-19 pandemic. In the same period, the County and the State had an unemployment rate of 4.5 percent and 4.3 percent, respectively.<sup>34</sup>

**Table 4.11-5  
Employment Centers for Inglewood Residents**

Local Jurisdiction	Number of Commuters	Percent of Total Commuters
Los Angeles	17,022	42.2%
Inglewood	3,177	7.9%
Santa Monica	1,614	4.0%
Culver City	1,281	3.2%
Torrance	1,215	3.0%
El Segundo	972	2.4%
Long Beach	682	1.7%
Hawthorne	657	1.6%
Carson	602	1.5%
Beverly Hills	573	1.4%
All Other Destinations	12,533	31.1%

Source: SCAG. 2019 Local Profiles. <https://www.scag.ca.gov/Documents/Inglewood.pdf>. Accessed September 7, 2021.

**4.11.5.2 Existing Project Area**

**Market Street Segment**

The Market Street Segment begins at the current location of the retail commercial center on the northeast corner of Market Street and Regent Street, between the intersections of Florence Avenue/Locust Street and Market Street/Regent Street. The parcels containing this existing retail commercial center to be acquired as part of the Project are currently zoned Transit Oriented Development Mixed Use 1 (MU-1). This existing commercial center is surrounded by businesses to the north and south and residential homes to the east. The vacant lot west of the commercial center at the northeast corner of Regent Avenue and Market Street is planned for development of a multi-family residential complex. Other properties along

34 EDD. Unemployment Rates (Labor Force). <https://www.labormarketinfo.edd.ca.gov/cgi/dataanalysis/labForceReport.asp?menuchoice=LABFORCE>. Accessed August 24, 2020.

this segment, including 115, 139 and 158 North Market Street and are planned for redevelopment with uses consistent with the City's New Downtown Inglewood and Fairview Heights Transit Oriented Development Plan. Adaptive reuse of the Fox Theater building in accordance with this plan is also planned. The Market Street Segment continues south on Market Street where existing businesses line the roadway on both sides. The segment continues south on Market Street until its intersection with Manchester Boulevard, where it turns east. (refer to **Figure 3.0-3: Project Vicinity Map**).

### **Manchester Boulevard Segment**

The Manchester Boulevard Segment begins at the intersection of Market Street and Manchester Boulevard and continues east along Manchester Boulevard. This segment includes private property at 150 S. Market Street, which contains an existing commercial building on the northeast corner of the intersection. Further east of 150 S. Market Street is the existing Vons commercial plaza south of Manchester Boulevard, between Hillcrest Boulevard and Spruce Avenue (refer to **Figure 3.0-3**). The majority of the uses along this segment are commercial uses, with some residential and religious uses toward the eastern end of the segment near Prairie Avenue. The segment turns south at the intersection of Manchester Boulevard and Prairie Avenue.

### **Prairie Avenue Segment**

The Prairie Avenue Segment begins at the intersection of Manchester Boulevard and Prairie Avenue at an existing commercial parcel at the southeast corner of Manchester Boulevard and Prairie Avenue. Existing businesses, multi-family residential buildings, Kelso Elementary School, and hotels are adjacent to Prairie Avenue on the west side of the roadway. The Forum, SoFi Stadium, and HPSD developments are adjacent to Prairie Avenue on the east side of the roadway. The segment terminates at the intersection of Prairie Avenue and Hardy Street.

### **Existing Employment**

The proposed Project includes the proposed acquisition of several private properties along the alignment to accommodate components of the proposed Project, as identified in **Table 3.0-5: Anticipated Project Acquisitions** in **Section 3.0: Project Description**. The existing uses on these properties include a variety of retail and general commercial uses.

These existing uses are currently operating and have existing employees. A list of the existing facilities and the number of employees currently being employed is provided in **Table 4.11-6: Estimated Existing Employment**.

**Table 4.11-6**  
**Estimated Existing Employment**

Parcel No.	Property Address	Type of Employments	Est. SF in Area	Est. Number of Employees
4015-027-030	310 E. Florence Avenue	Restaurant	1,200 SF	3
4015-027-031	300 E. Florence Avenue	Restaurant	4,762 SF	11
4015-027-032	254 N. Market Street	Restaurant	4,608 SF	10
4015-027-033	250 N. Market Street	Auto Service	44,000 SF	98
4015-027-038	240 N. Market Street	Shopping Center	12,300 SF	28
4015-027-040	230 N. Market Street	Store	22,194 SF	50
4015-027-041	224 N. Market Street	Store	5,000 SF	11
4015-027-049	222 N. Market Street	Shopping Center	25,500 SF	57
4015-027-050	210 N. Market Street	Shopping Center	7,348 SF	16
4021-010-015	150 S. Market Street	Store	16,575 SF	37
4021-024-015	500 E. Manchester Boulevard	Supermarket	76,402 SF	171 <sup>a</sup>
4021-024-015	510 E. Manchester Boulevard	Gas Station	202 SF	1
4024-008-015	923 South Prairie Avenue	Retail	9,744 SF	22
4024-009-005	945 South Prairie Avenue	Office	8,357 SF	29
4024-009-008	1003 South Prairie Avenue	Office	5,522 SF	19
4024-009-015	1011 South Prairie Avenue	Office	1,098 SF	4
4024-009-028033	1035 South Prairie Avenue	Shopping Center	26,228 SF	59
4024-009-028033	1035 South Prairie Avenue	Restaurant	3,954 SF	9
<b>Total Estimated Number of Employees</b>				<b>635</b>

Calculation Factor for 2.2371 (commercial/retail/restaurant, etc.) and 3.4965 (office only) employees per 1,000 SF are found in: Inglewood Unified School District, 2018. [https://www.lbschools.net/Asset/Files/Business\\_Services/Developer\\_Fees/2018/2018-Commercial-Fee-Justification-Study.pdf](https://www.lbschools.net/Asset/Files/Business_Services/Developer_Fees/2018/2018-Commercial-Fee-Justification-Study.pdf). Accessed September 7, 2021.

<sup>a</sup>Land areas and number of employees are rounded and estimates for analysis only.

<sup>b</sup>It should be noted that a replacement Vons store would be developed prior to construction of the proposed Project. It is anticipated that the replacement Vons store would utilize the same number of employees as the existing Vons store.

As shown, the existing uses currently have an estimated number of 635 employees. It should be noted however, that a replacement Vons store would be developed prior to construction of the proposed Project. It is anticipated that the replacement Vons store would utilize the same number of employees as the existing Vons store. Therefore, the net total of existing employees would be 464.

### 4.11.5.3 Adjusted Baseline Conditions

This section assumes the Adjusted Baseline Environmental Setting as described in **Section 4.0: Environmental Impact Analysis, 4.0-5: Adjusted Baseline**. The residential, office, retail, and entertainment uses associated with the Hollywood Park Specific Plan (HPSP) Adjusted Baseline projects would result in changes to the City's population, employment, and housing stock. **Table 4.11-7: Adjusted Baseline Projects Employment Characteristics**, details the land uses and associated residential and employment generation for the HPSP Adjusted Baseline projects.

**Table 4.11-7  
Adjusted Baseline Projects Employment Characteristics**

Land Use	Size	Generation Rate	Employee Population	Residential Population
Stadium <sup>a</sup>	70,240 seats	-	6,000 <sup>d</sup>	-
Performance <sup>b</sup> venue	6,000 seats	2.24 emp/1,000 SF	683	-
Retail <sup>c</sup>	518,077 SF	2.24 emp/1,000 SF	1,161	-
Office <sup>c</sup>	466,000 SF	3.49 emp/1,000 SF	1,626	-
Housing Units	314 units	2.99 person/unit	-	939
<b>Total</b>			<b>9,470</b>	<b>939</b>

**Notes:**

a "Stadiums" are not common land uses, and the City and surrounding jurisdictions do not have an existing employment generation rates for this use. Therefore, the employment total for the stadium was based on that provided in the San Francisco 49ers Stadium, which had a similar seat count (68,500 seats). See City of Santa Clara, 2009. *The 49ers Stadium Project EIR*. p. 176.

b "Performance Venues" are not common land uses, and the City and surrounding jurisdictions do not have an existing employment generation rates for these uses. Consistent with the City's Hollywood Park Redevelopment Draft Environmental Impact Report, and to be conservative, the "Performance" land use is assumed to use the "Retail Use" for the City generation rates. The square footage for this Performance Venue was based off of the proposed Project, which has approximately triple the seat count of the HPSP performance venue (18,000 seats or 915,000 sf). Thus, this analysis assumes square footage for Performance Venue is that of the proposed Project divided in by three, to become 305,000 sf.

c Based on employment generation factors from Inglewood Unified School District, 2018 Developer Fee Justification Study, Table 4. Assumes employee generation rate of 2.24 employee per square foot for Retail and Service uses, and 3.49 employee per square foot for Office uses.

d Anticipated Peak Stadium employment under HPSP is provided by Appendix K, Transportation Data. It is assumed that the vast majority of these jobs are event-related employment and were estimated for the purposes of transportation analysis. Although details are not available to the City, an assessment of full-time-equivalent employment at the Stadium would be materially less than the total of 6,000.

**Sources:**

City of Santa Clara, 2009. *49ers Santa Clara Stadium Project EIR*. Available: <http://santaclaraca.gov/home/showdocument?id=12770>;  
City of Inglewood, 2008, *Hollywood Park Redevelopment Draft Environmental Impact Report*; and Inglewood Unified School District, 2018. *Commercial/Industrial Development School Fee Justification Study Employment Impacts Per St. P. ES-1*.

Overall, the HPSP Adjusted Baseline projects would generate an increase of approximately 9,470 jobs and 314 residential units. By using the City's average household size of 2.99 persons per household,<sup>35</sup> the addition of 314 residential units would generate an estimated 939 people. Overall, as shown, under

35 U.S. Census, QuickFacts, Inglewood City, California, <https://www.census.gov/quickfacts/fact/table/inglewoodcitycalifornia/RHI125219>. Accessed September 7, 2021.

Adjusted Baseline conditions, the City has a residential population of 121,739<sup>36</sup> persons, employment of 44,270 jobs,<sup>37</sup> and a housing stock of 35,114 units.<sup>38</sup> As noted above, the City is currently coordinating with SCAG to update the RTP/SCS socio-economic data to reflect the growth anticipated in the City's New Downtown Inglewood and Fairview Heights Transit Oriented Development Plan and Hollywood Park Specific Plan Areas.

### 4.11.6 THRESHOLDS OF SIGNIFICANCE

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of population, employment, and housing resource impacts. As discussed previously in *Section 4.11.1: Introduction*, two screening criteria related to population and housing of Appendix G of the CEQA Guidelines were eliminated from further analysis in this EIR. The Recirculated Initial Study concluded, however, that the Project could have a potentially significant impact related to population and housing if the Project would:

**Threshold POP-1:** Induce substantial unplanned population or employment growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

### 4.11.7 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

**Impact POP-1:** Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

#### Construction

##### Population and Housing

According to SCAG's 2020–2045 RTP/SCS,<sup>39</sup> the City currently projects a population of 137,100 and 47,700 households in the year 2045. It is anticipated that the short-term construction labor needs for the proposed Project can be met by the existing construction labor force available in the greater Los Angeles

36 SCAG. 2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction. [https://scag.ca.gov/sites/main/files/file-attachments/2016\\_2040rtpscsc\\_finalgrowthforecastbyjurisdiction.pdf?1605576071](https://scag.ca.gov/sites/main/files/file-attachments/2016_2040rtpscsc_finalgrowthforecastbyjurisdiction.pdf?1605576071). Adding 939 from an increase in population from HPSP to the 2020 population numbers.  
37 SCAG. 2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction. [https://scag.ca.gov/sites/main/files/file-attachments/2016\\_2040rtpscsc\\_finalgrowthforecastbyjurisdiction.pdf?1605576071](https://scag.ca.gov/sites/main/files/file-attachments/2016_2040rtpscsc_finalgrowthforecastbyjurisdiction.pdf?1605576071). Adding 9470 from an increase in population from HPSP to the 2020 jobs numbers.  
38 SCAG. 2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction. [https://scag.ca.gov/sites/main/files/file-attachments/2016\\_2040rtpscsc\\_finalgrowthforecastbyjurisdiction.pdf?1605576071](https://scag.ca.gov/sites/main/files/file-attachments/2016_2040rtpscsc_finalgrowthforecastbyjurisdiction.pdf?1605576071). Adding 314 from an increase in population from HPSP to the 2020 housing numbers.  
39 SCAG. *2020-2045 Connect SoCal Demographics And Growth Forecast*. [https://www.connectsocial.org/Documents/Draft/dConnectSoCal\\_Demographics-And-Growth-Forecast.pdf](https://www.connectsocial.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf). Accessed September 7, 2021.

and southern California areas. For this reason, the temporary increase in construction jobs associated with the Project is not expected to result in an increase in the population of the City. In addition, the proposed Project does not include any existing residential uses that would be replaced or removed. Since no residential or housing stocks would be constructed or demolished, construction the proposed Project would have no direct impact on population or housing stock.

### Employment

The SCAG 2020–2045 RTP/SCS projects the City will have 45,900 jobs by 2045.<sup>40</sup> The proposed Project would generate a temporary workforce during the construction period between 2024 and 2027. Construction would take place over from 2024 through 2027, employing varying numbers of construction personnel as appropriate for each phase. Descriptions of the construction phases are in **Section 3.0**; aspects of construction relevant to employment are briefly summarized below:

- **Phase 1** of construction includes demolition of buildings and site improvements acquired to accommodate the proposed Project. Phase 1 construction would start in January 2024, including demolition of the existing retail commercial center at Market Street and Regent Street, the commercial buildings located at 500 Manchester Boulevard, the commercial building at 150 S. Market Street on the northeast corner of Manchester and Market Street, the retail commercial center at northwest corner of Prairie Avenue and Hardy Street, the commercial building at 401 S. Prairie Avenue, the commercial building at 945 S. Prairie Avenue, and the commercial building at 1003 S. Prairie.
- **Phase 2** would begin with construction of the elevated portion of the proposed Project (guideway and stations) along Prairie Avenue from Hardy Street to Manchester Boulevard, and work at the MSF site. Construction would occur from 2024 to 2025.
- **Phase 3** 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 and would begin in 2024 and finish in 2025.
- **Phase 4** would occur from 2025 to 2026. Phase 4 primarily includes foundation work for the ATS guideway, guideway column caps along Market Street, and the MSF building deck and shell.
- **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. Construction would occur in 2025 through 2026.
- **Phase 6** 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, completion of the Prairie Avenue/Manchester Boulevard Station, completion of the Prairie Avenue/Hardy Street

<sup>40</sup> SCAG. 2020-2045 Connect SoCal Demographics And Growth Forecast. [https://www.connectsocial.org/Documents/Draft/dConnectSoCal\\_Demographics-And-Growth-Forecast.pdf](https://www.connectsocial.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf). Accessed September 7, 2021.

Station, and completion of the MSF building, and the elevated passenger walkway to the Metro K Line Downtown Inglewood Station. Construction would occur in 2025 through 2026.

- **Phase 7** would include final site work and completion of the stations and would occur in 2026.
- **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. Phase 8 construction would occur in 2025 through 2027, with the primary construction activities occurring in 2026 and some installation of equipment starting towards the end of Phase 3 construction when sufficient aerial structure is available for the installation of the equipment.

The estimated construction workforce during each phase is provided in the **Table 4.11-8: Construction Workforce by Phase**.

**Table 4.11-8**  
**Construction Workforce by Phase**

Phase	Time Period	Duration	Estimated Number of Employees
1	2024	7 months	100 - 140
2	2024 – 2025	5 months	100 - 140
3	2024 – 2025	6 months	165 - 190
4	2025 – 2026	8 months	210 - 240
5	2025 – 2026	10 months	210 - 240
6	2025 – 2026	6 months	165 - 190
7	2026	7 months	90 - 125
8	2025 - 2027	22 months	50 - 100
<b>Total Number of Employees During Construction</b>			<b>1,090 - 1,365</b>

Source: **Appendix F: ITC Construction Scenarios**.

\* Note: Some Phase 8 activities could start as early as 2025 or when there is enough aerial structure available for the installation of equipment. However, majority of the construction activities for Phase 8 would happen between 2025 to 2026. For analysis purposes, 2025–2026 for construction duration is used.

While construction would generate a temporary workforce, construction personnel are commonly supplied by existing construction industry within the local area. Therefore, construction personnel for the proposed Project would likely be filled by existing construction employees within the City or the greater Los Angeles area. According to SCAG 2019 Local Profiles,<sup>41</sup> over 800 construction jobs currently exist in the City. As noted, these jobs are typically temporary for any specific project and the various trades and professions migrate as needed between construction sites.

<sup>41</sup> SCAG. 2019 Local Profiles. <https://www.scag.ca.gov/Documents/Inglewood.pdf>. Accessed September 7, 2021.

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The existing construction workforce estimates in the City exceeds the number of construction personnel required for each phase of the proposed Project. Approximately 411,000 construction jobs exist in the SCAG region in 2016 and the number of construction jobs is expected to increase to 536,000 construction jobs in 2045.<sup>42</sup>

The proposed Project would only require approximately 0.3 percent of the existing regional workforce for the entire duration of the construction period.

Since the construction industry does not generally have a regular place of business and construction workers are highly specialized, most construction workers would most likely commute to the job site from locations within the City and throughout the surrounding region. As such, construction personnel do not normally relocate to the location of the construction project.

Based on the existing construction workforce that resides in the City and the surrounding region, the impact on workforce to meet the needs of the proposed Project would not induce substantial population growth in the City or the region.

Impacts would be less than significant.

#### Operation

##### **Population and Housing**

As previously discussed, the proposed Project would not include any residential uses or housing development, and therefore, would have no direct impact on housing as a result. However, indirect impacts on population and housing can still occur through employment, discussed under a separate heading below, or through critical infrastructure improvements that encourage development around the improvements.

The proposed Project would expand transportation options and provide a reliable and low-cost transportation method for existing local communities. As discussed previously, the SCAG projects a growth rate of approximately 0.45 percent by 2045. The proposed Project would be crucial in reducing local roadway congestion and ensuring there is sufficient transportation capacity to accommodate future population growth. Similarly, SCAG projects the population in the region would increase from approximately 18,832,418 in 2016 to 22,507,188 in 2045, resulting in an increase of approximately 0.61 percent or approximately 115,290 population annually. As the entire ATS guideway and related facilities

<sup>42</sup> SCAG. 2020-2045 Connect SoCal Demographics And Growth Forecast. [https://www.connectsoocal.org/Documents/Draft/dConnectSoCal\\_Demographics-And-Growth-Forecast.pdf](https://www.connectsoocal.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf). Accessed September 7, 2021.

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would be located in or adjacent to disadvantaged communities, the proposed Project would provide a reliable and low-cost option for traveling within the local area and to the greater Los Angeles region, connecting job centers such as downtown Los Angeles, The Forum, and the SoFi Stadium to existing disadvantaged communities and providing economic support for these communities.

The proposed Project may generate indirect population growth through an improvement in access to housing and employment opportunities in the greater Los Angeles region. However, reasonably foreseeable growth from an improvement in access and quality of life is anticipated to be within the growth projection under SCAG's 2019 Local Profiles and within the regional projection under SCAG's 2020–2045 RTP/SCS. Furthermore, since the existing roadway network currently provides access to all areas that would benefit from the alignment in the urban setting, the proposed Project is not expected to contribute development and population growth to any new undeveloped areas. Therefore, indirect impacts to population growth through an improvement to access and quality of life would be less than significant.

#### **Employment**

The proposed Project is anticipated to have a total direct employment of up to 150 full-time equivalent people. This would include workforce requirements for the operation and maintenance necessary for the proposed Project, including system engineers, operators, maintenance personnel, janitorial crews, security, and other jobs. These jobs would extend beyond construction and into oversight of long-term operations.

The proposed Project would also require the replacement of certain existing uses in order to accommodate various Project components. Existing sites to be replaced include the commercial/retail center at the southeast corner of Florence Avenue and Market Street that would be removed for the Market Street/Florence Avenue station, the office uses at the southwest corner of Prairie Avenue and Manchester Boulevard, the commercial/retail space at the northwest corner of Prairie Avenue and Hardy Street, the commercial uses at 500 and 510 Manchester Boulevard that would be removed for the proposed MSF, other than the commercial uses at 500 E. Manchester Boulevard that would be replaced when the new Vons store is built and opened, and the commercial building that would be removed to allow for the encroachment of the guideway at 150 S. Market Street. As discussed previously, the existing work force to be removed includes 464 employees, not including the existing Vons store which would be replaced prior to construction of the proposed Project.

The proposed Project would provide funding for the support and transition of jobs through the California Climate Investments (CCI) which facilitate GHG emission reductions and deliver a suite of economic, environmental, and public health co-benefits, including job co-benefits. The job co-benefits refer to California jobs supported, not created, by CCI. A job is defined as one full-time equivalent (FTE) employee

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position over one year, equal to approximately 2,000 hours of work. Jobs supported by CCI include direct, indirect, and induced employment.<sup>43,44</sup> The Job Co-benefit Modeling Tool was created by the California Air Resources Board using regional input-output models to characterize the relationships between all industries in an economy, with the foundational assumption that an initial change in economic activity prompts additional spending. For instance, increased demand for the outputs of one industry generates demand for intermediate inputs from supporting industries. Greater employment and earnings in the affected industries lead to higher household spending, resulting in additional demand for goods and services throughout the region.

In 2009, the University of Utah's Metropolitan Research Center reviewed a wide set of literature and data on the job and economic impacts of transportation spending and reported five conclusions relevant to choosing transportation stimulus projects.<sup>45</sup> The key findings included investing in areas with high job needs improves employment faster than investing elsewhere. Putting or keeping public transportation in communities with high unemployment produces up to 2.5 times more jobs than putting public transportation in communities with low unemployment. CCI facilitate GHG emission reductions and deliver a suite of economic, environmental, and public health co-benefits, including job co-benefits.<sup>46</sup> A different mix of spending on materials, equipment, and labor is expected across various CCI project types and match funding arrangements. As such, some project types would support more jobs than others.

The proposed Project provided project inputs for assessment using the Job Co-benefit Modelling Tool under transit mode. The project input categories include the following:<sup>47</sup>

- The type of region that best encompasses the geographic location for the proposed Project type;
- TIRCP Funds Requested (\$)/Total amount of TIRCP GGRF funds requested from this solicitation to implement the project;
- Total Project Cost (\$) or Total amount of funding required to implement the project;

43 California Air Resources Board. CCI Co-benefit Assessment Methodologies. Job Co-Benefit Assessment Methodology. <https://ww2.arb.ca.gov/resources/documents/cci-methodologies>. Accessed 09/7/2021.

44 The three types of jobs supported by CCI are the following- Directly supported jobs refer to labor to complete California Climate Investments projects, through direct employment or contracted work paid with GGRF dollars; Indirectly supported jobs exist in the supply chains supporting California Climate Investments projects. Funding a project generates demand for intermediate inputs of materials and equipment needed to complete the project, leading to expanded production and employment in the relevant upstream industries; Induced jobs are linked to the spending of income from directly and indirectly supported jobs. The personal consumption expenditures of workers in jobs directly and indirectly supported by California Climate Investments projects (i.e., increased household spending) stimulate demand for goods and services in the wider California economy.

45 Arthur C. Nelson et al., *The Best Stimulus for the Money: Briefing Papers on the Economics of Transportation Spending*, University of Utah's Metropolitan Research Center and Smart Growth America, April 2009. <https://smarthgrowthamerica.org/wp-content/uploads/2016/08/thebeststimulus.pdf>.

46 California Climate Change Investments, *About Climate Change Investments*. <http://www.caclimateinvestments.ca.gov/about-cci> accessed September 7, 2021.

47 City of Inglewood. Inglewood Transit Connector TIRCP Grant Application. January 16, 2020.

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- The first year of service or the first year the facility or rolling stock would be in use;
- The final year of service or the final year the facility or rolling stock's useful life;
- The increase in unlinked passenger trips directly associated with the proposed Project in the first year;
- The increase in unlinked passenger trips directly associated with the proposed Project in the final year;
- Discount factor applied to annual ridership to account for transit-dependent riders; and the
- Annual passenger miles over unlinked trips directly associated with the proposed Project.

Calculation based on project inputs generated approximately 11,516 full time equivalent jobs which would be benefitted through these funds and programs. The benefits would be provided through either directly supported jobs, indirectly supported jobs, or induced jobs. Estimated jobs supported by the CCI through the proposed Project are set forth in the **Table 4.11-9: Estimated Job Co-Benefits**.<sup>48</sup>

**Table 4.11-9  
Estimated Job Co-Benefits**

Category	Number of Jobs Co-Benefits
Total Full-Time Equivalent Jobs Supported by Project Budget	9,759
Total Full-Time Equivalent Jobs Supported by the Project GGRF* Funds	878
Full-Time Equivalent Jobs Directly Supported by the Project GGRF* Funds	413
Full-Time Equivalent Jobs Indirectly Supported by the Project GGRF* Funds	190
Full-Time Equivalent Induced Jobs Supported by the Project GGRF* Funds	276
<b>Total Number of Jobs Supported</b>	<b>11,516</b>

\*Greenhouse Gas Reduction Funds  
Source: City of Inglewood. *Transit and Intercity Rail Program Application for the Inglewood Transit Connector Project* January 2020.

The proposed Project would directly generate approximately 150 full-time jobs associated with the operation and maintenance of the ATS trains and would indirectly contribute to the creation of 11,516 additional jobs. As described above, the proposed Project may also displace up to 464 jobs associated with uses that would be removed on properties to be acquired as part of the Project if these uses do not relocate within the City. This would result in the Project directly and indirectly creating approximately net 11,052<sup>49</sup> FTE jobs. Furthermore, ongoing, and planned development along the proposed ATS alignment as described in **Section 4.0, 4.0-5: Adjusted Baseline**, including development in the HPSP area would also benefit from the implementation of the proposed Project. The growth in employment associated with the Adjusted Baseline growth would offset any net loss of jobs resulting from the proposed Project.

48 City of Inglewood. *Transit and Intercity Rail Program Application for the Inglewood Transit Connector Project*. January 2020.

49 11,516 minus 464 in numbers of jobs displaced.

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As previously discussed, approximately 92 percent of the residents in the City currently commute to work outside of the City, with the remaining 8 percent of residents working within the City (Table 4.11-5). This pattern points to a regional spread in work locations for the City residents. Because of this, local fluctuations in job generation are unlikely to directly impact population growth within the City. Even though the proposed Project would either directly or indirectly support 11,052 jobs, the implementation of the proposed Project would only directly create 150 full-time equivalent jobs. Therefore, not all jobs supported by the proposed Project would translate into an increase in population growth for the local area or the region.

Additionally, according to SCAG 2020–2045 RTP/SCS, approximately 8,389,000 jobs were available in 2016 across industries in the region and the number of jobs available would increase to 10,050,000 by 2045, an increase of approximately 0.62 percent or approximately 52,700 annually in jobs.<sup>50</sup> The proposed Project would provide benefits to approximately 0.13 percent of the jobs in the region based on the 2016 jobs number or approximately 20 percent of new jobs added to the region annually. The jobs that would be supported by the proposed Project in the region is within the regional trends provided by the SCAG 2020–2045 RTP/SCS data and the jobs that would benefit from the proposed Project does not directly translate into population growth.

Based on SCAG's growth estimates<sup>51</sup> an adequate workforce exists and is projected to remain in existence, creating capacity to meet the employment needs of the proposed Project during operation. Further, with the current development of new employment opportunities in the City as well as the region, displacement of any existing workers would be absorbed.

Additionally, any businesses displaced would be compensated in accordance with California Government Code Section 7260-7277, the California Relocation Assistance Program. Compensation and compliance with the California Relocation Assistance Program would further minimize the effect of business displacement on business owners and the local community. As such, the estimate of up to 464 jobs that may be displaced from the proposed Project is a maximum estimate and would likely be less due to relocation of existing uses under the California Relocation Assistance program. It is important to note economic and social effects of a project are not treated as significant effects on the environment as stated previously per CEQA Guidelines Section 15131(a). Nonetheless, the changes in employment identified in this section are used to trace a chain of cause and effect from a proposed decision on a project through

51 SCAG. 2020-2045 Connect SoCal Demographics And Growth Forecast. [https://www.connectsocial.org/Documents/Draft/dConnectSoCal\\_Demographics-And-Growth-Forecast.pdf](https://www.connectsocial.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf). Accessed September 7, 2021.  
51 SCAG. 2020-2045 Connect SoCal Demographics And Growth Forecast. [https://www.connectsocial.org/Documents/Draft/dConnectSoCal\\_Demographics-And-Growth-Forecast.pdf](https://www.connectsocial.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf). Accessed September 7, 2021.

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anticipated economic or social changes resulting from the project to physical changes, such as population growth.

As a result of this analysis, the proposed Project would not substantially induce population growth beyond the regionally projected value. Therefore, there is a less than significant impact on employment and population growth from the operation of the proposed Project.

#### Summary of Impacts

The proposed Project does not include any constructing or removing any residential uses or housing developments. Therefore, construction of the proposed Project would not directly contribute to population increase or an increase or loss of housing stock.

Construction activities would generate a temporary workforce for the duration of the construction period. However, due to the temporary and variable nature of construction activities, construction would not create temporary or permanent population increase at the City. Additionally, construction workforce needs for the proposed Project could be met by the existing local work force and would not contribute to population increase through relocation. Therefore, construction employment would not result in any significant impacts in terms of population increase.

Employment generated by the operation of the proposed Project would be less than the current jobs displaced for uses that would be removed. However, the proposed Project would either directly or indirectly benefit 11,052 jobs. The number of jobs that would be supported by the proposed Project is within the growth projections provided by existing studies. Therefore, operational impacts on substantially inducing employment and population growth is less than significant.

Impacts from construction and operation on substantially inducing population and employment growth would be less than significant.

#### Mitigation Measures

No mitigation is required.

#### Level of Significance after Mitigation

The proposed Project would have a less than significant impact on inducing substantial population or employment growth. Impacts would be less than significant.

#### 4.11.8 CUMULATIVE IMPACTS

Cumulative impact analysis for population, employment, and housing considers whether the impacts of a project and related projects, when taken as a whole, would induce substantial unplanned population growth. The geographic scope of this cumulative impact analysis is the City and the region. If the

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cumulative projects listed in **Section 4.0, 4.0.6: Cumulative Assumptions** would result in a significant impact, then the proposed Project's contribution would need to be determined. The proposed Project would not directly create population or employment growth in the City or region. The proposed Project does not include residential elements or housing development which would directly contribute to population growth. Moreover, related projects and the additional growth considered as part of the Adjusted Baseline is consistent with the City's approved land use plans and approved projects. As discussed above, the City is currently coordinating with SCAG to update the RTP/SCS socio-economic data to reflect the growth anticipated in the City's New Downtown Inglewood and Fairview Heights Transit Oriented Development Plan and Hollywood Park Specific Plan Areas.

Since the proposed Project would not significantly induce population, employment, or housing growth in the region, the proposed Project would not substantially contribute to cumulative population, employment, or housing growth in the area. The proposed Project, combined with other reasonably probable future related development would not result in a significant cumulative impact related to population, employment, and housing because the cumulative growth would not exceed the growth anticipated in City-wide and regional planning documents, including the 2020–2045 RTP/SCS.

#### 4.11.9 CONSISTENCY WITH CITY OF INGLEWOOD GENERAL PLAN

The City's General Plan contains goals within its Housing Element and Land Use Element that relates to the population, employment, and housing resources.

##### Housing Element

The Housing Element for the City<sup>52</sup> establishes policies to create and preserve quality residential neighborhoods along with establishing policies and programs to mitigate housing shortages. The following goals within the Housing Element directly relates to population, employment, and housing resources within the City:

- Goal 2:** Maintain the existing housing stock and neighborhoods by promoting the maintenance, rehabilitation, modernization, and energy efficient upgrades of existing housing as well as the beautification and security of residential neighborhoods.
- Goal 3:** Encourage the Production and Preservation of Housing for All Income Categories, particularly around high-quality transit, including workers in the City that provide goods and services.
- Goal 7:** Encourage Energy Efficiency and Greenhouse Gas Reductions.

<sup>52</sup> City of Inglewood. *Housing Element 2013-2021*. <https://www.cityofinglewood.org/DocumentCenter/View/127/2013-2021-Housing-Element-Adopted-January-28-2014-PDF>. Accessed September 7, 2021.

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Goals 2 and 3 relate directly to housing production, preservation, and upgrades. Since the proposed Project does not include any residential uses, housing development, or removal of existing housing stock, Goals 2 and 3 do not apply.

The proposed Project aligns with Goal 7 in improving local mass transit availability and providing transit to local neighborhoods, encouraging energy efficiency and greenhouse gas reduction by providing an alternative to travelling by automobiles. As such, the proposed Project is consistent with this goal.

##### Land Use Element

The Land Use Element for the City<sup>53</sup> also contains goals that apply to population, employment, and housing. The goals relating to population, employment and housing are listed below:

##### General

- Goal:** Help promote sound economic development and increase employment opportunities for the City's residents by responding to changing economic conditions.
- Goal:** Develop a land use element that facilitates the efficient use of land for conservation, development, and redevelopment.
- Goal:** Promote Inglewood's image and identify as an independent community within the Los Angeles Metropolitan area.

##### Commercial

- Goal:** Create and maintain a healthy economic condition within the present business community and assist new business to located within the City.
- Goal:** Protect local businessmen and encourage the importance of maintaining a strong commercial district in the downtown.
- Goal:** Promote the development of commercial/recreational uses which would complement those which already are located in Inglewood.

##### Downtown Transit Oriented District

- Goal 1:** Downtown is a place to live, work, shop, recreate, and be entertained.
- Goal 3:** Downtown provides a unique mix of accessibility options including light rail, pedestrians, bicycles, autos, buses, and advanced technology local transit.

<sup>53</sup> City of Inglewood. *Land Use Element*. <https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-PDF>. Accessed September 7, 2021.

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**Goal 4:** Downtown is a major economic engine providing jobs, sales tax, and other revenues.

**Goal 5:** Downtown is a model for sustainable development.

The proposed Project is consistent with the Land Use Element goals by enhancing connectivity for the new commercial and residential developments. The proposed Project would provide a mass transit connection within the City and the new LASED and HPSF, as well as connect them to the broader region and the Metro K Line. The location of the proposed Project in the City's downtown area along Market Street would assist in encouraging the importance of maintaining a strong commercial district in the downtown area.

The proposed Project would connect the Metro K line with new commercial and entertainment developments in the City such as LASED, Sofi Stadium, and the Hollywood Park Specific Plan mixed-use development, promoting these entertainment and commercial developments to the region. The connection to entertainment, commercial, and residential developments would also assist in reducing future impacts associated with traffic, air quality, greenhouse gas, and noise from employees and patrons of these uses. Increasing existing mobility options would also remove vehicle traffic in downtown Inglewood, promoting sustainable development values.

#### Environmental Justice Element

The City's Environmental Justice Element<sup>54</sup> was adopted on June 30, 2020. Applicable Environmental Justice goals for the Population, Employment, and Housing section are as follows:

**Goal:** The community's exposure to pollution in the environment is minimized through sound planning and public decision making.

**Goal:** Adequate and equitably distributed public facilities are available in the community.

The proposed Project is consistent with the Environmental Justice Element goals through the reduction in community exposure to air pollutants by reducing VMT and vehicle related air pollutant emissions and providing adequate and equitably distributed public facilities in the community. The proposed Project would provide public transportation services to the local community from Downtown Inglewood to south Inglewood and connect the communities from Inglewood to the larger Los Angeles area through the connection with Metro K line.

<sup>54</sup> City of Inglewood. *Environmental Justice Element*. <https://www.cityofinglewood.org/DocumentCenter/View/14211/Environmental-Justice-Element#:~:text=The%20Inglewood%20General%20Plan%20Environmental,City%2C%20particularly%20for%20disadvantaged%20communities.> Accessed September 7, 2021.

## 4.12 TRANSPORTATION

### 4.12.1 INTRODUCTION

This section of the Recirculated Draft Environmental Impact Report (Recirculated Draft EIR) evaluates the surface transportation and circulation system in the Project area and the potential for the construction and operation of the proposed Inglewood Transit Connector Project (proposed Project or ITC Project) to result in transportation impacts. The assessment of transportation and circulation system impacts considers the existing traffic conditions, including existing street system, public transit service, and bicycle facilities, which may be affected by the ITC Project. The ITC Project is proposed to increase use of transit, reduce vehicle trips, and reduce per-capita vehicle miles traveled (VMT) associated with travel to and from the City's major housing, employment, and activity centers, with corresponding improvements in air quality, public health, and reductions in greenhouse gas emissions from transportation sources.

After circulation of the December 2020 Draft EIR for public review, the City revised the design of the Project in response to consultation with key stakeholders in the community and comments received on the Draft EIR. Changes to the Project relevant to the potential effects of the Project on transportation and traffic include further definition of Project design features in the Construction Commitment Program addressing the transit and access program, construction staging and traffic control program, preliminary haul and overload routes, passenger access program, and Parking Management Plan as described below in *Section 4.12.5.1: Project Design Features*.

Specific changes to the Project related to transportation include refinement of the construction phasing, relocating the Prairie Avenue/Pincay Drive Station to the southwest corner of Prairie Avenue and Manchester Boulevard, redesign of the proposed MSF to allow this facility to be located on the proposed site with a new Vons store, and realignment of the guideway and stations on Prairie Avenue to the west side of Prairie Avenue. The transportation analysis in this section has been updated to reflect these changes to the project. Additional updates to the transportation analysis from the December 2020 Draft EIR include updates to the vehicle miles traveled (VMT) analysis, daily traffic volumes, existing transit frequency minutes during peak commute hours, and construction transportation analysis to reflect the more specific phases of construction compared to simpler phases presented in the December 2020 Draft EIR. The changes and revisions to the ITC Project and the transportation analysis do not alter the level of significance of any transportation impacts previously disclosed in the December 2020 Draft EIR.

Transportation impacts are analyzed for both construction and operations of the proposed Project. Transportation impacts are analyzed using a variety of modeling techniques detailed within **Appendix O: Transportation Assessment Study**.

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Recirculated Draft EIR.

#### 4.12.2 REGULATORY FRAMEWORK

State, regional, and local laws, regulations, and policies pertaining to traffic and transportation in the Project area are summarized here. These provide the regulatory framework for addressing all aspects of transportation, planning, and infrastructure that would be affected by implementation of the proposed Project.

##### 4.12.2.1 State Regulations and Directives

###### **Senate Bill 743**

Senate Bill (SB) 743, passed in 2013, required that the California Governor’s Office of Planning and Research (OPR) develop new California Environmental Quality Act (CEQA) guidelines that address traffic performance metrics. Per the legislation, “automobile delay characterized solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment.”

The Natural Resources Agency subsequently adopted CEQA Guidelines Section 15064.3. Under this guideline, VMT was chosen as the most appropriate performance metric used to identify transportation impacts.

The primary goals of SB 743 are:

1. Reduction of Greenhouse Gas (GHG) emissions
2. Development of multimodal transportation networks; and
3. A diversity of land uses (mixed use development)

In December 2018, OPR published final technical guidance for implementing SB 743. The latest OPR technical guidance<sup>1</sup> specifically states that:

*Transit and Active Transportation Projects generally reduce VMTs and therefore are presumed to cause a less-than-significant impact on transportation. This presumption may apply to all passenger rail projects, bus and bus rapid transit projects, bicycle, and passenger infrastructure projects. Streamlining transit and other active transportation projects align with each of the statutory goals contained in SB 743 by reducing GHG emissions, increasing multimodal networks and facilitating mixed-use development.*

<sup>1</sup> Governor’s Office of Planning and Research. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. December 2018.

#### **Assembly Bill 1358**

Assembly Bill (AB) 1358, and the Complete Streets Act of 2008 require that cities and counties identify how they will provide for the routine accommodation of all users of roadways, including motorists, passengers, bicyclists, individuals with disabilities, seniors, and users of public transportation. Planning and building complete streets is one way that cities and counties can meet this requirement. A complete street is a transportation facility that is planned, designed, operated, and maintained to enable safe access for all roadway users. Passengers, bicyclists, motorists, and transit riders of all ages and abilities must be able to safely move along and across a complete street.

##### 4.12.2.2 Regional Regulations and Directives

###### **Southern California Association of Governments: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy**

As the metropolitan planning organization for the region’s six counties and 191 cities, Southern California Association of Governments (SCAG) develops a long-term regional transportation and sustainability plan every four years, as mandated by law. In September 2020, the Regional Council of Southern California Association of Governments adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2020–2045 RTP/SCS is a long-range visioning plan for the region’s transportation system over the next 25 years that balances mobility and housing needs with economic, environmental, and public health goals. The 2020–2045 RTP/SCS includes over 4,000 transportation projects ranging from highway improvements, railroad grade-separations, bicycle lanes, new transit hubs and replacement bridges to reduce bottlenecks, improve the efficiency of the region’s network and expand the mobility choices for everyone in the six-county southern California region.

The 2020–2045 RTP/SCS groups its goals into four core categories—economy, mobility, environment, and healthy/complete communities. The plan explicitly addresses goals associated with housing, transportation technologies, equity and resilience reflecting enhanced importance of these topics in the region linking them to potential performance measures and targets.

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The following ten goals are identified in the 2020–2045 RTP/SCS:

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

4.12.2.3 Local Regulations and Directives

City of Inglewood Circulation Element

As part of the General Plan, the City adopted a Circulation Element in December 1992. The Circulation Element works to ensure that adequate street access and traffic capacity is considered for current and future land use needs. In order to accomplish this, the Circulation Element includes formal arterial and collector designations for street classifications and identifies specific street improvement efforts as needed.

City of Inglewood Environmental Justice Element

The Environmental Justice Element, adopted on June 30, 2020, provides guidelines to minimize pollution and its effects on the community, and ensure that all residents have a say in decisions that may affect their quality of life. Goals and policies applicable to the transportation planning are identified below:

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Goal 2: The community’s exposure to pollution in the environment is minimized through sound planning and public decision making.

Policy: General Environmental Health

- EJ-2.4: Create land use patterns and public amenities that encourage people to walk, bicycle and use public transit.
  - EJ-2.5: Concentrate medium to high density residential development in mixed-use and commercial zones that can be served by transit.
  - EJ-2.7: Regularly update IMC Chapter 12 Transportation Demand Management requirements to reflect current transportation technologies in support of alternative modes of transportation.
  - EJ-2.8: Encourage new development to reduce vehicle miles traveled to reduce pollutant emissions.
- Goal 6: Adequate and equitably distributed public facilities are available in the community.
- EJ-6.2: Prioritize the City’s capital improvement program to address the needs of disadvantaged communities.
  - EJ-6.3: Plan for the future public improvement and service needs of underserved communities.
  - EJ-6.8: Ensure that new public facilities are well designed, energy efficient and compatible with adjacent land uses.
  - EJ-6.10: Coordinate with the Inglewood Unified School District, transit agencies and other public agencies to provide adequate public facilities, improvements, and programs to the City of Inglewood.

City of Inglewood Land Use Element

The Land Use Element<sup>2</sup> also includes goals related to the City’s transportation system, including the following:

- Goal: Ensure that proposed new uses can be accommodated by adequate and safe streets.
- Goal: Promote and support adequate public transportation within the City and the region.
- Goal: Develop modified traffic systems that would discourage through traffic from utilizing neighborhood streets.
- Goal: Develop a safe and adequate passenger circulation system which is barrier-free for the handicapped.

<sup>2</sup> City of Inglewood General Plan, “Land Use Element” (1980).

### Imagine Inglewood

The City of Inglewood is in the process of developing *Imagine Inglewood*, an Active Transportation Plan (ATP) that incorporates bicycle, passenger, Americans with Disabilities Act (ADA) considerations and Safe Routes to School (SRTS) analysis and planning. The ATP is intended to improve access and increase public transit connections to the rest of the Los Angeles region to promote improvements that encourage the community to walk, bike, or take a bus.<sup>3</sup> The City is currently engaging community stakeholders in order to further develop ATP goals and initiatives.

#### 4.12.3 EXISTING CONDITIONS

As shown in **Figure 4.12-1: Study Area**, the study area is generally bounded by Florence Avenue on the north, Lennox Boulevard – 108th Street on the south, La Brea Avenue – Hawthorne Boulevard on the west, and Van Ness Avenue on the east. The study area includes major corridors providing access to the proposed Project, encompassing approximately 6 square miles. The existing street system in the vicinity of the study area consists of a regional roadway system including freeways, major and minor arterials and a local street system including collectors and local streets. The freeway network providing access to and from the study area includes the San Diego (I-405) Freeway, the Glenn M. Anderson (I-105) Freeway and the Harbor (I-110) Freeway as shown in **Figure 4.12-2: Freeways in Study Area**. The Average Daily Traffic volume (ADT) estimates at all roadway facilities within approximately ½ mile from the proposed Project alignment have also been prepared for all analysis scenarios, discussed further below, to quantify the potential reduction in ADTs with the ITC Project.

##### 4.12.3.1 Existing Street System

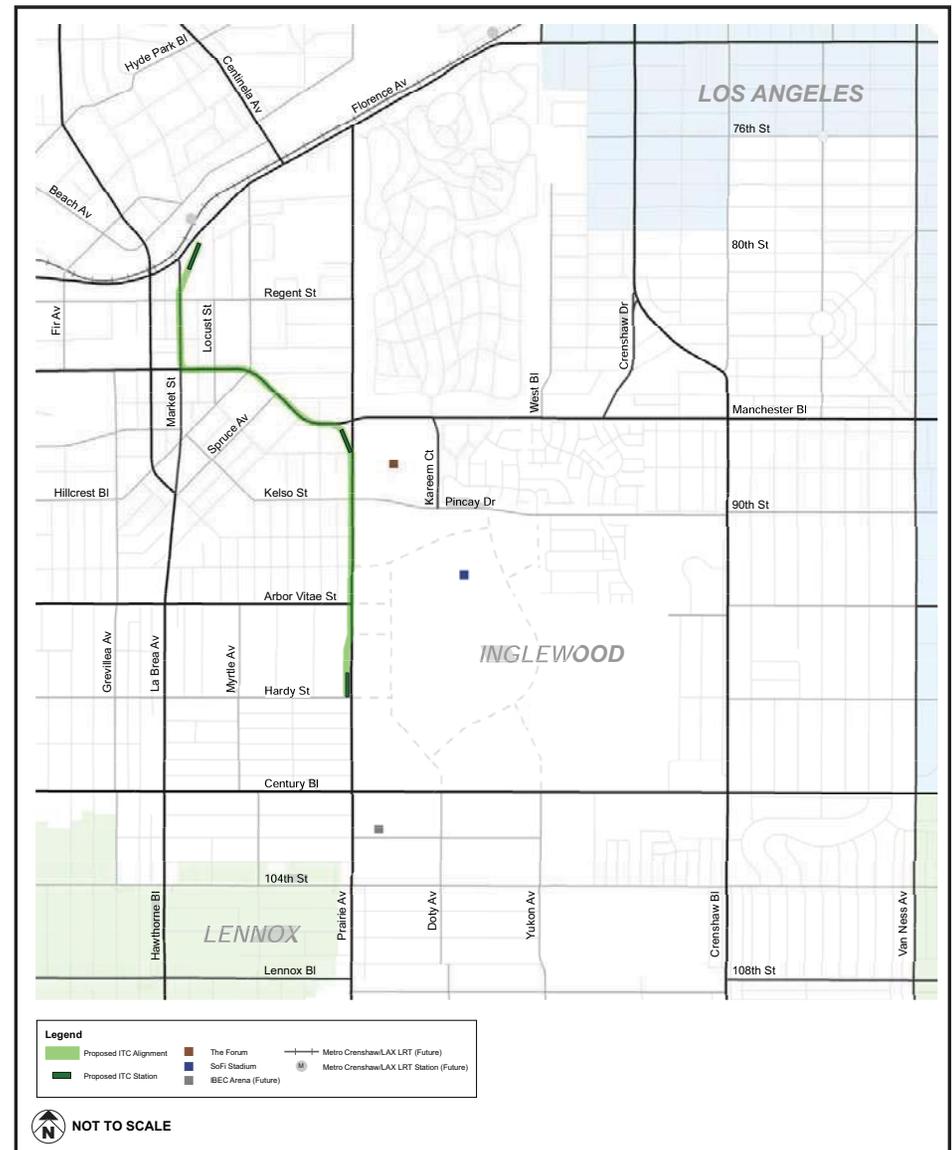
The existing street system within and near the study area consists of a regional roadway system including freeways, major and minor arterials and a local street system including collectors and local streets. The freeway network providing access to and from the study area includes of the San Diego (I-405) Freeway, the Glenn M. Anderson (I-105) Freeway, and the Harbor (I-110) Freeway.

Brief descriptions of these facilities and additional collectors and local streets serving the study area including number of lanes, speed limits, parking availability, and functional classes are provided below.

##### Freeways

- **San Diego (I-405) Freeway** – The I-405 Freeway is a north-south freeway that transverses the Southern California region from its northern terminus at the I-5 Freeway in Sylmar to its southern terminus at the I-5 Freeway in Irvine. In the vicinity of the study area, this freeway provides six lanes (including one HOV lane) in each direction. There are ramps at Manchester Boulevard, La Cienega Boulevard, Century Boulevard, Imperial Highway, I-105 Freeway in the vicinity of the study area.

3 City of Inglewood, *Imagine Inglewood*, <http://www.imagineinglewood.com/>, accessed October 19, 2021.



SOURCE: Raju Associates, Inc. – September 2021

FIGURE 4.12-1





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travel lanes in each direction plus left-turn channelization at major intersections. Parking is generally allowed along this roadway, and the posted speed limit is 40 mph.

- **Florence Avenue** – Florence Avenue is classified as a major arterial in the City of Inglewood and as a secondary arterial (Avenue I) in the City of Los Angeles. It runs east-west with two to three lanes in each direction with left-turn channelization at major intersections through the study area. Parking is generally not allowed along this roadway, although some parking is permitted east of West Boulevard. Bike lanes are provided along some stretches of this roadway between Locust Street and West Boulevard. The posted speed limit is 40 mph west of West Boulevard and 35 mph east of West Boulevard.
- **Manchester Boulevard** – Manchester Boulevard is classified as a major arterial roadway in the study area. It runs east-west and has generally two lanes in each direction west of Prairie Avenue and three lanes in each direction east of Prairie Avenue, plus left-turn channelization at major intersections through the study area. Parking is allowed along most of Manchester Boulevard with some restricted segments. The posted speed limit along Manchester Boulevard is 35 mph west of Prairie Avenue and 40 mph east of Prairie Avenue. Manchester Boulevard provides access to the I-405 Freeway and I-110 Freeway.
- **Arbor Vitae Street** – Arbor Vitae Street west of Prairie Avenue is classified as a major arterial roadway that runs in an east-west direction. Arbor Vitae Street between Prairie Avenue and Van Ness Avenue is classified as a collector roadway. Within the study area, this roadway west of Prairie Avenue generally provides one to two lanes in each direction with parking on both sides of the street. The posted speed limit is 35 mph.
- **Century Boulevard** – Century Boulevard is classified as a major arterial roadway in the study area and runs in an east-west direction. It provides one of the major direct access options into the LAX Central Terminal Area (CTA). Within the study area, this roadway generally provides three to four lanes in each direction with left-turn lanes at key intersections. The posted speed limit is 40 mph. There is no parking allowed on either side of the street within the study area. Century Boulevard provides access to the I-405 Freeway and I-110 Freeway.

#### Minor Arterial / Secondary Arterial

- **Market Street** – Market Street is classified as a minor arterial roadway and runs in a north-south direction, beginning at Florence Avenue and terminating at La Brea Avenue. This roadway provides one lane in each direction between Florence Avenue and Hillcrest Boulevard, and two lanes in each direction between Hillcrest Boulevard and La Brea Avenue. On-street parking is permitted on both sides of the street. The prima facie speed limit is 25 mph.

#### Collectors & Local Streets

- **Locust Street** – Locust Street runs in a north-south direction beginning at Florence Avenue and terminating at the intersection of Hillcrest Boulevard and Nutwood Street. The roadway is classified as a collector roadway between Regent Street and Hillcrest Boulevard, and as a local street between Florence Avenue and Regent Street. This roadway provides one lane in each direction, with on-street

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parking generally permitted on both sides of the street. Bike lanes are generally provided on both sides of the street between Florence Avenue and Manchester Boulevard. The posted speed limit is 30 mph.

- **Myrtle Avenue** – Myrtle Avenue is a north-south roadway that is classified as a collector roadway between Arbor Vitae Street and Century Boulevard, and as a local street between Kelso Street and Arbor Vitae Street. This roadway generally provides one lane in each direction, with on-street parking available on both sides of the street. The posted speed limit is 30 mph.
- **Doty Avenue** – Doty Avenue is a north-south roadway that is classified as a collector roadway. The roadway provides one lane in each direction. On-street parking is available on both sides of the street south of 102nd Street. The prima facie speed limit is 25 mph.
- **Yukon Avenue** – Yukon Avenue is a north-south roadway that is classified as a collector roadway. The roadway generally provides one to two lanes in each direction. On-street parking is available on the west side along some restricted segments in the study area. The posted speed limit is 30 mph.
- **Regent Street** – Regent Street is classified as a collector roadway and runs in an east-west direction, beginning west of Oak Street and terminating at Inglewood Park Cemetery. This roadway provides one lane in each direction with on-street parking available between La Brea Avenue and Prairie Avenue. It provides two lanes in each direction with on-street parking prohibited between Fir Avenue and La Brea Avenue. The posted speed limit is 35 mph.
- **Hillcrest Boulevard** – Hillcrest Boulevard is classified as a collector roadway. It runs in an east-west direction between Aviation Boulevard and Grevillea Avenue, diagonally between Grevillea Avenue and Manchester Boulevard, and in a north-south direction between Manchester Boulevard and Florence Avenue. Within the study area, Hillcrest Boulevard generally provides one travel lane in each direction and has on-street parking on both sides of the street. The posted speed limit is 30 mph.
- **Spruce Avenue** – Spruce Avenue is classified as a collector roadway that runs diagonally between La Brea Avenue and Manchester Boulevard and runs in an east-west direction between Hindry Avenue and Fir Avenue. This roadway generally provides one lane in each direction with on-street parking on both sides of the street. The prima facie speed limit is 25 mph.
- **Kelso Street** – Kelso Street runs generally in an east-west direction and is classified as a collector roadway. It runs diagonally between Market Street and Myrtle Avenue. The roadway ends at Prairie Avenue where the street name changes to Pincay Drive. This roadway generally provides one lane in each direction with on-street parking on both sides of the street. The prima facie speed limit is 25 mph.
- **Pincay Drive** – Pincay Drive is classified as a collector roadway that begins at Prairie Avenue and ends at Crenshaw Boulevard where the street name changes to 90th Street. It runs in an east-west direction. This roadway generally provides two lanes in each direction. On-street parking is available on the south side of the street between Carlton Drive and Crenshaw Boulevard. The posted speed limit is 45 mph.
- **Hardy Street** – Hardy Street is classified as a collector roadway that runs in an east-west direction. West of the Los Angeles Sports and Entertainment District (LASED), it begins at Inglewood Boulevard and terminates at Prairie Avenue. East of LASED, it begins at Crenshaw Boulevard and ends at Van Ness

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Avenue. Hardy Street is discontinuous between Prairie Avenue and Crenshaw Boulevard. This roadway generally provides one lane in each direction with on-street parking available on both sides of the street. The posted speed limit is 30 mph.

- **Queen Street** – Queen Street is a local street that runs in an east-west direction. The roadway provides one lane in each direction with on-street parking available on both sides of the street. The posted speed limit is 25 mph.

4.12.3.2 Existing Average Daily Traffic Volumes

Seventy-five (75) segments within the study area were identified as key roadway segments for evaluation. The existing ADT on roadway segments were estimated using the Inglewood Travel Demand Forecasting (ITDF) Model for four time periods: Morning Peak Hour (AM), Midday (MD), Evening Peak Hour (PM) and Nighttime (NT).

The ITDF, which is based on the SCAG Regional Travel Demand Model, was used to forecast the number daily trips on the roadway system. The SCAG 2020-2045 RTP/SCS socio-economic data was used as the base input and updated to include all the growth associated with the related projects. The ITDF Model, similar in structure to the SCAG Regional Travel Demand Model involves four-step models including Trip Generation, Trip Distribution, Mode Split, and Traffic Assignment procedures.

The results for all four time periods were aggregated to reflect the average daily conditions. The resulting ADT volumes, which reflect typical weekday operations under existing (2020) conditions, are presented in

Table 4.12-1: Weekday Daily Traffic Volumes – Existing Conditions.

Table 4.12-1 Weekday Daily Traffic Volumes – Existing Conditions				
Street	Facility Type	Segment		Existing ADT
		From	To	
<b>North/South Streets</b>				
La Brea Av	Major Arterial	Hyde Park Bl	Florence Av	20,930
		Florence Av	Manchester Bl	24,598
		Manchester Bl	Spruce Av/Market St	19,252
		Spruce Av/Market St	Arbor Vitae St	24,819
		Arbor Vitae St	Hardy St	28,459
Hawthorne Bl	Major Arterial	Hardy St	Century Bl	29,570
		Century Bl	104th St	43,049
		104th St	Lennox Bl	48,127
Prairie Av	Major Arterial	Florence Av	Regent St	21,787
		Regent St	Manchester Bl	21,853
		Manchester Bl	Pincay Dr/Kelso St	28,283

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Street	Facility Type	Segment		Existing ADT
		From	To	
Crenshaw Bl	Major Arterial	Pincay Dr/Kelso St	Arbor Vitae St	37,215
		Arbor Vitae St	Hardy St	30,516
		Hardy St	97th St	32,712
		97th St	Century Bl	32,712
		Century Bl	102nd St	29,893
		102nd St	104th St	30,586
		104th St	Lennox Bl	31,691
		80th St	Manchester Bl	23,440
		Manchester Bl	Pincay Dr/90th St	25,921
		Pincay Dr/90th St	Arbor Vitae St	31,523
Market St	Minor Arterial	Arbor Vitae St	Hardy St	30,078
		Hardy St	Century Bl	30,794
		Century Bl	104th St	27,245
		Florence Av	Regent St	3,153
Myrtle Av	Collector	Regent St	Manchester Bl	7,764
		Arbor Vitae St	Hardy St	3,832
Doty Av	Collector	Century Bl	104th St	4,950
Yukon Av	Collector	Century Bl	104th St	10,123
Locust St	Collector	Florence Av	Manchester Bl	3,677
<b>East/West Streets</b>				
Centinela Av	Major Arterial	Hyde Park Bl	Florence Av	25,664
		Fir Av	La Brea Av	16,710
		La Brea Av	Market St	20,923
		Market St	Centinela Av	24,293
		Centinela Av	Prairie Av	40,560
Florence Av	Major Arterial	Prairie Ave	West Bl	39,882
		Grevillea Av	La Brea Av	21,396
		La Brea Av	Market St	21,690
		Market St	Locust St	18,782
		Locust St	Hillcrest Bl	20,035
		Hillcrest Bl	Spruce Av	24,352
		Spruce Av	Prairie Av	28,558
		Prairie Av	Kareem Ct	31,638
		Kareem Ct	Crenshaw Dr	36,400
		Crenshaw Dr	Crenshaw Bl	27,704
Arbor Vitae St	Major Arterial	Crenshaw Bl	Van Ness Av	31,036
		Grevillea Av	La Brea Av	13,506
		La Brea Av	Myrtle Av	9,066
		Myrtle Av	Prairie Av	8,205
Century Bl	Major Arterial	Grevillea Av	La Brea Av/Hawthorne Bl	50,447

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Street	Facility Type	Segment		Existing ADT
		From	To	
		La Brea Av/Hawthorne Bl	Myrtle Av	40,914
		Myrtle Av	Freeman Av	37,612
		Freeman Av	Prairie Av	32,957
		Prairie Av	Doty Av	39,615
		Doty Av	HP Casino Dr	40,253
		HP Casino Dr	Yukon Av	40,253
		Yukon Av	Club Dr	39,608
		Club Dr	Crenshaw Bl	41,542
		Crenshaw Bl	Van Ness Av	35,913
		Regent St	Collector	Grevillea Av
La Brea Av	Market St			16,068
Market St	Prairie Ave			8,174
Hillcrest Bl	Collector	Grevillea Av	La Brea Av	8,677
		La Brea Av	Market St	7,287
		Market St	Nutwood St/Locust St	9,013
		Nutwood St/Locust St	Manchester Bl	4,941
		Manchester Bl	Florence Av	7,844
Spruce Av	Collector	La Brea Av	Manchester Av	2,945
Kelso St / Pincay Dr	Collector	Spruce Av	Prairie Av	5,493
		Prairie Av	Kareem Ct	18,768
		Kareem Ct	Crenshaw Bl	14,005
Hardy St	Collector	La Brea Av	Prairie Ave	4,394
104th St	Collector	Grevillea Av	Hawthorne Bl	6,769
		Hawthorne Bl	Prairie Ave	4,031
		Prairie Av	Doty Av	3,460

Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., September 2021; refer to Table 2 (refer to Appendix O of this Recirculated Draft EIR).

Daily traffic volumes along Prairie Avenue between Florence Avenue and Lennox Boulevard range between approximately 21,800 to 37,250 vehicles per day; along Manchester Boulevard between Grevillea Avenue and Van Ness Avenue range between approximately 18,800 to 36,400 vehicles per day; and along Century Boulevard between Grevillea Avenue and Van Ness Avenue range between approximately 33,000 to 50,500 vehicles per day.

4.12.3.3 Existing Public Transit Service

Fourteen (14) bus lines provide services in the study area including thirteen bus lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro), and one bus line operated by the County

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of Los Angeles. Additionally, the Metro C Line (Green Line) is located south of the study area. These transit lines are shown in **Figure 4.12-3: Existing Transit System** and briefly described below:

- **MTA 40 – Line 40** is a local north/south line that provides service from Downtown Los Angeles to Redondo Beach and travels primarily along La Brea Avenue, Florence Avenue and Crenshaw Boulevard within the study area.
- **MTA 111 - Line 111** is a local east/west line that provides service from Norwalk to the Los Angeles International Airport and travels primarily along Arbor Vitae Street, La Brea Avenue and Florence Avenue within the study area.
- **MTA 115 - Line 115** is a local east/west line that provides service from Norwalk to Playa del Rey and travels primarily along Manchester Boulevard within the study area.
- **MTA 117 – Line 117** is a local east/west line that provides service from Downey to the LAX Bus Center and travels primarily along Century Boulevard within the study area.
- **MTA 126 - Line 126** is a local east/west line that provides service from Manhattan Beach to Hawthorne, and travels along Prairie Avenue, Lennox Boulevard, and Hawthorne Boulevard within the study area.
- **MTA 209 – Line 209** is a local north/south line that provides service from Jefferson Park to Hawthorne and travels primarily along Van Ness Avenue in the proximity of the study area.
- **MTA 210 – Line 210** is a local north/south line that provides service from Hollywood to Redondo Beach and travels primarily along Crenshaw Boulevard within the study area.
- **MTA 211/215 - Lines 211 and 215** are local north/south lines that provide service from Redondo Beach to Inglewood and travel primarily along Locust Street, Prairie Avenue, Manchester Boulevard, and Grace Avenue within the study area.
- **MTA 212/312 – Line 212** is a local north/south line that provides service from Hollywood to Hawthorne and travels primarily along La Brea Avenue, Manchester Boulevard, Prairie Avenue, Lennox Boulevard, and Hawthorn Boulevard within the study area.
- **MTA 442 – Line 442** is a north/south express line that provides service from Downtown Los Angeles to Hawthorne and travels primarily along La Brea Avenue and Manchester Boulevard within the study area. Per Metro, this line has been discontinued as of 2021.
- **MTA 607 – Line 607** is a circulator route that begins at the Inglewood Transit Center in Inglewood and goes clockwise with major stops at the intersections of Slauson Avenue / La Brea Avenue in Windsor Hills, and Crenshaw Boulevard/54th Street in Los Angeles. Per Metro, this line has been discontinued as of 2021.
- **MTA 710 – Line 710** is a north/south ‘Rapid Bus’ line that provides service from Koreatown to Redondo Beach and travels along Crenshaw Boulevard within the study area. Per Metro, this line has been discontinued as of 2021.

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- **MTA 740 – Line 740** is a north/south ‘Rapid Bus’ line that provides service from Jefferson Park to Redondo Beach and travels primarily along La Brea Avenue, Hawthorne Boulevard, Crenshaw Boulevard, and Florence Avenue within the study area. Per Metro, this line has been discontinued as of 2021.
- **Los Angeles County Lennox Link** is a circulator route that begins at Lennox Park and travels in a counter-clockwise direction along Lennox Boulevard, Burin Avenue, 111th Street, Freeman Avenue, 104th Street, Yukon Avenue, Century Boulevard, Flower Street, Hardy Street, Myrtle Avenue and La Brea Avenue.
- **Metro C Line (Green Line)** – The Metro C Line is an east/west light rail line that provides service to Norwalk, Lynwood, Willowbrook, Hawthorne, El Segundo, and Redondo Beach. The C Line’s Hawthorne / Lennox Station lies approximately 0.8 miles south of Century Boulevard.

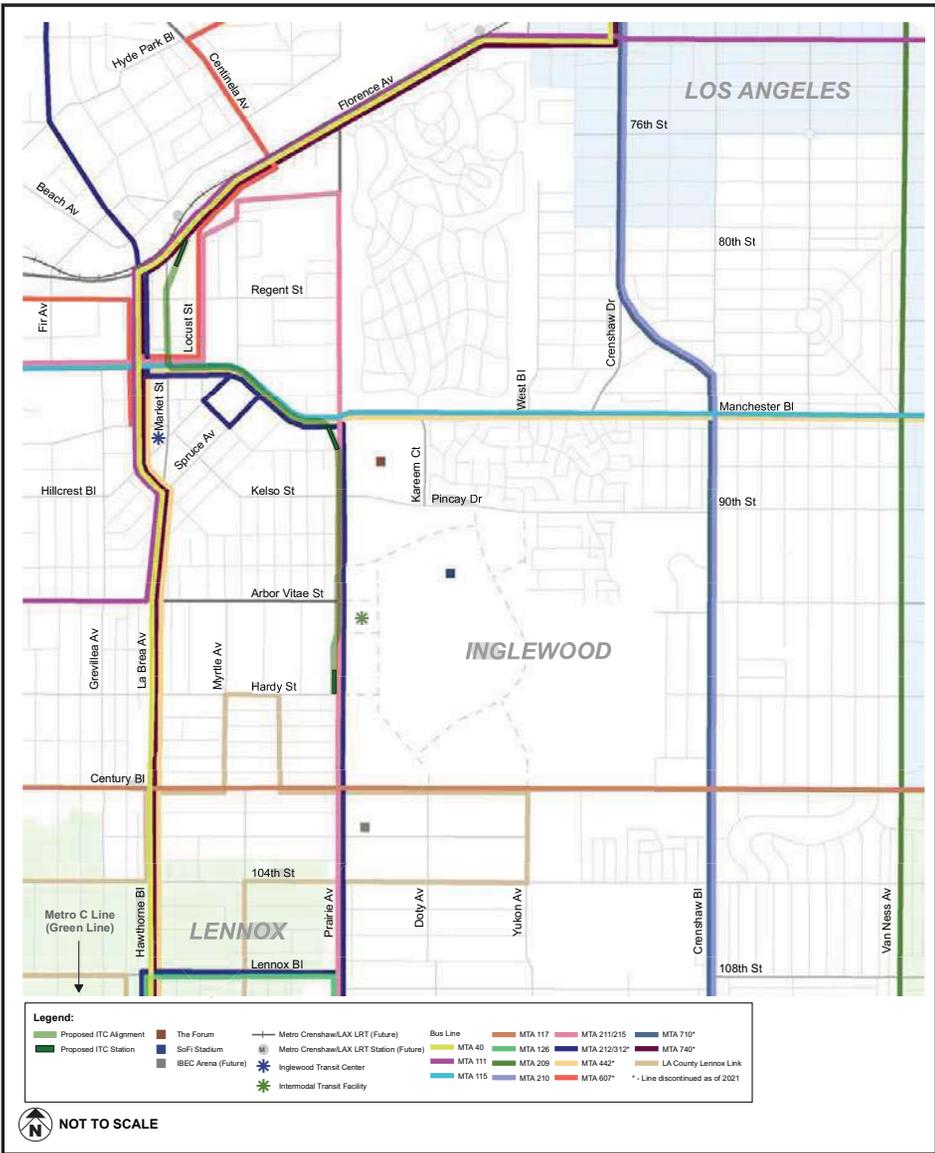
The average ridership for Metro bus lines serving the study area was compiled using data provided by Metro in 2019. Metro Bus Lines 40, 111 and 115 have an average daily bus ridership ranging from 14,561 (Line 40) to 15,653 (Line 111) passenger trips; while Metro Bus Lines 126, 209, 211/215, 442 and 607 have an average daily ridership ranging from 62 (Line 607) to 911 (Line 209) daily passengers. Additionally, Metro C Light Rail Transit (LRT) line (Green) has an average of 30,236 daily ridership.

Metro is constructing the Metro K Line from the existing Metro E Line (Exposition Line) at Crenshaw Boulevard/Exposition Boulevard, 8.5 miles south to connect with the Metro C Line (Green Line) at the Aviation/Imperial Station.

The K Line is projected to be completed and commence operations shortly. The K line includes the Fairview Heights, Downtown Inglewood, Westchester-Veteran and Crenshaw/Imperial stations. The Market Street/Florence Avenue Station will serve as the transfer point between the proposed Project and the K Line.

**Transit Ridership Along Corridors**

Transit ridership data for average weekday in October 2019 (pre-COVID 19) for transit lines serving the study area were obtained from Metro. This data includes the average daily bus boardings and deboardings at each stop and provided in **Table 4.12-2: Average Weekday Ridership at Bus Stops within Study Area**. Crenshaw Boulevard at the Florence Avenue stop has the highest boarding and alighting activities with 997 boardings and 904 alightings compared to other bus stops within the study area. La Brea Avenue – Hawthorne Boulevard appears to be the busiest transit corridors within the study area; the corridor has a daily average of 259 boardings and 269 alightings.



SOURCE: Raja Associates, Inc. - September 2021

FIGURE 4.12-3

**Existing Transit System**



**Table 4.12-2**  
Average Weekday Ridership at Bus Stops within Study Area

Average Weekday Ridership at Bus Stops within Study Area Corridor	Stops Crossing Street	Metro Lines Serving Stop	Boardings	Alightings
La Brea Avenue - Hawthorne Boulevard	Hyde Park Boulevard	212	203	204
	Hazel Street	212	101	103
	Beach Avenue	212	82	87
	Florence Avenue	40/111/212	437	215
	Regent Street	40/111/212/740	532	913
	Queen Street	212/740	313	135
	Manchester Boulevard	40/111/607	168	240
	Inglewood Transit Center	40/111/442/607/740	626	551
	Market Street	40/111/442	92	114
	Tamarack Avenue	40/111/442	73	82
	Arbor Vitae Street	40/111/442	271	270
	Hardy Street	40/442	177	195
	Century Boulevard	40/442/740	603	562
	104th Street	40/442	92	120
	Lennox Boulevard	40/442	117	248
	<b>Average</b>		<b>259</b>	<b>269</b>
	Prairie Avenue	Grace Avenue	211	3
Howland Drive		211	6	0
Regent Street		211	1	1
Manchester Boulevard		211	7	13
Kelso Street/Pincay Drive		211/212	27	38
Arbor Vitae Street		211/212	72	78
Hardy Street		211/212	69	73
Century Boulevard		211/212	169	165
104th Street		211/212	86	84
Lennox Boulevard/108th Street		211/212	127	124
<b>Average</b>		<b>57</b>	<b>58</b>	
Crenshaw Boulevard	Florence Avenue	40/210/710/740	997	904
	76th Street	210	24	47
	78th Street	210	29	37
	80th Street	210	27	32
	82nd Street	210	26	35
	Manchester Boulevard	210/710	761	724
	Pincay Drive/90th Street	210	30	38
	Arbor Vitae Street	210	62	77

Average Weekday Ridership at Bus Stops within Study Area Corridor	Stops Crossing Street	Metro Lines Serving Stop	Boardings	Alightings
	Hardy Street	210	25	54
	Century Boulevard	210/710	750	788
	104th Street	210	93	95
	108th Street	210	91	110
	<b>Average</b>		<b>243</b>	<b>245</b>
Centinela Avenue	Hyde Park Boulevard	607	2	1
	Warren Lane	607	0	1
	<b>Average</b>		<b>1</b>	<b>1</b>
Florence Avenue	La Brea Avenue	40/111	252	191
	Market Street	40/111	85	37
	Hillcrest Boulevard	40/111/607	53	90
	Centinela Avenue	40/111/607/740	126	132
	Prairie Avenue	40/111	96	100
	West Boulevard	40/111	151	185
	Crenshaw Boulevard	111/740	562	505
	8th Avenue	111	141	159
	5th Avenue	111	63	82
	Van Ness Avenue	111	193	196
<b>Average</b>		<b>172</b>	<b>168</b>	
Manchester Boulevard	Fir Avenue	115/211	13	13
	Grevillea Avenue	115/211	174	210
	Market Street	115/211/212/442/607	519	603
	Hillcrest Avenue	115/212	321	353
	Spruce Avenue	115/212	17	53
	Tamarack Avenue	115/212	54	36
	Prairie Avenue	115/212/442	207	193
	Kareem Court	115	16	22
	Carlton Drive	115	4	4
	West Boulevard	115/442	25	26
	Crenshaw Drive	115	52	48
	11th Avenue	115	32	38
	Crenshaw Boulevard	115/442	548	589
5th Avenue	115	70	79	
Van Ness Avenue	115/442	126	141	
<b>Average</b>		<b>145</b>	<b>161</b>	
Arbor Vitae Street	Grevillea Avenue	111	39	36
	La Brea Avenue	111	90	89
	<b>Average</b>		<b>65</b>	<b>63</b>
Century Boulevard	Fir Avenue/Firmona Avenue	117	26	35

Average Weekday Ridership at Bus Stops within Study Area Corridor	Stops Crossing Street	Metro Lines Serving Stop	Boardings	Alightings
	La Brea Avenue/ Hawthorne Boulevard	117	346	345
	Freeman Avenue	117	92	101
	Prairie Avenue	117	185	163
	Doty Avenue	117	41	43
	Yukon Avenue	117	130	153
	Club Drive	117	232	206
	11th Avenue	117	236	205
	Crenshaw Boulevard	117	394	398
	5th Avenue	117	15	14
	Van Ness Avenue	117	120	125
	<b>Average</b>		<b>165</b>	<b>163</b>

Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., September 2021; refer to Table 4 (refer to Appendix O of this Recirculated Draft EIR).

#### 4.12.3.4 Existing Bicycle Facilities

The Draft Inglewood Active Transportation and Safe Routes to School Plan (City of Inglewood, June 2019) identifies existing bicycle facilities within the City. These facilities are classified as Bike Paths (Class I), Bike Lanes/Buffered Bike Lanes (Class II), Bike Routes/Bike Boulevards (Class III), and Protected Bike Lanes (Class IV).

Bicycle facilities are identified along the following streets:

##### **Class II Bike Lanes / Buffered Bike Lanes**

- Bike Lanes
  - Hawthorne Boulevard from Lennox Boulevard to 111th Street
  - Locust Street from Florence Avenue to Manchester Boulevard
  - Van Ness Avenue from 81st Street to Manchester Boulevard
  - Florence Avenue from Locust Street to Hillcrest Boulevard
  - Florence Avenue from Prairie Avenue to mid-way between Prairie Avenue and West Boulevard
- Buffered Bike Lanes
  - Florence Avenue from Hillcrest Boulevard to Centinela Avenue (westbound only)

##### **Class III Bike Routes / Bike Boulevard**

- Bike Routes with Sharrows
  - Van Ness Avenue from Century Boulevard to Imperial Highway
  - Florence Avenue from Hillcrest Boulevard to Centinela Avenue (eastbound only)
  - Florence Avenue from Centinela Avenue to Prairie Avenue
  - Florence Avenue from mid-way between Prairie Avenue and West Boulevard to West Boulevard
  - 76th Street from Crenshaw Drive to Vermont Avenue

#### 4.12.3.5 Existing Pedestrian Facilities

The pedestrian circulation system includes crosswalks, crosswalk push buttons, intersection traffic control, and sidewalks available to serve pedestrians. Sidewalks are generally provided along all streets in the study area. Florence Avenue, Market Street, Locust Street and Regent Street offer access and circulation possibilities to the proposed Market Street/Florence Avenue Station. Currently, sidewalks are available on the south side of Florence Avenue and on both sides of Market Street, Locust Street and Regent Street adjacent to and in the vicinity of the Market Street/Florence Avenue Station. Pedestrian crosswalks to the proposed station are available at adjacent intersections of Florence Avenue/Market Street and Florence Avenue/Locust Street.

Prairie Avenue, Manchester Boulevard, and Kelso Street-Pincay Drive offer pedestrian access and circulation possibilities to the proposed station at the Forum. Sidewalks are available on both sides of Prairie Avenue, Manchester Boulevard, and Kelso Street-Pincay Drive adjacent to and in the vicinity of the proposed Project station. Passenger crosswalks to the proposed station are available at adjacent intersections of Prairie Avenue/Manchester Boulevard and Prairie Avenue/Kelso Street-Pincay Drive.

Prairie Avenue and Hardy Street offer pedestrian access and circulation possibilities to the proposed Prairie Avenue/Hardy Street station. Sidewalks are available on both sides of Prairie Avenue and Hardy Street adjacent to and in the vicinity of the station. Passenger crosswalks to the proposed station are available at adjacent intersections of Prairie Avenue/Hardy Street and Prairie Avenue/Arbor Vitae Street.

The majority of intersections near the proposed alignment and stations are signalized and generally provide pedestrian amenities.

A brief description of the pedestrian crossing locations and amenities, including traffic signals, intersection crosswalks, and crosswalks with push buttons, along the proposed Project alignment follows:

### **Pedestrian Crossing Locations along Market Street**

- Intersection of Market Street/Florence Avenue – This intersection is signalized with pedestrian indications. Standard parallel crosswalks are available on the west and south legs of the intersection. Crosswalks are not provided on the east leg of the intersection. Call pushbuttons are provided on the west leg of the intersection. Pedestrian indications are actuated / automated on the south leg of the intersection.
- Intersection of Market Street/Regent Street – This intersection is signalized with pedestrian indications. Standard parallel crosswalks are available on the north, west and east legs of the intersection and a crosswalk with decorative design is available on the south leg. Call pushbuttons are provided on all approaches.
- Intersection of Market Street/Queen Street – This intersection is signalized with pedestrian indications. Decorative crosswalks are available on all four legs. Call pushbuttons are provided on all approaches.

### **Pedestrian Crossing Locations along Manchester Boulevard**

- Intersection of Market Street/Manchester Boulevard – This intersection is signalized with pedestrian indications. Decorative crosswalks are available on all four legs. Call pushbuttons are provided on all approaches of the intersection.
- Intersection of Locust Street/Manchester Boulevard – This intersection is signalized with pedestrian indications. Standard parallel crosswalks are available on all four legs of the intersection. Call pushbuttons are provided on the west and east legs of the intersection. Pedestrian signal calls are actuated/automated on the north and south legs of the intersection.
- Intersection of Hillcrest Boulevard/Manchester Boulevard – This intersection is signalized with pedestrian indications. Standard parallel crosswalks are available on all four legs of the intersection. Call pushbuttons are provided on the west and east legs of the intersection. Pedestrian signal calls are actuated/automated on the north and south legs of the intersection.
- Intersection of Spruce Avenue/Manchester Boulevard – This intersection is signalized with pedestrian indications. Standard parallel crosswalks are available on west and south legs of the intersection. Crosswalks are not provided on the east leg of the intersection. Call pushbuttons are provided on the west and south legs of the intersection.

### **Pedestrian Crossing Locations along Prairie Avenue**

- Intersection of Prairie Avenue/Manchester Boulevard – This intersection is signalized with pedestrian indications. Standard parallel crosswalks are available on all four legs of the intersection. Call pushbuttons are provided on all approaches of the intersection.

- Intersection of Prairie Avenue/Nutwood Street – This intersection is unsignalized with the eastbound approach stopped at the intersection. A continental (ladder) crosswalk is available on the west leg of the intersection.
- Intersection of Prairie Avenue/Kelso Street–Pincay Drive – This intersection is signalized with pedestrian indications. Yellow school crosswalks are available on all four legs of the intersection. Call pushbuttons are provided on all approaches of the intersection.
- Intersection of Prairie Avenue/La Palma Drive – This intersection is unsignalized and stop controlled on the eastbound approach. A continental crosswalk is available on the west leg of the intersection.
- Intersection of Prairie Avenue/Buckthorn Street–Touchdown Drive – This intersection is signalized with pedestrian indications. Standard parallel crosswalks are available on all four legs of the intersection. Call pushbuttons are provided on all approaches of the intersection.
- Intersection of Prairie Avenue/Arbor Vitae Street – This intersection is signalized with pedestrian indications. Standard parallel crosswalks are available on all four legs of the intersection. Call pushbuttons are provided on all approaches of the intersection.
- Prairie Avenue/Hardy Street – This intersection is signalized with standard parallel crosswalks being available on the north and west legs of the intersection, and east leg from the Hollywood Park Specific Plan (HPSP) area. A crosswalk is not provided on the south leg of the intersection. Call pushbuttons are provided on the north, west, and east legs of the intersection.

### **4.12.3.6 Existing On-Street Parking**

A summary of the number of on-street parking spaces and parking restrictions along Market Street, Manchester Boulevard, and Prairie Avenue along the proposed alignment are described below:

There are currently 104 on-street parking spaces located along Market Street between Florence Avenue and Manchester Boulevard with parking restrictions listed below.

Metered 2-hour on-street parking is allowed on both sides of Market Street between Florence Avenue and Regent Street, all day except from 3:00 AM to 7:00 AM. There are 30 on-street parking spaces on west side of the street and 14 on-street parking spaces on the east side of the street.

Metered 2-hour on-street parking is allowed on both sides of Market Street between Regent Street and Manchester Boulevard. There are 31 on-street parking spaces on the west side of the street and 29 on-street parking spaces on the east side of the street.

There are currently 70 on-street parking spaces located along Manchester Boulevard between Market Street and Prairie Avenue with the parking restrictions listed below.

On-street parking is prohibited on both sides of Manchester Boulevard between Market Street and the alley to the east.

Metered 2-hour on-street parking is allowed on both sides of Manchester Boulevard between the alley (west of Locust Street) and Locust Street all day except from 3:30 AM to 7:00 AM. There are four on-street parking spaces on the south side of the street and seven on-street parking spaces on the north side of the street.

Metered 2-hour on-street parking is allowed on both sides of Manchester Boulevard between Locust Street and Hillcrest Boulevard all day, except from 3:30 AM to 7:00 AM. There are nine on-street parking spaces on the south side of the street and six on-street parking spaces on the north side of the street.

On-street parking is prohibited on south side of Manchester Boulevard between Hillcrest Boulevard and Spruce Avenue; metered 2-hour on-street parking is allowed on north side of Manchester Boulevard between Hillcrest Boulevard and Spruce Avenue all day, except from 3:30 AM to 7:00 AM. There are 12 on-street parking spaces located on the north side of the street.

Metered 2-hour on-street parking is allowed on south side of Manchester Boulevard between Spruce Avenue and Tamarack Avenue with the exception of no parking allowed during the evening peak hours from 4:00 PM to 6:00 PM. Metered 2-hour on-street parking is allowed on the north side of Manchester Boulevard between Spruce Avenue and Tamarack Avenue all day, except from 3:30 AM to 7:00 AM. There are 10 on-street parking spaces on the south side of the street and 14 on-street spaces on the north side of the street.

Non-metered 2-hour on-street parking is allowed on south side of Manchester Boulevard between Tamarack Avenue and Osage Avenue with the exception of no parking allowed during the evening peak period (4:00 PM to 6:00 PM); metered 2-hour on-street parking is allowed on north side of Manchester Boulevard between Tamarack Avenue and Osage Avenue all day, except from 3:30 AM to 7:00 AM. There are approximately four on-street parking spaces on the south side of street and four on-street parking spaces on the north side of the street.

On-street parking is prohibited on both sides of Manchester Boulevard between Osage Avenue and Prairie Avenue. There are no on-street parking spaces along Prairie Avenue between Manchester Boulevard and Hardy Street.

#### 4.12.4 ADJUSTED BASELINE CONDITIONS

Adjusted Baseline conditions are discussed below in 4.12.5.2: *Methodology*.

#### 4.12.5 THRESHOLDS OF SIGNIFICANCE

Pursuant to SB 743, the latest Technical Advisory from OPR explicitly states that transit projects including passenger rail projects (like the proposed ITC Project) would be presumed to not cause significant impacts since they would reduce VMTs, encourage development of multimodal transportation networks and encourage development of mixed-use projects (diversity of land uses), the three primary goals of SB 743. However, to quantify the magnitude of reduction of VMTs, and consequently GHG emissions and potential operational benefits associated with the proposed Project, the Project is evaluated based on the following thresholds derived from Appendix G of the CEQA Guidelines relative to transportation impacts. Significant transportation impacts would occur if the proposed Project would result in the following:

- Threshold T-1: Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and passenger facilities.**
- Threshold T-2: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).**
- Threshold T-3: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).**
- Threshold T-4: Result in inadequate emergency access.**

CEQA Guidelines section 15064.3 establishes that, generally, VMT is the appropriate measure of transportation impacts. Construction impacts are temporary in nature and therefore are typically not considered as significant impacts for purposes of CEQA. While no quantitative significance criteria are established for evaluation of construction impacts, potential effects associated with construction are evaluated based on the duration of construction and the extent of disruption during various construction activities.

#### 4.12.5 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

##### 4.12.5.1 Project Design Features

The proposed Project includes the following Project Design Features (PDFs) related to the transportation and traffic effects of the Project.

##### PDF TRANS-1 Transit Access and Circulation Program

The Project Task Force [as identified in the Construction Commitment Program (CCP)] will be responsible for the following:

#### 4.12 Transportation

- Ensuring that access to bus transit stops and bus circulation are always maintained, unless infeasible and closure is approved by the City.
- Coordinating 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.

#### PDF TRANS-2 Construction Staging and Traffic Control Program

A Construction Staging and Traffic Control Program will be developed by members of the Project Task Force (as defined in the CCP), subject to review and acceptance by the City and/or the JPA, and will 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 will 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.

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- 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 should 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.

#### PDF TRANS-3 Preliminary Haul and Overload Routes

- Haul routes and overload/oversized vehicle routes are subject to review and approval by the City.
- To the extent possible, truck deliveries and hauling of bulk materials such as aggregate, bulk cement, dirt, etc. to the Project area, and hauling of material from the Project area, shall be scheduled during off-peak hours to avoid the peak commuter traffic periods on designated haul routes.
- Truck deliveries and hauling of dirt, aggregate, bulk cement, and all other materials and equipment, shall be on designated routes only (freeways and non-residential streets).

#### PDF TRANS-4 Pedestrian Access Program

A Pedestrian Access Program will be developed by members of the Project Task Force (as defined in the CCP), subject to review and acceptance by the City and/or the JPA, and will adhere to the following principles:

- Pedestrian access to buildings shall be maintained at all times.

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- 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 Federal 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 Inglewood Unified School District 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.

#### PDF TRANS-5 Parking Management Plan

A Parking Management Plan (as defined in the CCP) will 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:

- 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.

#### 4.12 Transportation

#### 4.12.5.2 Methodology

The ITDF, which is based on the SCAG Regional Travel Demand Model, was used to estimate VMT in the City and assess the effect of the Project on VMT. The geographic scope for the evaluation of VMT included all of the traffic analysis zones (TAZs) within the City of Inglewood such that all trips and consequently, VMTs to and from areas within the City are included. Since the ITDF is based on the SCAG Regional Travel Demand Model, regional conditions are reflected in the model and the VMT analysis conducted with the model.

The ITDF Model and an event model, described in the following paragraph, were used to forecast the number of daily trips on the roadway system for both non-event and event-based traffic for the scenarios evaluated in this Recirculated Draft EIR. Socio-economic data from the SCAG's 2020–2045 RTP/SCS was used as the base input and updated to include all the growth associated with related projects. The ITDF, which is similar in structure to the SCAG Regional Travel Demand Model involves four-step models including Trip Generation, Trip Distribution, Mode Split and Traffic Assignment procedures, implemented using TransCAD software package.

The event model includes a series of spreadsheet-based pivot tables using the Metro Mode-Split Model. The event model includes total attendance, average vehicle ridership, transit accessibility for both walk-access and drive-access and modal-split parameters to estimate the ITC ridership values for each of the different types of events at each of the major event venues in the area including the Forum, SoFi Stadium, and the Inglewood Basketball and Entertainment Center (IBEC). Vehicular traffic generation estimated in the event model was then distributed utilizing trip distribution based on season ticket data or mobile source data for each type of event at the various venues, and then assigned on the roadway network using specialized procedures in ArcGIS' network analyst extension.

The ITDF Model and the Metro Mode-Split Model were used to estimate the non-event based travel demand without and with the ITC Project, while the event model was utilized to estimate the event travel forecasts without and with the ITC Project. The non-event and event-based travel forecasts were aggregated on the various roadway segments identified within the study area to obtain ADT estimates for the following scenarios:

- Adjusted Baseline Conditions Non-Event Weekdays without Project
- Adjusted Baseline Conditions Non-Event Weekdays with Project
- Future Opening Year (2027) Conditions with Event without Project
- Future Opening Year (2027) Conditions with Event with Project
- Future Horizon Year (2045) Conditions with Event without Project
- Future Horizon Year (2045) Conditions with Event with Project

For evaluation of VMTs for these scenarios, the ITDF model was used with all Inglewood TAZs used as ‘select-zones’ in the model to determine the trips and associated VMTs to and from the City TAZs for non-event conditions under each of the scenarios analyzed in this study. For events of all types at each of the venues, VMTs were estimated including private vehicles, shuttles, and TNCs for both attendees and employees in the event model spreadsheets.

The methodology for evaluating each of the above scenarios is described below:

#### **Adjusted Baseline Conditions**

The Adjusted Baseline Environmental Setting is described in **Section 4.0: Environmental Analysis**. These environmental conditions included in the Adjusted Baseline Conditions include socio-economic and demographic components, and transportation network components that are currently under construction or have building permits issued by the City of Inglewood in the immediate vicinity of the ITC Project alignment. Accordingly, the travel demand forecasting model used in the process was updated as required to reflect these assumptions. The socio-economic databases used in the ITDF model were updated to include portions of Phase 1 of the HPSP. The City has issued permits for a substantial portion of HPSP Phase 1 uses including the 70,240-seat SoFi Stadium, the 6,000-seat Performance Venue, approximately 518,000 SF of retail and restaurant uses, approximately 466,000 SF of office use, 314 dwelling units and approximately 12 acres of open space. Additionally, the Metro K line is assumed to be completed and operational as part of the Adjusted Baseline Conditions. The primary socio-economic data including population, households and employment within the City of Inglewood are estimated to be approximately 117,688, 38,958 and 37,763, respectively under Adjusted Baseline Conditions.

ITC ridership projections for Adjusted Baseline conditions were simulated using the latest SCAG Regional Model and Metro Mode Split Model including updates to the socio-economic databases and transit networks to reflect the ITC Project, and the other transit network changes noted previously. The estimated non-event daily ITC ridership under Adjusted Baseline conditions is approximately 1,844 daily passengers.

The projected weekday daily traffic volumes along the analyzed street segments in the study area for Adjusted Baseline non-event conditions without the Project were estimated using the model output on each of the individual segments of each of the arterials (major and minor) and collector streets within the study area.

Adjusted Baseline non-event conditions with Project scenario also projected weekday daily traffic volumes along the analyzed street segments using the model output on each of the individual segments of each of the arterials (major and minor) and collector streets within the study area.

Utilizing the updated socio-economic/demographic data and the transportation network detailed above, the ITDF model simulations were conducted to obtain Adjusted Baseline daily traffic volume forecasts and VMT estimates. These daily traffic volumes were estimated using the model output on each of the individual segments of each of the arterials (major and minor) and collector streets within the study area.

#### **Future Opening Year (2027) Conditions**

The ITDF Model was updated to reflect changes in demographic/economic and transportation network characteristics based on the latest SCAG 2020-2045 RTP/SCS model-based socio-economic databases and network assumptions. Next, socio-economic data growth associated with related projects identified in the area of influence of the study area was verified within the socio-economic data and further updated where required. Additional special generator input such as LAX-related trip tables including the forecasted Million Annual Passengers (MAP-level) growth, consistent with the SCAG 2020-2045 RTP/SCS, were also included in the ITDF in the overall estimation of travel demands under future opening year conditions.

The National Football League (NFL) Game event-day traffic model under future opening year conditions was utilized to prepare the NFL game day event traffic forecasts. A sold-out NFL afternoon game event on a weekday at the NFL Stadium (70,240 attendees and 6,000 employees per game) was assumed in the model. The NFL-Game event-day VMT model was also used to estimate the NFL game event-generated VMT. Attendee and employee vehicle trips by private vehicles, transportation network company (TNCs), and shuttles to and from the parking facilities to the Stadium, were included in both the event traffic demand and VMT models.

Forecasts from the Future Opening Year (2027) ITDF model and NFL-Game event-day traffic model was aggregated to reflect event-day ADTs as well as the event-day daily VMTs under future opening year conditions.

Future 2027 Conditions also reflect related development projects anticipated to be constructed and occupied prior to the opening year of the proposed Project. A total of 395 related projects were identified. Of these related projects, 74 are located in the City of Inglewood, 91 are within the City of Los Angeles to the east and west of the City of Inglewood, 73 are in the City of Culver City to the north, 120 are in the South Bay cities of El Segundo, Lawndale, Hawthorne, and Gardena to the south and south-west, and 37 projects are located within the unincorporated area of the County of Los Angeles scattered in the neighboring areas.

Notable among these development projects within the City of Inglewood is HPSP Phase 2. When combined with the baseline development in Phase 1, it is assumed that there will be a total of 890,000 SF of retail

space, approximately 4.03 million SF of office space, 2,500 dwelling units and a 300-room hotel, in addition to the SoFi stadium and the Performance Venue.

The primary socio-economic data variables including population, households and employment within the City of Inglewood are estimated to be approximately 152,774, 51,251, and 61,327, respectively, under future opening year conditions.

#### **Future Opening Year (2027) Conditions with Event without Project**

Future Opening Year (2027) non-event forecasted daily traffic volumes from the updated ITDF model were combined with a sold-out NFL Game Event-Only daily traffic volumes to obtain Future Opening Year (2027) with Event Day without ITC Project weekday daily traffic volumes.

#### **Future Opening Year (2027) Conditions with Event with Project**

Weekday 2027 non-event conditions with the ITC Project were simulated using the updated ITDF and Event Travel Demand Model (ETDM) models, including updates to socio-economic databases and transit networks to reflect the ITC Project, as well as associated transit base-network changes and operational parameters.

NFL Game event day conditions with the ITC Project were simulated using a spreadsheet-based model based on the METRO mode-split model and actual data related to the event attendees' zip-code information.

#### **Future Horizon Year (2045) Conditions**

The ITDF model was updated to reflect changes in demographic/socio-economic data and transportation network characteristics based on the latest SCAG 2020-2045 RTP/SCS based model data. Additional special generator input such as LAX-related trip tables including projected MAP growth, consistent with the latest SCAG 2020-2045 RTP/SCS were also included in the ITDF to produce travel demands under future horizon year conditions.

The NFL-Game event-day traffic model under future horizon year conditions was developed to prepare the event traffic forecasts. A sold-out NFL afternoon game event on a weekday at the NFL Stadium (70,240 attendees and 6,000 employees per game) was assumed in the model. Metro's mode-split model was used along with the event day characteristics. The NFL-Game event-day VMT model was also used to estimate the event-generated VMT. Attendee and employee vehicle trips including private vehicles, transportation network company (TNCs) vehicles, and shuttles to and from the parking facilities to the Stadium, were included in both the event travel demand and VMT models.

Results from the Future Horizon Year (2045) updated ITDF and NFL-Game event-day traffic models were combined to reflect event-day daily traffic under future horizon year conditions. Similarly, results from the 2045 ITDF model and NFL-Game event-day VMT model were combined to reflect cumulative event-day daily VMT under future horizon year conditions.

The socio-economic data describing demographic and socio-economic characteristics within the model area was updated based on the 2045 socio-economic databases from the 2020 SCAG RTP/SCS Regional Model data. This data was updated to account for growth from related projects. In addition to the list of development projects used under the Future Opening Year (2027) conditions, the HPSP Phase 2 was included in the socio-economic databases used in the ITDF model for the future horizon year 2045 conditions. It has been assumed that by 2045, a total of 6.03 million SF of office use would be in place in the overall HPSP area.

The primary socio-economic data variables including population, households and employment within the City of Inglewood are estimated to be approximately 165,618, 56,952 and 69,280, respectively, under Future Horizon Year (2045) conditions.

#### **Future Horizon Year (2045) Conditions with Event Without Project**

Weekday 2045 non-event conditions without the ITC Project were simulated using the ITDF model updated to include the latest SCAG 2020–2045 RTP / SCS Model data and growth associated with related projects in the study area.

Next, NFL Game event conditions without the ITC Project were simulated using the ETDM model based on the Metro's mode-split model and actual data related to the event attendees' zip-code information.

Future Horizon Year (2045) non-event forecasted daily traffic volumes from the updated ITDF model were combined with a sold-out NFL Game Event-Only daily traffic volumes without the ITC Project to obtain the cumulative Future Horizon Year (2045) with NFL Event without ITC Project weekday daily traffic volumes.

#### **Future Horizon Year (2045) Conditions with Event with Project**

Weekday 2045 non-event conditions with the ITC Project were simulated using the ITDF model updated to include data from the latest SCAG 2020–2045 RTP / SCS Model and transit network including the ITC Project and associated operational scenarios. NFL Game event with the ITC Project conditions were simulated using the ETDM model.

### **Travel Demand Model for Events**

An ETDM, a multistep model based on the Metro Mode-Split Model output including transit accessibility parameters, was used to estimate traffic generated by events at the event venues in the study area. The ETDM utilizes event type, attendance, and mode splits to provide estimates of the proposed Project transit ridership, as well as modal trip generation estimates for use in generating vehicle trip assignments on the roadway network.

The specific event-day traffic conditions were simulated using trip generation estimates from the ETDM and a trip distribution profile developed based on ticket sales or mobile source data that identified the zip codes of event attendees.

#### **4.12.5.3 Project Improvements**

The ITC Project components include an elevated grade-separated guideway and three stations that traverse along Market Street, Manchester Boulevard, and Prairie Avenue. A brief description of the existing and proposed characteristics of these roadway segments including number of lanes, intersection geometry, traffic control, on-street parking, sidewalks/crosswalks, and speed limits is provided below.

##### **Market Street Segment**

Market Street between Florence Avenue and Manchester Boulevard will include the same number of lanes as existing conditions (one lane in either direction). No change to roadway throughput or capacity is proposed as part of the Project. The speed limit along Market Street will remain at 25 mph, similar to existing conditions.

Lane configurations and traffic control at intersections will mostly remain similar to existing conditions at the intersections of Market Street/Florence Avenue and Market Street/Manchester Boulevard, resulting in very little to no changes to intersection capacities. Changes to intersection lane configurations due to the proposed Project would occur at the intersections of Market Street/Regent Street and Market Street/Queen Street. No changes to intersection traffic control are proposed at these intersections.

##### **Manchester Boulevard Segment**

Manchester Boulevard between Market Street and Prairie Avenue will include the same number of lanes as existing conditions, i.e., two lanes in either direction with turn lanes at intersections between Market Street and Hillcrest Boulevard; and two lanes / three lanes in the westbound / eastbound directions, respectively, with turn lanes at intersections between Hillcrest Boulevard and Prairie Avenue. No change to roadway capacity or traffic control is proposed as part of the Project. The speed limit along Manchester Boulevard will remain at 35 mph, similar to existing conditions.

Lane configurations at intersections will mostly remain similar to existing conditions at all locations within that stretch, resulting in no changes to intersection capacities. Additionally, little to no reductions in turn-lane storage lengths are proposed at any of the intersections within this stretch as part of the ITC Project. Minor modifications to lane configurations at the intersection of Manchester Boulevard and Prairie Avenue may be required or desired based on prevailing demands at the time of construction of the Project. This could be achieved by restriping at the time of implementation of the Project.

##### **Prairie Avenue Segment**

Prairie Avenue between Manchester Boulevard and Hardy Street will include the same number of lanes as existing conditions (three lanes in either direction with a central turn lane including the turn lanes at intersections). No change to roadway capacity is proposed as part of the Project. The speed limit along Prairie Avenue will remain at 40 mph, similar to existing conditions. No on-street parking will be allowed along Prairie Avenue within this stretch similar to existing conditions.

Lane configurations and traffic control at intersections will mostly remain similar to existing conditions at all locations within that stretch, resulting in no changes to intersection capacities. Additionally, no reductions in storage lengths are proposed at the intersection turn lanes as part of the ITC Project. Minor modifications to lane configurations at the Manchester Boulevard / Prairie Avenue intersection may be required or desired, based on prevailing traffic demands at the time of implementation of the Project.

##### **Pick-Up/Drop Off Areas and Surface Parking Lots**

Pick-up/Drop-off areas would be provided along the west side of Locust Street south of Florence Avenue, as well as along the north-side of Regent Street between Locust Street and Market Street. A reduction in on-street parking spaces of approximately thirteen (13) spaces along Regent Street and seventeen (17) spaces along Locust Street would occur due to the Pick-up/Drop-off areas and the surface parking lot driveways proposed as part of the Project.

A surface parking lot with approximately 650 public parking spaces is proposed at the adjacent Market Street/Florence Avenue station site. This surface parking lot would provide the replacement parking spaces for the reduced parking along Locust Street and Regent Street where Pick-up/Drop-off areas are proposed and additional public parking to support use of the ITC and Downtown Inglewood in general.

There are currently 104 on-street parking spaces along Market Street between Florence Avenue and Manchester Boulevard. The Market Gateway Project (D3 Project) would reduce the on-street parking by 11 spaces along the west side of Market Street between Florence Avenue and Regent Street. The proposed Project would reduce an additional 37 on-street parking spaces along Market Street between Florence

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Avenue and Manchester Boulevard. These spaces will be relocated to the surface parking lot at the Market Street/Florence Avenue station site.

There are currently 81 on-street parking spaces along Manchester Boulevard between Prairie Avenue and La Brea Avenue. The Project would result in reduction of approximately 48 metered on-street parking spaces. An additional off-street surface parking lot will also be provided at the northeast corner of Market Street and Manchester Boulevard to provide approximately 50 additional public parking spaces, replacing six (6) existing spaces, and obtaining access off of the alley east of the site.

Finally, a surface parking lot is proposed at the Prairie Avenue/Hardy Street station. This parking lot would have approximately 80 parking spaces and a shuttle bus pick-up and drop-off area. This lot would be used for public parking, TNCs and shuttle bus pick-up and drop-off operations during events.

In addition, the City is considering building a parking structure on the City's Inglewood Transit Facility (ITF) site located on the southeast corner of Prairie Avenue and Arbor Vitae Street within the Hollywood Park Specific Plan area. This parking structure would provide additional public parking near event venues in the LASED and for the IBEC. The ITF site is currently improved as a surface parking lot and bus transit facility. This planned parking structure would provide up to 2,500 parking spaces in a six-level building.

While this proposed parking facility would be located within the Hollywood Park Specific Plan area and is not proposed as part of the Project, it is considered herein as part of the potential circulation system in which the Project will operate.

#### 4.12.5.4 Impact Analysis

An evaluation of the impact criteria for the proposed Project under construction and in operation is provided in the following sections.

**Impact T-1:** **Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

#### Construction

Construction of the proposed Project would occur in eight phases over approximately 46 months between January 2024 and November 2027. The detailed construction phasing is described in **Section 3.0: Project Description** and represents a conservative set of assumptions for analysis of the maximum potential impacts from construction of the Project. It is likely that these construction phases will overlap to provide the most efficient construction schedule. Prior to construction of the proposed Project, reconstruction of

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the existing Vons store proposed to be demolished to allow construction of the MSF is proposed on the corner of Manchester Boulevard and Hillcrest Boulevard.

A summary description of construction phasing is provided below:

- **Phase 1** would include, but not limited to, demolition of buildings and site improvements on properties acquired for construction of the Project and the beginning of construction of the Maintenance and Storage Facility (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. Phase 1 construction would start in January 2024. After demolition of existing buildings and site improvements, the remaining asphalt flatwork areas at the commercial plaza at Market Street and Regent Street, the commercial building at 150 S. Market Street, and the retail commercial center on the northwest corner of Prairie Avenue and Hardy Street will provide space for construction staging 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 the Hardy Street intersection to Manchester Boulevard and work at the MSF site. Phase 2 construction would also include removal of existing sidewalks, roadways, landscaping, and demolition of other improvements as needed along the guideway alignment and the installation of buildings for the electrical equipment and subsystems at each of the two Power Distribution System (PDS) Substation sites. The second phase of construction would occur in 2024 through 2025. This phase will include the construction of the primary power feed from utility provider Southern California Edison (SCE). The feed would extend from the SCE's Inglewood substation at the northwest corner of Florence Avenue and Ivy to the MSF. The feed will consist of an underground duct bank of medium voltage conductors located in the public right way, routed from the Inglewood substation: south along Fir Avenue to Regent Street; east on Regent Street to Market Street; south on Market Street to Manchester Boulevard; east on Manchester Boulevard to the MSF site.
- **Phase 3** would include foundation work for the Automated Transit System (ATS) guideway, foundation work for the Market Street/Florence Avenue station, and construction for the support structure of the MSF building. Phase 3 work will also include removal of existing sidewalks, roadways, landscaping, and demolition of other improvements as needed along the guideway alignment; the installation of buildings for the electrical equipment and subsystems at each of the two PDS substation sites; construction of the support structure, columns, and cross girders for the MSF building; and drill foundations for the three stations would occur during Phase 3. The third phase of construction would occur in 2024 through 2025.
- **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 will include utility relocation (if necessary), foundations, CIP columns, guideway column caps, and installation of equipment at the PDSs. Similar to Phases 1-3, removal of existing sidewalks, roadways, landscaping, and demolition of other improvements as needed along the guideway alignment (including new or temporary pavement

#### 4.12 Transportation

and asphalt for road work and sidewalks) and utility work would also occur in this phase. The fourth phase of construction would occur in 2025 through 2026.

- **Phase 5** construction 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 will include guideway girders, guideway straddle caps, and installation of equipment at the PDSs. Aerial construction of the guideway on Market Street, including temporary closure of Market Street, would occur during this phase. Phase 5 construction would occur in 2025 through 2026.
- **Phase 6** construction 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, completion of Prairie Avenue/Manchester Boulevard station, completion of Prairie Avenue/Hardy station, and completion of the MSF building, and the elevated passenger walkway to the Metro K Line Downtown Inglewood Station. Aerial construction of the guideway on Manchester Boulevard and Prairie Avenue, including temporary closure of Manchester Boulevard and Prairie Avenue. Phase 6 would also involve location of the staging and holding area for the delivery of precast segments, girders, and beams on the MSF staging area and completion of the MSF facility. Phase 6 construction would occur in 2025 through 2026.
- **Phase 7** would include final site work and completion of the stations including final site work and paving on Manchester Boulevard; completion of the Prairie Avenue/Hardy Street station; completion of the Prairie Avenue/Manchester Boulevard station; completion of the Market Street/Florence Avenue station; final site work at the MSF site; final site work at the Market Street/Florence Avenue station; construction of all surface parking lots; and final roadway improvements and modifications, and re-striping of streets as required. Phase 7 would occur in 2026.
- **Phase 8** construction 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. Phase 8 construction would occur in 2025 through 2027, with the primary construction activities occurring in 2026 and some installation of equipment starting towards the end of Phase 3 construction when sufficient aerial structure is available for the installation of the equipment.

The document *Inglewood Transit Connector Project: Baseline Construction Phasing Narrative*, Gannett Fleming, Inc., June 2021, provides an estimate of the quantities of construction debris and spoils generated, and the resulting volume of truck trips, which are estimated as follows:

- Demolition of existing commercial buildings and site improvements on the site of the Market Street/Florence Avenue station and MSF site will yield approximately 40,308 cubic yards (CY) of debris generating approximately 2,686 truck haul trips.
- Each vertical support column would be supported by a reinforced concrete shaft foundation and pile cap, which would yield spoils to be trucked away. The volume to be disposed of would total approximately 124,474 cubic yards, generating approximately 5,186 truck haul trips.

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- On the properties proposed for acquisition and easement areas, including the retail plaza and the gas station properties, approximately 7,884 cubic yards of soil will be required to be disposed of, which will generate approximately 328 truck haul trips.
- Staging of the trucks would occur on the north side of Manchester east of Prairie with spaced intervals scheduling for in-time loading. Approximately 260 trucks on any given day would enter the construction zone areas inside the K-rails and exit the areas per the noted truck haul routes. The majority of the hauling will occur during the night shift to avoid traffic congestion and would use designated truck routes.
- Street sweepers would be employed for controlling dust and for keeping the streets clean. Flag persons would be present controlling the flow of traffic during the exporting activity.

Assuming arrival patterns consistent with anticipated shift times at construction sites of this nature, most of the manpower workforce trips would occur outside of the peak hours of adjacent street traffic. Construction activity would occur 24 hours a day, seven days a week. Heavy construction activities (those involving the use of large equipment on site) would over a 16-hour day schedule with two shifts, either a morning shift from approximately 7:00 AM to 3:00 PM and an evening shift from approx. 3:00 PM to 11:00 PM, or a morning shift from approximately 7:00 AM to 3:00 PM and a night shift from approximately 11:00 PM to 7:00 AM. 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 nighttime to minimize traffic impacts.

Additionally, construction of the ATS guideway, columns and station components that could affect Prairie Avenue and Manchester Boulevard would involve construction-related traffic occurring during the off-peak hours and night hours in order to minimize effects to daily commuter traffic and potential event traffic. Delivery of construction materials could occur during the night shift. Construction activities during the day shift would primarily consist of work that could proceed without substantial disruption to daily commuter traffic and potential event traffic along Prairie Avenue and Manchester Boulevard. Additionally, some minor activity could potentially occur during periods in between construction shifts for logistics, moving equipment, etc.

The primary delivery routes include Florence Avenue, Manchester Boulevard, Prairie Avenue and Century Boulevard as shown in **Figure 4.12-4: Construction Haul/Delivery Routes and Staging Areas**. For materials delivered to and stored at designated construction staging areas, the contractor's haul routes to and from the Project area would be generally located on public streets. To minimize traffic effects to streets in and around the proposed Project area, **PDF TRANS-3** would be implemented, which would ensure excavated dirt materials/spoils will be hauled during off-peak and late-night hours to the extent possible.



SOURCE: Raja Associates, Inc. - September 2021

FIGURE 4.12-4

**Construction Haul / Delivery Routes and Staging Areas**

251-003-20

**Market Street, Market Street/Florence Avenue Station, and Public Parking Lot Construction**

The construction area along the Market Street corridor extends from Florence Avenue to Manchester Boulevard and includes the Market Street/Florence Avenue station site and the surface parking site on the northeast corner of Market Street/Manchester Boulevard. Construction along Market Street between Florence Avenue and Manchester Boulevard includes enabling the construction sequence of the ATS alignment components. Construction activities along this stretch of Market Street would occur in Phases 3 through 5 and Phases 7 and 8.

Construction of the Market Street/Florence Avenue station includes the demolition of the existing commercial building structures at the southeast corner of the intersection of Market Street and Florence Avenue and the construction of an elevated passenger walkway over Florence Avenue. After demolition of the structures, the remaining asphalt flatwork areas at the commercial plaza at Market Street and Regent Street will provide suitable 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 construction duration. Construction activities at the Market Street/Florence Avenue station site occurs in Phases 1, 3, 4, 6, 7 and 8.

**Vehicle Circulation and On Street Parking**

Construction along Market street would include drilling foundations for the ATS guideway, construction of the guideway columns and column caps. Construction procedures/plans include the installation of two rows of K-Rail systems along Market Street to delineate the construction area, which includes approximately 25 feet of public right-of-way along the center-line of Market Street between Manchester Boulevard and Florence Avenue. This construction area will allow for maintenance of one travel lane in each direction. On-street (metered) parking would not be accessible within staging sections of the construction area during construction. A temporary full street closure along Market Street within the formwork phase, traffic would not be allowed to pass underneath the structure. To minimize traffic effects, 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 (see PDF TRANS-2 in Section 4.12.5.1: Project Design Features, above). Final roadway improvements and modifications, and re-striping of the streets as required would occur during Phase 7. Phase 8 would involve periodic temporary lane closures as 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.

In the vicinity of the construction area, traffic flow along Florence Avenue, Market Street, Regent Street and Locust Street are generally not constrained and would continue to operate the same way during

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construction. The conceptual construction procedures/plans do not include long-term closure of any travel lanes along these roadways during construction of the Market Street/Florence Avenue station. However, intermittent short-term curb lane closures potentially may occur. Also, the construction of the elevated passenger walkway to the Metro K Line Downtown Inglewood Station may require temporary closure of Florence Avenue. 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 (see **PDF TRANS-2** in *Section 4.12.5.1: Project Design Features*, above). The staging and holding area for the delivery of precast segments, girders, and beams would be located in the Market Street staging area. Deliveries to the construction area may require temporary street closures. 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.

The construction activities potentially may result in the temporary removal of on-street parking spaces along the construction area frontages. A Construction Staging and Traffic Control Program and a Parking Management Plan would be prepared (see **PDF TRANS-2** and **PDF TRANS-5** in *Section 4.12.5.1: Project Design Features*, above) as part of the Project's CCP and would minimize construction-related traffic and parking effects.

Vehicular access to alleys and driveways along Market Street within the construction area will be maintained at all times. Therefore, construction activities would not result in the loss of vehicular access to alleys, parcels and various land uses in the vicinity of construction area.

#### **Pedestrian Facilities**

The construction area along Market Street would be located in the center of the roadway and would not interfere with existing sidewalks. Existing sidewalks would remain open and pedestrian circulation would be maintained along the construction area. The pedestrian access and circulation to all adjacent parcels will be maintained at all times. Potential intermittent closure of the sidewalks within the construction area may occur due to safety measures. These closures would mostly occur at night and late in the evenings.

Sidewalks along the construction area's frontages generally will not be closed during construction of the Market Street/Florence Avenue station. However, during certain construction activities (i.e., concrete pours), there may be potentially intermittent closure of the construction area's frontage sidewalks. Pedestrian access to buildings will be maintained at all times during construction. Stretches of sidewalks along the west side of Locust Street and north side Regent Street would be closed during construction of pick-up/drop-off areas. All existing crosswalks will be maintained unless infeasible, in which case the contractor will obtain permission from the City to close the crosswalk.

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Potential intermittent closure of the sidewalks within the construction area may occur due to safety measures. Generally, a major portion of the common passenger routes to school will not be affected by the construction activities. However, the contractor would coordinate with the Inglewood Unified School District (IUSD) and provide crossing guards at locations requested by the City or IUSD when crosswalks or sidewalks are closed. Further, temporary alternate routes to school could be identified working closely with IUSD and the City, and this information will be disseminated to all schools and stakeholders affected by construction.

#### **Bicycle Facilities**

There are currently no bicycle facilities provided along Market Street or Regent Street. Also, no bike parking is provided in the immediate vicinity of the construction area along Market Street or the site of the Market Street/Florence Avenue station.

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. The contractor may provide "sharrow" pavement marking along the southbound Locust Street to allow shared use of the travel lane by vehicles and bicycles.

#### **Transit Facilities**

There are no bus routes traveling along Market Street, Regent Street, or Queen Street within the vicinity of the construction area. It is anticipated that no bus stops would be removed or relocated due to the construction activities along Market Street. Additionally, no transit bus rerouting would be required along Market Street during construction along Market Street.

The bus stop on the west side of Locust Street serving MTA Bus Lines 211 and 607 and the bus stop on the south side of Florence Avenue serving MTA Bus Lines 40 and 111 may need to be temporarily relocated during certain Market Street/Florence Avenue station construction activities. Therefore, the Project Task Force would be responsible for coordination with the Metro and any other transit providers to temporarily relocate these bus stops or reroute transit bus lines if necessary (see **PDF TRANS-1** in *Section 4.12.5.1: Project Design Features*, above).

### **Manchester Boulevard, MSF Structure Site, and Prairie Avenue/Manchester Boulevard station Construction**

Construction along Manchester Boulevard between Market Street and Prairie Avenue includes enabling the construction sequence of the ATS alignment components. Construction activities along this stretch of Manchester Boulevard would occur in Phases 3 through 8.

Construction of the MSF structure includes the demolition of the existing supermarket (Vons) building, gas station, and other buildings that would allow the construction of the MSF building and structure and PDS substation. The construction area is bounded by Manchester Boulevard on the north, Nutwood Street on the south, Hillcrest Boulevard on the west and Spruce Avenue on the east. Construction activities at the MSF site occurs in all phases of construction.

Construction of the Prairie Avenue/Manchester Boulevard station includes the demolition of the existing commercial building at 401 S. Prairie Avenue. The construction area is bounded by Manchester Boulevard on the north, Nutwood Street on the south and Prairie Avenue on the east. Construction activities at the Prairie Avenue/Manchester Boulevard station site would occur in Phases 1, 3, 5, 6, 7 and 8.

#### **Vehicle Circulation and On-Street Parking**

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. The 22-foot construction area on the south side of Manchester Boulevard between Hillcrest Boulevard and Prairie Avenue would result in the loss of two travel lanes in the eastbound direction. An additional eastbound lane can be provided by removal of the raised medians and on-street parking within the construction area during this phase of construction. Therefore, within this stretch, two lanes along Manchester Boulevard in each direction can be maintained during construction at most times. 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. Construction activities also include drilling foundations for the ATS guideway along southside of Manchester Boulevard from Market Street to Prairie Avenue.

Once the work on the south side of the street is completed, the contractor would then switch to the north side of Manchester Boulevard and install a K-rail system to delineate the construction area. This construction area would potentially include up to 22 feet of public right-of-way starting from the northerly face of curb, excluding sidewalks, from Prairie Avenue to Market Street. The 22-foot construction area on

the north side of Manchester Boulevard between Market Street and Locust Street would remove on-street parking and one travel lane in the westbound direction. This would result in four travel lanes with no left-turn lanes within the construction area section. Therefore, two lanes per direction along Manchester Boulevard can be maintained with removal of left-turn lanes during construction at most times.

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. Two travel lanes in each direction could be maintained by utilizing the left- turn lanes and removing the on-street parking on the south side of the street. The construction area on the north side of Manchester Boulevard between Hillcrest Boulevard and Prairie Avenue would also 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. Additionally, traffic control at intersections within the construction areas would be implemented as needed to minimize the degree and duration of impacts and maintain safety (see **PDF TRANS-2** in *Section 4.12.5.1: Project Design Features*, above).

Finally, following the work on the north side of Manchester Boulevard between Market Street and Prairie Avenue, the contractor would switch to construction along the median of Manchester Boulevard. This construction area would potentially include up to 25 feet of public right-of-way and would result in the loss of on-street parking and one travel lane in each direction. Therefore, one westbound travel lane and two eastbound travel lanes would be maintained during this construction activity along the median of Manchester Boulevard. Additionally, traffic control at intersections within the construction areas at intersections would be maintained similar to existing conditions at all times.

Temporary full street closure along Manchester Boulevard within the construction area would occur during aerial construction of the railway formwork. To minimize traffic effects, 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 (see **PDF TRANS-2** in *Section 4.12.5.1: Project Design Features*, above). Additionally, a Construction Staging Plan and Traffic Control Program will be developed and designed to minimize traffic effects on residential streets. Final roadway improvements and modifications, and restriping of the streets as required would occur during Phase 7. Phase 8 will involve periodic temporary lane closures as 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.

As indicated previously, 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

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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 (see **PDF TRANS-2** in *Section 4.12.5.1: Project Design Features*, above). 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, which would include the demolition of the commercial buildings (existing Vons building and gas station) at 500 E. Manchester Boulevard. However, intermittent short-term curb lane closures potentially may occur. The construction activities also potentially may result in the temporary removal of the non-metered on-street parking spaces along the Spruce Avenue construction area frontage. 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. However, intermittent short-term curb lane closures potentially may occur. The construction activities may also potentially result in the temporary removal of the non-metered on-street parking spaces along the Nutwood Street construction area frontage. Construction would not affect the vehicular driveways to parcels along Manchester Boulevard, Prairie 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 the construction area.

#### Pedestrian Facilities

Construction along Manchester Boulevard would include removal of existing sidewalks as needed to be replaced with new or temporary sidewalks. Existing sidewalks generally would be closed within construction area staging sections. However, 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 **PDF TRANS-2**, sidewalk closures should be avoided to the degree feasible and are permitted only when approved by the City with accessible detours provided if sidewalk closures are necessary. Pedestrian access to buildings would be maintained at all times and any sidewalk closures are subject to review and approval by the City (see **PDF TRANS-4** in *Section 4.12.5.1: Project Design Features*, above). Crosswalks would be maintained unless otherwise authorized for temporary closure by the City. During certain construction activities (i.e., concrete pours), intermittent

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closure of the sidewalks within the construction area may be required. The contractor would coordinate with IUSD and provide crossing guards at locations requested by the City when crosswalks or sidewalks are closed. Further, temporary alternate routes to school could be identified working closely with IUSD and the City, and this information would be disseminated to all schools and stakeholders affected by the construction. The pedestrian access and circulation to all adjacent parcels would be maintained within the construction areas to the degree feasible with some access, including pedestrian common routes to school, would generally be maintained at all times; intermittent closure of the sidewalks within the construction area may occur due to safety measures. Generally, the pedestrian common routes to school would not be affected by the construction activities due to temporary sidewalks, maintaining crosswalks and providing crossing guards when crosswalks or sidewalks are closed.

Sidewalks along the frontages of the construction areas generally would not be closed during construction of the MSF and Prairie Avenue/Manchester Boulevard station. During certain construction activities (i.e., concrete pours), intermittent closure of the sidewalks within the construction area may occur. However, pursuant to **PDF TRANS-4**, pedestrian access to adjacent buildings will be maintained at all times. All existing crosswalks will be maintained to the extent feasible. Under the **PDF TRANS-4**, 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.

#### Bicycle Facilities

There are no bicycle facilities along Manchester Boulevard within the construction area, Hillcrest Boulevard, Spruce Avenue, Nutwood Street, and Prairie Avenue. Also, no bike parking is provided in the immediate vicinity of the construction area. Therefore, no temporary closures of bicycle facilities along Market Street, Manchester Boulevard, Hillcrest Boulevard, Spruce Avenue, Nutwood Street, or Prairie Avenue would occur due to construction activities.

#### Transit Facilities

The bus stops within the construction area may potentially need to be temporarily relocated. Pursuant to **PDF TRANS-2**, such temporary relocation of bus stops would be coordinated with Metro. 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 will continue to operate along the same

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routes when the Metro K Line commences operation. If these bus lines are shortened, terminated, or re-routed when the K Line commences operations, then no transit circulation/access would be affected.

No bus stops would be removed or relocated during the construction of the MSF. Additionally, no transit bus rerouting would be required during construction.

#### ***Prairie Avenue and Prairie Avenue/Hardy Street Station Construction***

Construction along Prairie Avenue between Manchester Boulevard and Hardy Street includes enabling the construction sequence of the ATS alignment components. Construction activities along this stretch of Prairie Avenue will occur in all phases of construction.

Construction of the Prairie Avenue/Hardy Street station includes the demolition of the existing retail commercial center at northwest corner of Prairie Avenue and Hardy Street, the commercial building at 923 S. Prairie Avenue, and the commercial building at 1003 S. Prairie Avenue. The construction area is bounded by Prairie Avenue on the east and Hardy Street on the south.

#### **Vehicle Circulation and On-Street Parking**

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. Construction would then include new pavement, sidewalks, streetlights, traffic signals, and other infrastructure on Prairie Avenue, and then shifting the roadway east to its new alignment. A K-rail system delineating the construction area would be installed including approximately 22 feet of public right-of-way from the westerly face of curb, excluding sidewalks, along Prairie Avenue from Hardy Street to Manchester Boulevard. 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. Once the work on the west side of the street is completed, work would then switch to the east side of Prairie Avenue between Manchester Boulevard and Kelso Street / Pincay Drive. This work would entail installation of a K-rail system to delineate the construction area. To minimize traffic effects under **PDF TRANS-2**, all closures, full or partial, would be subject to City review and approval, which would include consideration of measures to minimize the degree and duration of street and lane closures

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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, as part of **PDF TRANS-2**, temporary full closures would be coordinated with the City of Inglewood and emergency response personnel. Detour routes are included in **PDF TRANS-2** and would be updated as necessary to minimize traffic impacts on residential streets. **PDF 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). Final roadway improvements and modifications, and re-striping of the streets as required would occur during Phase 7.

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 re-configuration 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. The construction activities also may result in the temporary removal of the non-metered on-street parking spaces along the Hardy Street construction area frontage. 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.

#### **Pedestrian Facilities**

Construction activities include removal of existing sidewalks as needed and replacement with new or temporary sidewalks. Existing sidewalks generally will be closed within the construction area staging section. However, temporary sidewalks would be provided for the duration of the construction, in order to maintain pedestrian circulation. Temporary sidewalks will meet all applicable safety standard including a minimum sidewalk width of five feet. Pedestrian access to buildings will be maintained at all times. All

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existing crosswalks will be maintained unless it is infeasible to do so. During certain construction activities (i.e., concrete pours), there may be intermittent closure of the sidewalks within the construction area. Under **PDF TRANS-2**, 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 would be coordinated. Intermittent closure of the sidewalks within the construction area may occur due to safety measures.

Sidewalks along the Prairie Avenue/Hardy Street station construction area frontages would not be closed during construction. During certain construction activities (i.e., concrete pours), there may be intermittent closure of the sidewalks within the construction area. However, pedestrian access to adjacent buildings will be maintained at all times. All existing crosswalks will be maintained unless infeasible. The contractor would provide crossing guards at locations requested by the City when crosswalks or sidewalks are closed.

Generally, a major portion of the passenger common routes to school will not be affected by the construction activities. However, the contractor will coordinate with IUSD to provide appropriate information and alternative routes to school away from construction areas during the period of construction and this information will be disseminated to all schools and stakeholders affected by the construction. The contractor would coordinate with IUSD and provide crossing guards at locations requested by the City when crosswalks or sidewalks are closed.

#### **Bicycle Facilities**

There are no bicycle facilities along Prairie Avenue, Hardy Street, or along any cross-streets within the construction area. Also, no bike parking is provided in the immediate vicinity of the construction area. Therefore, no temporary closures of bicycle facilities along Prairie Avenue or Hardy Street would occur due to construction activities.

#### **Transit Facilities**

The bus stops within the construction area may need to be temporarily relocated. Coordination with transit providers regarding the need to temporarily relocate bus stops and reroute transit to La Brea Avenue would need to occur during temporary full closure of Prairie Avenue. Full street closure would occur during late night hours. It is not currently known, if these bus lines will continue to operate along the same routes when the Metro K Line commences operation. If these bus lines are shortened, terminated, or re-routed when the K Line commences operations, then no transit circulation/access would be affected.

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The City would continue outreach efforts during the construction period to inform communities and businesses of the latest project construction updates, to coordinate mitigation measures to local businesses for parking and access, and to provide additional signage, advertisements, and support throughout the construction duration. While construction of the Project will have temporary effects on roadway, passenger, bicycle, and transit facilities, **PDF TRANS-1** through **PDF TRANS-5** in *Section 4.12.5.1: Project Design Features*, above, would be implemented to ensure access and circulation remains adequate for all modes of travel (vehicular, passenger, bicycle, and transit) and uses along the Project alignment during construction.

Implementation of **PDF TRANS-2** would ensure adequate circulation and access for all uses located along the proposed alignment of the ATS system, including providing adequate vehicular access to businesses at all times. Transportation related inconveniences would be reduced to the extent feasible. **PDF TRANS-2** would also 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. Thus, efforts would be made to keep all traffic lanes open for peak directional travel. If all lanes cannot remain open, one lane would be kept open for peak direction and supplemented by detour options.

**PDF 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 Project could affect transit services.

While access to some uses would be disrupted and detoured for short periods of time during construction, through implementation of **PDF TRANS-1** through **PDF TRANS-5**, adequate access and circulation would continue to be available at all times and construction of the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and passenger facilities. With implementation of **PDF TRANS-1** through **PDF TRANS-5**, impacts during construction would be less than significant.

#### **Operation**

The proposed Project is consistent with the goals of Senate Bill 743 for reduction of GHG emissions, developing multimodal transportation networks; and encouraging and supporting mixed-use development.

The ITC Project is consistent with Goals 1, 2, 4, 5, 6, 7 and 8 identified in the 2020–2045 RTP/SCS because the Project will promote regional economic prosperity; improve mobility, accessibility, reliability and travel

safety; increase travel choices for movement of people; reduce greenhouse gases and improving air quality; support active transportation and consequently support healthy and equitable communities; support integrated mixed-use development and transportation networks; and leverage new transportation technologies. Goals 3, 9, and 10 are not applicable to the proposed Project. The proposed Project would further the objectives of the plan by increasing local and regional transportation options while reducing VMT and greenhouse gas emissions locally and in the region. The increase in transportation service capacity would promote regional economic prosperity and competitiveness while serving major regional activity centers including Downtown Inglewood, SoFi Stadium, the Forum and the IBEC. Additional analysis of the consistency of the Project with the 2020–2045 RTP/SCS is presented in **Section 4.9: Land Use and Planning**.

The proposed Project would decrease local VMT and improve local air quality (See **Section 4.2: Air Quality**) in the City of Inglewood and reduce greenhouse gas emissions (See **Section 4.7: Greenhouse Gas Emissions**) and would be consistent with the RTP/SCS Goals and Policies.

Additionally, **Section 4.9** and **4.12.7: Consistency with City General Plan** below, discuss the Project’s consistency with the goals in the General Plan related to transportation. An amendment to the Circulation Element is proposed as part of the proposed Project that includes changes to text and diagrams. As discussed further below, with the changes to the text and diagrams, the proposed Project would continue to be consistent with the Circulation Element. The proposed Project would further the goals and objectives stated within the Circulation Element by providing reliable transit service and improving mobility of the local City residents while reducing the number of vehicles on the existing roadway. As described in **Section 4.9**, the proposed Project would support and be consistent with the Environmental Justice Element. The proposed Project is consistent with the Land Use Element because it will increase existing capacity and provide additional access to public transportation within the City and the region by adding a transit system to connect visitors and residents with Downtown Inglewood and activity centers in the City to the regional light rail system.

The proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and passenger facilities and impacts associated with operation of the Project would be less than significant.

**Mitigation Measures**

No mitigation is required.

**Level of Significance after Mitigation**

Impacts would be less than significant.

**Impact T-2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?**

An evaluation of the reduction in VMT due to the proposed Project was prepared using the ITDF Model as discussed previously in **4.12.5.1: Methodology**. For events of all types at each of the venues, VMT was estimated including private vehicles, shuttles, and TNCs for both attendees and employees. Changes in VMT and traffic volumes on streets in the study area are discussed below.

**Adjusted Baseline Non-Event with Project Traffic Conditions**

As discussed previously, the primary socio-economic data variables including population, households and employment within the City of Inglewood are estimated to be 117,688, 38,958 and 37,763, respectively, under Adjusted Baseline conditions without the ITC Project. Under Adjusted Baseline conditions with the ITC Project, the population and household data are estimated to remain at 117,688 and 38,958, respectively (no change compared to Adjusted Baseline without ITC Project), while the employment socio-economic data is estimated to change to 37,192 due to the acquisition and demolition of existing commercial properties to accommodate the construction of the Project. As previously discussed, a new Vons grocery store will be built on the MSF site to replace the existing grocery store building that would be demolished to accommodate the MSF.

As presented in **Table 4.12-3: Weekday Daily Traffic Volumes Adjusted Baseline Without and With Project**, with implementation of the ITC 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. Overall, the analyzed corridors would experience less congestion on a system-wide basis, particularly during the peak periods, with implementation of the ITC Project.

**Table 4.12-3  
Weekday Daily Traffic Volumes Adjusted Baseline Without and With Project**

Street	Facility Type	Segment		Daily Traffic Volumes	
		From	To	Adjusted Baseline without ITC Project	Adjusted Baseline with ITC Project
<b>North/South Streets</b>					
La Brea Av	Major Arterial	Hyde Park Bl	Florence Av	20,985	20,643
		Florence Av	Manchester Bl	24,680	24,320
		Manchester Bl	Spruce Av/Market St	19,362	19,224
		Spruce Av/Market St	Arbor Vitae St	24,983	24,295
		Arbor Vitae St	Hardy St	28,805	28,229
		Hardy St	Century Bl	29,976	29,506

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Street	Facility Type	Segment		Daily Traffic Volumes			
		From	To	Adjusted Baseline without ITC Project	Adjusted Baseline with ITC Project		
Hawthorne Bl	Major Arterial	Century Bl	104th St	43,055	42,682		
		104th St	Lennox Bl	48,207	47,904		
		Florence Av	Regent St	22,089	21,755		
		Regent St	Manchester Bl	22,157	21,797		
Prairie Av	Major Arterial	Manchester Bl	Pincay Dr/Kelso St	29,251	28,289		
		Pincay Dr/Kelso St	Arbor Vitae St	38,953	37,767		
		Arbor Vitae St	Hardy St	32,546	31,026		
		Hardy St	97th St	34,953	33,492		
		97th St	Century Bl	34,953	33,492		
		Century Bl	102nd St	31,452	30,619		
		102nd St	104th St	31,954	31,139		
		104th St	Lennox Bl	32,563	31,857		
		Crenshaw Bl	Major Arterial	80th St	Manchester Bl	23,668	23,423
				Manchester Bl	Pincay Dr/90th St	26,291	26,108
Pincay Dr/90th St	Arbor Vitae St			32,019	31,756		
Arbor Vitae St	Hardy St			30,872	30,592		
Hardy St	Century Bl			31,682	31,385		
Century Bl	104th St			27,528	27,248		
Market St	Minor Arterial	Florence Av	Regent St	3,219	3,198		
Myrtle Av	Collector	Regent St	Manchester Bl	7,790	7,727		
Myrtle Av	Collector	Arbor Vitae St	Hardy St	3,881	3,555		
Doty Av	Collector	Century Bl	104th St	5,557	5,453		
Yukon Av	Collector	Century Bl	104th St	10,443	10,213		
Locust St	Collector	Florence Av	Manchester Bl	3,728	3,691		
<b>East/West Streets</b>							
Centinela Av	Major Arterial	Hyde Park Bl	Florence Av	25,766	25,439		
Florence Av	Major Arterial	Fir Av	La Brea Av	16,835	16,797		
		La Brea Av	Market St	21,042	21,035		
		Market St	Centinela Av	24,496	24,281		
		Centinela Av	Prairie Av	40,740	40,466		
Manchester Bl	Major Arterial	Prairie Ave	West Bl	40,093	39,857		
		Grevillea Av	La Brea Av	21,435	20,955		
		La Brea Av	Market St	21,733	21,073		
		Market St	Locust St	18,821	18,180		
		Locust St	Hillcrest Bl	20,190	19,567		
		Hillcrest Bl	Spruce Av	24,505	23,873		
		Spruce Av	Prairie Av	28,735	27,983		

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Street	Facility Type	Segment		Daily Traffic Volumes	
		From	To	Adjusted Baseline without ITC Project	Adjusted Baseline with ITC Project
Hawthorne Bl	Major Arterial	Prairie Av	Kareem Ct	31,974	31,388
		Kareem Ct	Crenshaw Dr	36,748	36,106
		Crenshaw Dr	Crenshaw Bl	27,895	27,338
		Crenshaw Bl	Van Ness Av	31,211	30,735
Arbor Vitae St	Major Arterial	Grevillea Av	La Brea Av	13,751	13,228
		La Brea Av	Myrtle Av	9,251	8,913
		Myrtle Av	Prairie Av	8,426	8,026
Century Bl	Major Arterial	Grevillea Av	La Brea Av/Hawthorne Bl	50,609	50,132
		La Brea Av/Hawthorne Bl	Myrtle Av	41,279	40,867
		Myrtle Av	Freeman Av	37,897	37,653
		Freeman Av	Prairie Av	33,189	32,942
		Prairie Av	Doty Av	41,073	40,239
		Doty Av	HP Casino Dr	42,370	41,522
		HP Casino Dr	Yukon Av	42,370	41,522
		Yukon Av	Club Dr	41,153	40,283
		Club Dr	Crenshaw Bl	43,164	42,234
		Crenshaw Bl	Van Ness Av	36,633	36,040
Regent St	Collector	Grevillea Av	La Brea Av	5,199	5,121
		La Brea Av	Market St	16,175	15,985
		Market St	Prairie Ave	8,199	8,093
		Grevillea Av	La Brea Av	8,701	8,562
Hillcrest Bl	Collector	La Brea Av	Market St	7,287	7,147
		Market St	Nutwood St / Locust St	9,060	8,647
		Nutwood St / Locust St	Manchester Bl	5,018	4,707
Spruce Av	Collector	Manchester Bl	Florence Av	7,946	7,636
		La Brea Av	Manchester Av	2,959	2,468
Kelso St / Pincay Dr	Collector	Spruce Av	Prairie Av	5,592	5,356
		Prairie Av	Kareem Ct	19,138	18,746
		Kareem Ct	Crenshaw Bl	14,364	14,028
Hardy St	Collector	La Brea Av	Prairie Ave	4,736	3,806
104th St	Collector	Grevillea Av	Hawthorne Bl	6,859	6,786
		Hawthorne Bl	Prairie Ave	4,102	4,100
		Prairie Av	Doty Av	3,581	3,501

Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., September 2021; refer to Table 8 (refer to Appendix O of this Recirculated Draft EIR).

**Future Opening Year (2027) with Event and Project**

As discussed previously, the primary socio-economic data variables including population, households and employment within the City of Inglewood are estimated to be 152,774, 51,251 and 61,327, respectively, under Future Opening Year (2027) conditions without ITC Project. Under Future Opening Year (2027) conditions with the ITC Project, population, and household socio-economic data variables do not change, while the employment socio-economic data is estimated to be 60,756 due to the acquisition of existing commercial properties to accommodate the construction of the Project.

NFL game event conditions with the ITC Project is estimated to generate approximately 23,540 daily trips. As presented in **Table 4.12-4: Weekday Daily Traffic Volumes Future Opening Year (2027) With Event and Project**, with implementation of the ITC Project, daily traffic volumes would decrease along these 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. Overall, the analyzed corridors would experience less congestion on a system-wide basis with the implementation of the ITC Project.

**Table 4.12-4  
Weekday Daily Traffic Volumes Future Opening Year (2027) With Event and Project**

Street	Facility Type	Segment		Daily Traffic Volumes	
		From	To	Future Opening Year (2027) with Event without ITC Project	Future Opening Year (2027) with Event and ITC Project
<b>North/South Streets</b>					
La Brea Av	Major Arterial	Hyde Park Bl	Florence Av	26,222	25,804
		Florence Av	Manchester Bl	30,442	29,968
		Manchester Bl	Spruce Av/Market St	25,372	25,137
		Spruce Av/Market St	Arbor Vitae St	34,531	33,647
		Arbor Vitae St	Hardy St	33,430	32,725
Hawthorne Bl	Major Arterial	Hardy St	Century Bl	37,247	36,580
		Century Bl	104th St	54,238	53,610
		104th St	Lennox Bl	59,511	58,954
Prairie Av	Major Arterial	Florence Av	Regent St	25,969	25,267
		Regent St	Manchester Bl	25,280	24,549
		Manchester Bl	Pincay Dr/Kelso St	39,267	37,609
		Pincay Dr/Kelso St	Arbor Vitae St	42,582	41,034
		Arbor Vitae St	Hardy St	38,402	36,430
		Hardy St	97th St	47,068	44,909

Street	Facility Type	Segment		Daily Traffic Volumes	
		From	To	Future Opening Year (2027) with Event without ITC Project	Future Opening Year (2027) with Event and ITC Project
Crenshaw Bl	Major Arterial	97th St	Century Bl	47,068	44,910
		Century Bl	102nd St	42,353	40,687
		102nd St	104th St	43,661	41,859
		104th St	Lennox Bl	43,735	42,041
		80th St	Manchester Bl	29,355	28,952
		Manchester Bl	Pincay Dr/90th St	35,388	34,855
		Pincay Dr/90th St	Arbor Vitae St	44,981	44,058
		Arbor Vitae St	Hardy St	43,220	42,316
		Hardy St	Century Bl	44,527	43,606
		Century Bl	104th St	41,333	40,282
Market St	Minor Arterial	Florence Av	Regent St	4,524	4,495
		Regent St	Manchester Bl	9,367	9,236
Myrtle Av	Collector	Arbor Vitae St	Hardy St	4,636	4,261
Doty Av	Collector	Century Bl	104th St	10,222	9,898
Yukon Av	Collector	Century Bl	104th St	11,859	11,591
Locust St	Collector	Florence Av	Manchester Bl	5,635	5,540
<b>East/West Streets</b>					
Centinela Av	Major Arterial	Hyde Park Bl	Florence Av	28,683	28,287
		Fir Av	La Brea Av	21,600	21,399
Florence Av	Major Arterial	La Brea Av	Market St	26,077	25,899
		Market St	Centinela Av	32,034	31,463
		Centinela Av	Prairie Av	48,196	47,518
		Prairie Ave	West Bl	47,614	47,292
		Grevillea Av	La Brea Av	30,077	29,116
Manchester Bl	Major Arterial	La Brea Av	Market St	30,173	29,033
		Market St	Locust St	24,607	23,572
		Locust St	Hillcrest Bl	28,702	27,647
		Hillcrest Bl	Spruce Av	35,259	34,151
		Spruce Av	Prairie Av	39,409	38,200
		Prairie Av	Kareem Ct	40,188	39,351
		Kareem Ct	Crenshaw Dr	49,875	48,711
Arbor Vitae St	Major Arterial	Crenshaw Dr	Crenshaw Bl	37,283	36,352
		Crenshaw Bl	Van Ness Av	40,073	39,202
		Grevillea Av	La Brea Av	16,362	15,701
		La Brea Av	Myrtle Av	14,505	13,903
		Myrtle Av	Prairie Av	12,639	12,019
Century Bl	Major Arterial	Grevillea Av	La Brea Av/Hawthorne Bl	68,654	67,393
		La Brea Av/Hawthorne Bl	Myrtle Av	56,586	55,309
		Myrtle Av	Freeman Av	53,802	52,672

Street	Facility Type	Segment		Daily Traffic Volumes	
		From	To	Future Opening Year (2027) with Event without ITC Project	Future Opening Year (2027) with Event and ITC Project
		Freeman Av	Prairie Av	49,113	47,990
		Prairie Av	Doty Av	57,910	56,294
		Doty Av	HP Casino Dr	57,392	55,762
		HP Casino Dr	Yukon Av	57,637	56,000
		Yukon Av	Club Dr	54,057	52,465
		Club Dr	Crenshaw Bl	55,755	54,113
		Crenshaw Bl	Van Ness Av	46,262	45,217
Regent St	Collector	Grevillea Av	La Brea Av	7,490	7,395
		La Brea Av	Market St	18,874	18,628
		Market St	Prairie Ave	9,189	9,078
		Grevillea Av	La Brea Av	11,360	11,197
Hillcrest Bl	Collector	La Brea Av	Market St	9,049	8,909
		Market St	Nutwood St / Locust St	11,115	10,698
		Nutwood St / Locust St	Manchester Bl	6,570	6,261
Spruce Av	Collector	Manchester Bl	Florence Av	10,256	9,911
		La Brea Av	Manchester Av	8,153	7,525
Kelso St / Pincay Dr	Collector	Spruce Av	Prairie Av	7,250	6,941
		Prairie Av	Kareem Ct	24,905	24,224
		Kareem Ct	Crenshaw Bl	27,838	26,696
Hardy St	Collector	La Brea Av	Prairie Ave	7,370	6,359
		Grevillea Av	Hawthorne Bl	8,326	8,254
104th St	Collector	Hawthorne Bl	Prairie Ave	5,152	5,140
		Prairie Av	Doty Av	6,823	6,710

Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., September 2021; refer to Table 20 (refer to Appendix O of this Recirculated Draft EIR).

**Future Opening Year (2027) with Event Project Ridership**

The estimated non-event daily ridership under Future Opening Year (2027) conditions is 3,574 daily passengers.

The Future Opening Year (2027) with Event conditions includes a sold-out NFL football game at the SoFi Stadium. A sold-out NFL Game Event consist of 70,240 attendees and 6,000 employees on a weekday at the SoFi Stadium. As shown in Table 4.12-5: ITC Weekday Daily Ridership Future Opening Year (2027), the estimated daily ridership under Future Opening Year (2027) with Event (NFL) conditions is 29,280 daily passengers.

**Table 4.12-5  
ITC Weekday Daily Ridership Future Opening Year (2027)**

Scenario	Weekday Daily Ridership	
	Non-Event	with NFL Event*
Future Opening Year 2027 Conditions	3,574	29,280

\* Includes ridership associated with non-event weekday conditions.

Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., September 2021; refer to Table 22 (refer to Appendix O of this Recirculated Draft EIR).

Additionally, the ETDM model, was applied for each type of event at each of the venues in Inglewood to estimate the proposed Project ridership. The proposed Project ridership per event, daily and annually, under Future Opening Year (2027) conditions is presented in Table 4.12-6: ITC Ridership Per Event – Future Opening Year (2027) Conditions.

**4.12-6  
ITC Ridership Per Event – Future Opening Year (2027) Conditions**

Venue/Event Type [1]	Number of Events/Year [1]	ITC Ridership per Event	Annual ITC Ridership
NFL Game	20	25,706	514,120
NFL - Mid-Size Event	8	9,850	78,797
Performance Arena - Concert	75	2,298	172,368
The Forum - Concert	75	6,793	509,443
IBEC - NBA Game	49	7,050	345,437
IBEC - Other Sporting Event	35	2,912	101,917
IBEC - Large Concert	5	7,159	35,793
IBEC - Medium Concert	8	5,581	44,644
IBEC - Small Concert	10	3,660	36,595
IBEC - Family Shows	20	3,295	65,894
IBEC - Corporate Events	100	739	73,884
IBEC - Plaza Events	16	1,469	23,497
<b>Total</b>	<b>421</b>	<b>-</b>	<b>2,002,389</b>

[1] Based on list of events as shown in Inglewood Basketball and Entertainment Center DEIR, ESA, December 2019 - Table 3.14-2: Overview of Common Event Types, Frequency, and Timing at Project, NFL Stadium, and The Forum.

Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., September 2021; refer to Table 13 (refer to Appendix O of this Recirculated Draft EIR).

**Future Horizon Year (2045) with Event and Project**

As discussed previously, the primary socio-economic data variables including population, households and employment within the City of Inglewood are estimated to be 165,618, 56,952 and 69,280, respectively, under Future Horizon Year (2045) conditions without the ITC Project. Under Future Horizon Year (2045) conditions with the ITC Project, the population and household socio-economic data variables do not change, while the employment socio-economic data is estimated to be 68,709 due to the acquisition of existing commercial properties to accommodate the construction of the Project.

As shown in **Table 4.12-7 Future Horizon Year (2045) With Event and Project**, daily traffic volumes would decrease along key corridors with implementation of the proposed Project. The decreases in daily traffic range 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. Overall, the analyzed corridors would experience less congestion on a system-wide basis resulting in improved flow during the peak periods with the implementation of the proposed Project.

**Table 4.12-7  
Future Horizon Year (2045) With Event and Project**

Street	Facility Type	Segment		Daily Traffic Volumes	
		From	To	Future Opening Year (2045) with Event without ITC Project	Future Opening Year (2045) with Event and ITC Project
<b>North/South Streets</b>					
La Brea Av	Major Arterial	Hyde Park Bl	Florence Av	29,861	29,424
		Florence Av	Manchester Bl	33,924	33,423
		Manchester Bl	Spruce Av/Market St	29,068	28,809
		Spruce Av/Market St	Arbor Vitae St	39,767	38,837
		Arbor Vitae St	Hardy St	39,352	38,586
Hawthorne Bl	Major Arterial	Hardy St	Century Bl	44,527	43,784
		Century Bl	104th St	65,099	64,430
Prairie Av	Major Arterial	104th St	Lennox Bl	71,544	70,947
		Florence Av	Regent St	29,203	28,424
		Regent St	Manchester Bl	27,091	26,280
		Manchester Bl	Pincay Dr/Kelso St	45,088	43,184
		Pincay Dr/Kelso St	Arbor Vitae St	47,636	45,924
		Arbor Vitae St	Hardy St	44,534	42,315
		Hardy St	97th St	52,074	49,602
		97th St	Century Bl	52,074	49,602

Street	Facility Type	Segment		Daily Traffic Volumes	
		From	To	Future Opening Year (2045) with Event without ITC Project	Future Opening Year (2045) with Event and ITC Project
Crenshaw Bl	Major Arterial	Century Bl	102nd St	47,960	45,930
		102nd St	104th St	49,501	47,278
		104th St	Lennox Bl	48,963	46,866
		80th St	Manchester Bl	33,571	33,104
		Manchester Bl	Pincay Dr/90th St	39,937	39,285
		Pincay Dr/90th St	Arbor Vitae St	51,817	50,631
		Arbor Vitae St	Hardy St	49,168	48,029
Market St	Minor Arterial	Hardy St	Century Bl	50,453	49,308
		Century Bl	104th St	46,870	45,551
		Florence Av	Regent St	5,650	5,615
Myrtle Av	Collector	Regent St	Manchester Bl	10,690	10,542
Doty Av	Collector	Arbor Vitae St	Hardy St	6,099	5,680
Yukon Av	Collector	Century Bl	104th St	10,989	10,633
Lucust St	Collector	Century Bl	104th St	12,823	12,530
Locust St	Collector	Florence Av	Manchester Bl	6,592	6,467
<b>East/West Streets</b>					
Centinela Av	Major Arterial	Hyde Park Bl	Florence Av	32,424	31,971
		Fir Av	La Brea Av	26,322	26,068
Florence Av	Major Arterial	La Brea Av	Market St	31,261	31,021
		Market St	Centinela Av	37,988	37,349
		Centinela Av	Prairie Av	55,160	54,398
		Prairie Ave	West Bl	55,224	54,870
Manchester Bl	Major Arterial	Grevillea Av	La Brea Av	32,931	31,774
		La Brea Av	Market St	32,771	31,434
		Market St	Locust St	26,664	25,454
		Locust St	Hillcrest Bl	31,551	30,315
		Hillcrest Bl	Spruce Av	39,895	38,581
		Spruce Av	Prairie Av	44,370	42,962
		Prairie Av	Kareem Ct	45,758	44,778
		Kareem Ct	Crenshaw Dr	58,090	56,697
		Crenshaw Dr	Crenshaw Bl	43,024	41,933
		Crenshaw Bl	Van Ness Av	45,395	44,369
Arbor Vitae St	Major Arterial	Grevillea Av	La Brea Av	19,238	18,571
		La Brea Av	Myrtle Av	16,361	15,726
		Myrtle Av	Prairie Av	14,304	13,657
Century Bl	Major Arterial	Grevillea Av	La Brea Av/Hawthorne Bl	82,484	80,965

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Street	Facility Type	Segment		Daily Traffic Volumes	
		From	To	Future Opening Year (2045) with Event without ITC Project	Future Opening Year (2045) with Event and ITC Project
		La Brea Av/ Hawthorne Bl	Myrtle Av	66,429	64,895
		Myrtle Av	Freeman Av	64,171	62,773
		Freeman Av	Prairie Av	58,322	56,930
		Prairie Av	Doty Av	67,296	65,433
		Doty Av	HP Casino Dr	65,876	64,016
		HP Casino Dr	Yukon Av	65,917	64,055
		Yukon Av	Club Dr	61,973	60,166
		Club Dr	Crenshaw Bl	64,050	62,180
		Crenshaw Bl	Van Ness Av	54,021	52,837
Regent St	Collector	Grevillea Av	La Brea Av	9,403	9,300
		La Brea Av	Market St	22,440	22,166
		Market St	Prairie Ave	10,836	10,715
		Grevillea Av	La Brea Av	14,013	13,822
Hillcrest Bl	Collector	La Brea Av	Market St	10,783	10,627
		Market St	Nutwood St / Locust St	13,115	12,669
		Nutwood St / Locust St	Manchester Bl	7,663	7,354
Spruce Av	Collector	Manchester Bl	Florence Av	11,716	11,344
		La Brea Av	Manchester Av	9,550	8,894
Kelso St / Pincay Dr	Collector	Spruce Av	Prairie Av	8,763	8,415
		Prairie Av	Kareem Ct	28,522	27,680
		Kareem Ct	Crenshaw Bl	32,184	30,710
Hardy St	Collector	La Brea Av	Prairie Ave	8,330	7,296
		Grevillea Av	Hawthorne Bl	10,400	10,325
104th St	Collector	Hawthorne Bl	Prairie Ave	6,495	6,477
		Prairie Av	Doty Av	8,146	8,023

Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., September 2021; refer to Table 28 (refer to Appendix O of this Recirculated Draft EIR).

**Future Horizon Year (2045) with Event Project Ridership**

A summary of the proposed Project ridership under non-event conditions is presented in **Table 4.12-8: ITC Weekday Daily Ridership Future Horizon Year (2045)**. The estimated non-event daily ridership under Future Horizon Year (2045) conditions is 4,462 daily passengers. The Future Horizon Year (2045) with NFL Game Event conditions includes a sold-out event with 70,240 attendees and 6,000 employees on a weekday at the Sofi Stadium. The event-day proposed Project ridership was estimated using the ETDM

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model. The daily ridership under Future Horizon Year (2045) with NFL Game Event conditions is estimated at approximately 34,650 daily passengers.

**Table 4.12-8  
ITC Weekday Daily Ridership Future Horizon Year (2045)**

Scenario	Weekday Daily Ridership	
	Non-Event	with NFL Event*
Future Horizon Year (2045) Conditions	4,462	34,650

\* Includes ridership associated with non-event weekday conditions.

Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., September 2021; refer to Table 30 (refer to Appendix O of this Recirculated Draft EIR).

The proposed Project ridership per event, daily and annually, under Future Horizon Year (2045) conditions is presented in **Table 4.12-9: ITC Ridership Per Event – Future Horizon Year (2045) Conditions**.

**Table 4.12-9  
ITC Ridership Per Event – Future Horizon Year (2045) Conditions**

Venue/Event Type <sup>[1]</sup>	Number of Events/Year <sup>[1]</sup>	ITC Ridership per Event	Annual ITC Ridership
NFL Game	20	30,188	603,760
NFL - Mid-Size Event	8	11,837	94,694
Performance Arena - Concert	75	2,762	207,144
The Forum - Concert	75	8,163	612,226
IBEC - NBA Game	49	8,551	419,001
IBEC - Other Sporting Event	35	3,532	123,618
IBEC - Large Concert	5	8,601	43,007
IBEC - Medium Concert	8	6,705	53,643
IBEC - Small Concert	10	4,397	43,972
IBEC - Family Shows	20	3,959	79,175
IBEC - Corporate Events	100	888	88,776
IBEC - Plaza Events	16	1,765	28,233
<b>Total</b>	<b>421</b>	<b>-</b>	<b>2,397,248</b>

[1] Based on list of events as shown in Inglewood Basketball and Entertainment Center DEIR, ESA, December 2019 - Table 3.14-2: Overview of Common Event Types, Frequency, and Timing at Project, NFL Stadium, and The Forum.

Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., September 2021; refer to Table 14 in Appendix O of this Recirculated Draft EIR.

Based on the analysis of these scenarios, the proposed Project would reduce daily traffic volumes along key roadway corridors on an average weekday basis. When an NFL game event at the Sofi Stadium is

evaluated, the reduction is more substantial. This analysis demonstrates that traffic volumes would also be substantially reduced when events are held at the other sports and entertainment venues that would be served by the Project, including the Forum, IBEC, and the 6,000 seat entertainment venue at Hollywood Park. Additionally, the proposed Project is an ATS System that would provide “first-mile / last-mile” connection to the rest of the regional mass-transit system to and from major activity centers and adjacent uses in the City of Inglewood.

### Operation

#### Adjusted Baseline with Project Conditions Non-Event Daily VMT Analysis

An evaluation of the reduction in VMT due to the proposed Project was prepared for typical weekday conditions using the ITDF Model as discussed previously in 4.12.5.1. For events of all types at each of the venues, VMTs were estimated including private vehicles, shuttles, and TNCs for both attendees and employees. Daily VMTs are shown in **Table 4.12-10: Daily VMT Adjusted Baseline Without and With Project**. As presented in **Table 4.12-10: Daily VMT Adjusted Baseline Without and With Project**, the daily VMT in the City of Inglewood would be reduced by approximately 40,400 vehicle-miles with the implementation of the proposed Project under Adjusted Baseline conditions.

**Table 4.12-10**  
Daily VMT Adjusted Baseline Without and With Project

Scenario	Daily VMT	
	Without ITC	With ITC
Adjusted Baseline	3,132,256	3,091,889

Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., September 2021; refer to Table 9 (refer to **Appendix O** of this Recirculated Draft EIR).

#### Future Opening Year (2027) with Project Conditions Daily VMT Analysis

As discussed previously in 4.12.5.1, an evaluation of the reduction in VMT due to the proposed Project was prepared for Future Opening Year (2027) with an NFL Game Event at SoFi Stadium. The daily VMTs presented in **Table 4.12-11: Daily VMT Future Opening Year (2027) Without and With Project** are calculated with and without the proposed Project, for all trips to and from the City of Inglewood for a typical day when no major events are being held at the sports and entertainment venues in the City and for days when an NFL Game is hosted at SoFi Stadium. The weekday daily VMT would be reduced by approximately 247,550 vehicle-miles (4.7%) with the implementation of the proposed Project under Future Opening Year (2027) with an NFL Game Event.

**Table 4.12-11**  
Daily VMT Future Opening Year (2027) Without and With Project

Scenario	Daily VMT	
	Without ITC	With ITC
Future Opening Year (2027) Non-Event	3,906,593	3,854,924
NFL Game Event	1,368,495	1,172,624
Future Opening Year (2027) with NFL Game Event	5,275,088	5,027,548

Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., September 2021; refer to Table 21 in **Appendix O** of this Recirculated Draft EIR).

#### Future Horizon Year (2045) with Project Conditions Daily VMT Analysis

An evaluation of the reduction in VMT due to the proposed Project was prepared for Future Horizon Year (2045) with Event conditions. The daily VMTs were calculated with and without the proposed Project including all trips to and from the City of Inglewood. As shown in **Table 4.12-12: Daily VMT Future Horizon Year (2045) Without and With Project**, the weekday VMT would be reduced by approximately 316,900 vehicle-miles (5.6%), with the implementation of the proposed Project under cumulative Future Horizon Year (2045) with an NFL Game Event.

**Table 4.12-12**  
Daily VMT Future Horizon Year (2045) Without and With Project

Scenario	Daily VMT	
	Without ITC	With ITC
Future Horizon Year (2045) Non-Event	4,293,802	4,236,825
NFL Game Event	1,368,495	1,108,591
Future Horizon Year (2045) with NFL Game Event	5,662,297	5,345,416

Source: Transportation Assessment Study for the Inglewood Transit Connector Project DEIR, Raju Associates, Inc., September 2021; refer to Table 29 in **Appendix O** of this Recirculated Draft EIR).

The proposed Project would result in a reduction of VMT under all scenarios and would not, therefore, conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Impacts would be less than significant.

**Mitigation Measures**

No mitigation is required.

**Level of Significance after Mitigation**

Impacts would be less than significant.

**Impact T-3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

The proposed Project is an ATS System that would provide “first-mile / last-mile” connection to the rest of the regional mass-transit system to and from major activity centers and adjacent uses in the City of Inglewood.

The ITC Project alignment traverses along Market Street, Manchester Boulevard and Prairie Avenue and would require certain changes to the location of the curb-to-curb roadways. Lane configurations and traffic control at intersections will mostly remain similar to existing conditions at the intersections of Market Street/Florence Avenue and Market Street/Manchester Boulevard, resulting in very little to no changes to intersection capacities. Changes to intersection lane configurations due to the Project would occur at the intersections of Market Street/Regent Street and Market Street/Queen Street. The Project would result in the removal of the existing northbound left-turn lane at the intersection of Market Street/Regent Street. The northbound approach would provide a shared left/through/right-turn lane. The Project would not change the southbound, eastbound and westbound approaches. The eastbound and westbound approaches both provide a left-turn lane and a shared through/right-turn lane. Given the low traffic volumes at this intersection, this intersection would continue to operate satisfactorily. No change to the traffic signal controlling this intersection is proposed with the ITC Project.

The Project would include a reconfiguration of the northbound approach at the intersection of Market Street/Queen Street would provide a shared left/through/right-turn lane and the southbound approach would provide a shared left-turn/through lane and a separate right-turn lane. Given the low traffic volumes at this intersection, this intersection would continue to operate satisfactorily. The Project would not change the eastbound and westbound approaches. The eastbound and westbound approaches would both provide a shared left-/through/right-turn lane. No change to the traffic signal controlling this intersection is proposed with the ITC Project.

At Manchester Boulevard between Market Street and Prairie Avenue, lane configurations at intersections will mostly remain similar to existing conditions at all locations within that stretch, resulting in no changes to intersection capacities. Additionally, no reductions in turn-lane storage lengths are proposed at any of the intersections within this stretch, as part of the ITC Project. Minor modifications to lane configurations

at the Manchester Boulevard / Prairie Avenue intersection may be required or desired based on prevailing demands at the time of construction of the Project. This could be achieved by restriping at the time of implementation of the Project. Lane configurations and traffic control at intersections along Prairie Avenue between Manchester Boulevard and Hardy Street will mostly remain similar to existing conditions at all locations within that stretch, resulting in no changes to intersection capacities. Additionally, no reductions in storage lengths are proposed at the intersection turn lanes as part of the ITC Project. Minor modifications to lane configurations at the Manchester Boulevard / Prairie Avenue intersection may be required or desired, based on prevailing traffic demands at the time of implementation of the Project. However, the lane capacities along all these streets will be retained to current conditions once the ITC Project is completed.

The proposed Project consists of an aerial guideway and stations, MSF, and PDS substations. The proposed Project would include passenger access improvements, including a mezzanine level at each station to provide connectivity to elevated passenger walkways over adjacent streets. These elevated passenger walkways will be designed to improve both passenger access and comfort between the stations and the street level, in addition to providing multimodal access to adjacent bus facilities, pick-up and drop-off areas, and other adjacent resources. The proposed Project will also upgrade the existing sidewalks to ensure consistent ADA appliance along the transit corridor. These elevated passenger walkways and upgrades to existing sidewalks as part of the Project would minimize passenger-vehicle interactions. The City is proposing specific plan amendments and clarifications to the HPSP to address any potential conflict or inconsistency between the proposed Project and the HPSP related to streetscape improvements as the proposed Project would be located along approximately 0.5 miles of street frontage along Prairie Avenue within the HPSP area. Under the ITC Design Standards and Guidelines, which identify objectives for the various project components and provides design guidance to help achieve the objectives, the streetscape in downtown Inglewood would be consistent with the street furniture items which currently exists on Market Street and the historic core and in accordance with the Downtown TOD Plan.<sup>4</sup> Accordingly, the proposed Project would not create or substantially increase safety hazards due to a design feature or incompatible uses. Impacts would be less than significant.

**Mitigation Measures**

No mitigation is required.

**Level of Significance after Mitigation**

Impacts would be less than significant.

<sup>4</sup> City of Inglewood. New Downtown And Fairview Heights Transit Oriented Development Plan and Design Guidelines. <http://inglewood.arroyogroup.com/wp-content/uploads/2017/01/The-New-Downtown-Fairview-Heights-TOD-Plan-Design-Guidelines-lo-res.pdf>. November 1, 2016.

**Impact T-4: Would the project result in inadequate emergency access?****Construction**

Construction of the proposed Project would have the potential to result in temporary impacts on access and circulation. As discussed previously under **Impact T-1, PDF TRANS-1** through **PDF TRANS-5** would be implemented to ensure access and circulation remains adequate at all times along the Project alignment during construction. As part of **PDF TRANS-2**, consultation will be conducted with City police and fire personnel to ensure that emergency access and response times are maintained. Traffic Control Program Updates under **PDF TRANS-2** will require access to be maintained during construction for public safety vehicles (including police, fire, and emergency response). **PDF TRANS-2** would also require 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. Updates to the Traffic Control Plan under **PDF TRANS-2** would require the City to review all closures (full and partial) and consider measures to minimize the degree and duration of street and lane closures. The program would also require use traffic control officers/flaggers as appropriate to minimize the degree and duration of impacts and maintain safety.

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The Project has been designed to add the ATS system in the public right-of-way on Market Street, Manchester Boulevard, and Prairie Avenue while maintaining the existing number of travel lanes on these streets. As discussed previously, the Project will reduce traffic volumes on streets throughout Inglewood and reduce roadway congestion. The proposed Project would not affect existing roadway lane capacities and the speed limits. For these reasons, the proposed Project would not result in inadequate emergency access or impede existing emergency. Impacts during operation would be less than significant.

**Mitigation Measures**

No mitigation is required.

**Level of Significance after Mitigation**

Impacts would be less than significant.

**4.12.6 CUMULATIVE IMPACTS**

As discussed previously, a list of related development projects was compiled in consultation with the City of Inglewood and other surrounding jurisdictions and traffic from these projects was considered in the transportation modeling along with growth in the area based on the socio-economic databases from the 2020 SCAG RTP/SCS Regional Model data to evaluate the potential for cumulative impacts. As discussed

previously under the discussion for **Impact T-1**, the Project will not contribute to any significant cumulative impacts.

**4.12.7 CONSISTENCY WITH CITY GENERAL PLAN**

The City's General Plan contains goals within its Circulation Element and Land Use Element that relates to transportation.

**4.12.7.1 Circulation Element**

The Circulation Element discusses other modes of transportation as alternatives to the individual automobile and an evaluation of Inglewood's street environment and possible improvements. As an ATS system, the proposed Project would add to the City's range of alternative modes of transportation.

An amendment to the Circulation Element is proposed as part of the Project that includes changes to text and diagrams related to the following:

*First, Market Street, between Florence Avenue to the north and La Brea Avenue to the south currently has two lanes of traffic in each direction with a center turn lane. With the Project, Market Street, will be altered from its current configuration to have one lane of traffic in each direction between Regent Street and Manchester Boulevard with a center island. The Circulation Element currently classifies Market Street as a Minor Arterial street. Minor Arterial streets contain two lanes of traffic in each direction; this section of Market Street will be reclassified as a Collector street; Collector streets have one lane of traffic in each direction.*

The Circulation Element identifies typical street sections for common right-of-way widths and sections of streets planned for widening. The second component of the proposed amendment includes defining the maximum right of way for Prairie Avenue, between Manchester Boulevard to the north and Hardy Street to the south, as 132 feet.

Third, a description of the proposed Project, including its connection to the Metro Crenshaw/LAX Line, would be added to the description of light rail facilities in the City.

Fourth, changes to the descriptions of the street environment, parkways, medians, and on-street parking on Market Street, Manchester Boulevard, and Prairie Avenue that would be affected by the Project would be made.

Fifth, because insufficient right-of-way is available on Prairie Avenue between Manchester Boulevard and Century Boulevard to accommodate a bicycle lane, modification of the Bike Route Plan is proposed to preserve multimodal transportation options and connections for residents and employees along this section of Prairie Avenue. With these proposed amendments, the proposed Project would continue to be consistent with the Circulation Element.

#### 4.12.7.2 Land Use Element

##### Circulation

- Goal:** Ensure that proposed new uses can be accommodated by adequate and safe streets.
- Goal:** Promote and support adequate public transportation within the City and the region.
- Goal:** Develop modified traffic systems that would discourage through traffic from utilizing neighborhood streets.
- Goal:** Develop a safe and adequate passenger circulation system which is barrier-free for the handicapped.

The proposed Project is consistent with these Land Use Element goals by increasing existing capacity and providing additional access to public transportation within the City and the region by adding an extension of transit facilities to connect visitors and residents with Downtown Inglewood and activity centers in the City to the regional light rail system.

During construction of the proposed Project, right-of-way closures or diversions may occur along the length of the guideway. However, such closures would be temporary in nature and would adhere to **PDF TRANS-2** as approved by the City of Inglewood's established Project Task Force. Upon implementation of the proposed Project, the existing number of travel lanes in the area would be maintained and area roadways would continue to accommodate a range of transportation options.

The proposed Project would include passenger access at the ground level surrounding the stations along the proposed Project. Access to the stations would be accomplished through ADA-compliant passenger amenities such as escalators, elevators, stairs, signage, walkways, and mezzanine areas. Streetscape improvements along the guideway would ensure that sidewalks/walkways would be ADA-compliant surrounding stations, support columns, and other facilities. Implementation of the proposed Project would increase transit choices and reduce vehicle trips in the City.

Furthermore, as discussed previously under **Impact T-2** the proposed Project would reduce daily traffic volumes along key roadway corridors on an average weekday basis. When an NFL game event at the Sofi Stadium is evaluated, the reduction is more substantial. Furthermore, the proposed Project would connect the activity center within the City of Inglewood with the Metro's K Line at the Downtown Inglewood Station. For these reasons, the proposed Project would not conflict with Inglewood General Plan policies related to transportation.

#### 4.13 TRIBAL CULTURAL RESOURCES

##### 4.13.1 INTRODUCTION

This section of the Recirculated Draft Environmental Impact Report (Recirculated Draft EIR) evaluates the potential for implementation of the proposed Inglewood Transit Connector Project (proposed Project or ITC Project) to impact tribal cultural resources within the footprint of the proposed Project and in the immediate surrounding area.

Tribal cultural resources may include sites, features, places, cultural landscapes, sacred places, or objects with cultural value to a California Native American tribe that are listed or determined to be eligible for listing in the California Register of Historic Places (CRHR) or included in a local register of historical resources, or a resource determined by the lead California Environmental Quality Act (CEQA) agency, in its discretion and supported by substantial evidence, to be significant and eligible for listing on the CRHR. Such resources provide information on scientific progress, environmental adaptations, group ideology, or other human advancements.

Information from the following study of the proposed Project is incorporated into this section:

- *Cultural Resource Investigation*, Roberta Thomas, RPA, and Gena Granger, M.A., RPA, PaleoWest Archaeology, December 12, 2018 (**Appendix I.1**).

Information regarding the AB 52 process is provided in the following appendices:

- AB 52 Summary of the AB 52 Consultation Process for the Inglewood Transit Connector Project, Meridian Consultants LLC, December 6, 2018, (**Appendix P.1**); and
- *AB 52 Meeting Summary*, Meridian Consultants LLC, February 6, 2019 (**Appendix P.2**).

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Recirculated Draft EIR.

Prior to the preparation of the December 2020 Draft EIR, a Revised Initial Study (included as **Appendix A.2** of this Recirculated Draft EIR) was prepared using the CEQA Guidelines Environmental Checklist Form to assess potential environmental impacts resulting from construction and operation of the proposed project associated with tribal cultural resources.

After circulation of the December 2020 Draft EIR for public review, the City revised the design of the Project in response consultation with key stakeholders in the community and comments received on the December 2020 Draft EIR. Specific changes to the proposed Project include raising the height of the ATS

guideway along Market Street to preserve existing views of historic buildings, relocating the Prairie Avenue/Pincay Drive Station to the southwest corner of Prairie Avenue and Manchester Boulevard, redesign of the proposed MSF to allow this facility to be located on the proposed site with a new Vons store, and realignment of the guideway and stations on Prairie Avenue to the west side of Prairie Avenue.

These changes to the design of components of the Project will not change the potential for impacts tribal cultural resources. The Revised Project would result in impacts to tribal cultural resources similar to those discussed in the December 2020 Draft EIR. Thus, the *AB 52 Meeting Summary* (see **Appendix P.2**) of consultation would still apply to this Recirculated Draft EIR.

According to the requirements of Public Resources Code (PRC) Section 21080.3.1 (Assembly Bill [AB] 52),<sup>1</sup> Native American tribes have the right to consult on a proposed public or private project prior to the release of an EIR should the tribe(s) be concerned there are potential impacts to tribal cultural resources.

#### 4.13.2 TRIBAL CONSULTATION

As part of the AB 52 process, the City has been notified by tribes that may have interest in tribal cultural resources in the region. Four tribes had previously notified the City and requested future notification of, with the possibility of providing consultation on, any projects that proceed under CEQA. These tribes include the Gabrielino–Tongva Tribe, Gabrielino Tongva Indians of California Tribal Council, Gabrielino/Tongva Nation, and the Gabrieleno/Tongva San Gabriel Band of Mission Indians. Additionally, the Gabrieleno Band of Mission Indians–Kizh Nation (Tribe) was identified as a relevant party.

In accordance with AB 52, the City sent notification letters on July 31, 2018, notifying the four tribes identified above that the City was planning the proposed Project. Each tribe notified has 30 days from receipt of the letter to notify the City that they wish to engage in the AB 52 consultation process on the proposed Project. As of December 6, 2018, the City had received only one response requesting consultation via email from Brandy Salas, Administrative Specialist for the Tribe.<sup>2</sup> The Tribe indicated that if there were to be any ground disturbance activity associated with the proposed Project, they would like to consult. Additionally, the Tribe was mailed the Notice of Preparation and Revised Notice of Preparation for the December 2020 Draft EIR (**Appendix A.1**).

Consultation between the Tribe and the City, and the City's consultant team was initiated via conference call on February 6, 2019.<sup>3</sup> As part of the consultation, the City noted that it completed record searches to

<sup>1</sup> State of California, Public Resources Code Section 21080.3.1.

<sup>2</sup> See **Appendix P.1**, *AB 52 Tribal Notification and Outreach Summary Memorandum*.

<sup>3</sup> *AB 52 Consultation Summary*, Meridian Consultants LLC, February 6, 2019. **Appendix P.2**.

date to identify existing archaeological records, and that that information would be made available to the Tribe if they requested. A summary of the AB 52 meeting with the Tribe is provided in **Appendix P.2**.

Members of the Tribe provided an overview of the Tribe's experience with other projects in the Los Angeles Basin, including work that the Tribe has completed for LA Metro and other transit efforts. As part of the other projects, the Tribe noted that artifacts had been unearthed as part of ground disturbing activities. The Tribe also noted that many of these discoveries were the result of many of the transit routes following historic roads and routes in the Los Angeles Basin. They noted that the existing networks of major roadways followed historic and prehistoric trading routes in the area that were used by Native American tribes that resided in the area and along the west coast.

As a result of consultation, the Tribe shared information including maps of the area that depict the historic and prehistoric trading routes, and suggested mitigation measures that may be considered to assist in reducing potential impacts from the proposed Project to any cultural resources that could be unearthed during ground disturbing activities. The consultation process between the City and the Tribe has been completed and relevant analysis and mitigation is included in *Section 4.13.7: Impact Analysis for the Proposed Project*.

#### 4.13.3 METHODOLOGY

##### 4.13.3.1 Tribal Cultural Resources

The analysis of impacts to tribal cultural resources is based on the consultation between the City and the Tribe, information provided by the Tribe and a *Cultural Resource Investigation Report* (see **Appendix I.1**). As previously discussed, during the AB 52 consultation (see **Appendix P.2**), information on tribal cultural resources was provided by the Tribe; this was supplemented by the cultural resource records search (i.e., presence and proximity of known resources), the Sacred Lands File (SLF) search, land use history research, subsurface geological conditions, and the proposed excavation parameters for the proposed Project.

##### 4.13.3.2 Archival Research

A records search for the proposed Project was conducted on June 20, 2018, at the South Central Coastal Information Center of the California Historical Resource Information System housed at California State University, Fullerton and is provided as part of the *Cultural Resource Investigation* (see **Appendix I.1**). The records search included a review of all recorded historic, prehistoric archaeological resources and previous studies within the footprint and a 0.5-mile radius of the proposed Project.<sup>4</sup>

<sup>4</sup> The 0.5-mile radius provides a sufficient buffer to include all proposed components of the revised Project design. The minor relocation of components of the Project do not result in any components or features of the Project as currently proposed being outside of the area addressed by the records search.

#### 4.12 Tribal Cultural Resources

The records search results indicate that 21 previous studies have been conducted within a 0.5-mile radius of the proposed Project; however, none of these studies appear to include the Project alignment.<sup>5</sup> The records search results indicate that no archaeological or historical archaeological resources have been previously recorded within the proposed Project or within one half mile.<sup>6</sup>

The California Native American Heritage Commission (NAHC) maintains a confidential SLF which contains sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on June 15, 2018, to request a search of the SLF of the area of the proposed Project. Results of the SLF search indicate that there are no known Native American cultural resources within the immediate area of the proposed Project.

#### 4.13.3.3 Human Remains

The analysis of impacts to human remains is based on the consultation between the City and the Tribe and the *Cultural Resource Investigation* (see **Appendix I.1**). The potential for the proposed Project to contain human remains was assessed based on the cultural resource records search (i.e., presence and proximity of known resources), the SLF search, land use history research, subsurface geological conditions, and the proposed excavation parameters.

#### 4.13.3.4 Windshield Survey

A windshield/reconnaissance survey of the Project alignment was conducted on July 20, 2018.<sup>7</sup> No prehistoric or historic archaeological resources were identified during the survey. However, ground visibility in the area was very poor due the high degree of urban development disturbance.

#### 4.13.3.5 Additional Sources

Additional sources consulted during the cultural resource records search include the National Register of Historic Places, the Office of Historic Preservation Archaeological Determinations of Eligibility, and the Office of Historic Preservation Directory of Properties in the Historic Property Data File. There are no listed historical resources recorded within one half mile of the proposed Project.<sup>8</sup>

### 4.13.4 REGULATORY FRAMEWORK

Cultural historic resources are regulated at the federal, State, and local levels of government. Federal laws establish broad frameworks for cultural resource identification and protection, while State and local jurisdictions actively identify, document, and protect resources within their boundaries. The National

<sup>5</sup> See **Appendix I.1** of this Recirculated Draft EIR.  
<sup>6</sup> See **Appendix I.1** of this Recirculated Draft EIR.  
<sup>7</sup> See **Appendix I.1** of this Recirculated Draft EIR.  
<sup>8</sup> See **Appendix I.1** of this Recirculated Draft EIR.

#### 4.12 Tribal Cultural Resources

Historic Preservation Act of 1966,<sup>9</sup> the California Register of Historical Resources, the California Public Resources Code,<sup>10</sup> and CEQA are the primary federal and State laws regulating the preservation of cultural historic resources of national and State significance.

### 4.13.4.1 Federal Regulations

#### ***National Historic Preservation Act***

The National Historic Preservation Act of 1966 (NHPA) authorized formation of the National Register of Historic Places (NRHP) and coordinates public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources.<sup>11</sup> The NRHP includes districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties. A Section 106 Review refers to the federal review process designed to ensure that historic properties are considered during federal project planning and implementation.<sup>12</sup> Section 106 requires tribal consultation in all steps of the process when a federal agency project or effort may affect historic properties that are either located on tribal lands, or when any Native American tribe or Native Hawaiian organization attaches religious or cultural significance to the historic property, regardless of the property's location.

The Advisory Council on Historic Preservation, an independent federal agency, administers the review process, with assistance from State Historic Preservation Offices (SHPOs). If any impacts are identified, the agency undergoing the project must identify the appropriate SHPO to consult with during the process. A tribe may assume all or any part of the functions of SHPO in accordance with subsections (b)(2) and (b)(3) of Section 101 of the NHPA.<sup>13</sup>

<sup>9</sup> National Historic Preservation Act of 1966 amend thru 1992, Public Law. Approved October 15, 1966 (Public Law 89-665; 80 STAT.915; 16 U.S.C. 470) as amended by Public Law 91-243, Public Law 93-54, Public Law 94-422, Public Law 94-458, Public Law 96-199, Public Law 96-244, Public Law 96-515, Public Law 98-483, Public Law 99-514, Public Law 100-127, and Public Law 102-575)  
<sup>10</sup> California Public Resources Code Sections 5020-5029.5, 5079-5079.65, and 5097.9-5097.998  
<sup>11</sup> National Historic Preservation Act of 1966 amend thru 1992, Public Law. Approved October 15, 1966 (Public Law 89-665; 80 STAT.915; 16 U.S.C. 470) as amended by Public Law 91-243, Public Law 93-54, Public Law 94-422, Public Law 94-458, Public Law 96-199, Public Law 96-244, Public Law 96-515, Public Law 98-483, Public Law 99-514, Public Law 100-127, and Public Law 102-575)  
<sup>12</sup> U.S. General Services Administration, "NHPA Section 106 Tribal Consultation," accessed September 2021, <https://www.gsa.gov/resources-for/native-american-tribes/nhpa-section-106-tribal-consultation>  
<sup>13</sup> U.S. General Services Administration, "NHPA Section 106 Tribal Consultation," accessed September 2021, <https://www.gsa.gov/resources-for/native-american-tribes/nhpa-section-106-tribal-consultation>

### **National Register of Historic Places**

Section 106 of the NRHP<sup>14</sup> requires federal agencies to take into account the effects of an undertaking on historic properties, which are defined as cultural resources included in or eligible for listing in the NRHP. Determination of NRHP eligibility for cultural resources prior to making a finding of effect is made according to the following criteria:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and,

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

If cultural resources do not meet the above criteria, they are not historic properties and are not further considered in the Section 106 process. In addition to having significance, resources must have integrity for the period of significance. The period of significance is the date or span of time within which significant events transpired or significant individuals made their important contributions.

### **Secretary of the Interior's Standards**

The Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) are intended to promote responsible preservation practices that help protect irreplaceable cultural resources.<sup>15</sup> They cannot be used to make essential decisions about which features of the historic building should be saved and which can be changed. Choosing the appropriate treatment Standard, or approach, requires careful decision making and depends on a number of considerations, including level of historical significance, physical condition, proposed use, and code or regulatory requirements. Once the Standard is selected,

<sup>14</sup> U.S. General Services Administration, Section 106, 16 U.S.C. 470(f) accessed September 2021, <https://www.gsa.gov/reference/statutes/16-usc-470>.

<sup>15</sup> U.S. Department of the Interior, National Park Services, Technical Preservation Services, *The Secretary of The Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*, 2017, accessed September 2021 at <https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf>.

whether it's preservation, rehabilitation, restoration, or reconstruction, the Standards provide philosophical consistency when treatment work is undertaken.

Rehabilitation, the most common treatment approach, is the process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values. The Standards for Rehabilitation are as follows:

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

#### 4.13.4.2 State Regulations

##### Office of Historic Preservation

The Office of Historic Preservation (OHP), an office of the California Department of Parks and Recreation, implements the policies of the NRHP on a Statewide level. The OHP works to preserve California's heritage resources by ensuring that projects and programs carried out or sponsored by federal, State, and local agencies comply with federal and State historic preservation laws.

##### California Register of Historical Resources

The California Register of Historical Resources (CRHR)<sup>16</sup> is the authoritative guide to the State's significant archaeological and historical resources. It closely follows the eligibility criteria of the NRHP but deals with State and local-level resources. The CRHR serves to identify, evaluate, register, and protect California's historical resources. For purposes of CEQA, a historical resource is any building, site, structure, object, or historic district listed in or eligible for listing in the CRHR (Public Resources Code, Section 21084.1). A resource is considered eligible for listing in the CRHR if it meets any of the following criteria:

- a. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- b. Is associated with the lives of persons important in our past.
- c. Embodies the distinctive characteristics of type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- d. Has yielded, or may be likely to yield, information important in prehistory or history [Public Resources Code Section 5024.1(c)].<sup>17</sup>

Historical resources meeting one or more of the criteria listed above are eligible for listing in the CRHR. In addition to significance, resources must have integrity for a period of significance—the date or span of time within which significant events transpired or significant individuals made important contributions. Important archaeological resources are required to be at least 50 years old to be considered. "Integrity is the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance." Simply put, resources must "retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance."

<sup>16</sup> State of California, Office of Historic Preservation, California Historical Resources, accessed September 2021 at <https://ohp.parks.ca.gov/listedresources>.

<sup>17</sup> Public Resources Code (PRC), *Division 5. Parks and Monuments*[5001 - 5873], "CHAPTER 1. State Parks and Monuments," Article 2. Historical Resources (5024.1).

#### California Environmental Quality Act

CEQA also requires the lead agency to consider whether there is a significant effect on unique archaeological resources that are not eligible for listing in the California Register. As defined in CEQA,<sup>18</sup> a unique archaeological resource is:

*an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:*

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

If an archaeological resource is found eligible for listing in the CRHR, then it is considered under CEQA to be a historic resource that needs to be protected. This may also apply to unique archaeological resources. If a historic resource may be impacted by activity, under CEQA, avoidance and preservation in place is the preferred alternative. If that is not possible, then a data recovery plan will need to be created and enacted to lessen impacts to the environment to a less-than-significant level. If the archaeological resource is not eligible for listing in the CRHR, and it is not a unique archaeological resource, then no further action is required to protect or mitigate possible impacts to it.

#### California Health and Safety Code

The discovery of human remains is regulated per California Health and Safety Code, Section 7050.5,<sup>19</sup> which states the following:

*In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation...until the coroner...has determined...that the remains are not subject to...provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible... The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and...has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.*

<sup>18</sup> PRC Section 21083.2(a)

<sup>19</sup> California Health and Safety Code, Division 7, Dead Bodies, Section 7050.5

### California Public Resources Code Section 5097.98

Tribal cultural resources are protected pursuant to a number of State policies and regulations enumerated under PRC Section 5097.98.<sup>20</sup> In addition, tribal cultural resources are recognized as a nonrenewable resource.

Section 5097.98 provides procedures in the event human remains of Native American origin are discovered during project implementation. The statute requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. The statute further requires the NAHC, upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods.

In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the landowner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

### Assembly Bill 52

AB 52 applies specifically to projects for which a Notice of Preparation or a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration (MND) is filed.<sup>21</sup> The primary intent of AB 52 is to include California Native American tribes early in the environmental review process and to establish a new category of resources related to Native Americans, known as tribal cultural resources, which require consideration under CEQA. CEQA defines tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” that are either included or determined to be eligible for inclusion in the California Register or included in a local register of historical resources, or a resource that is determined to be a tribal cultural resource by a lead agency, in its discretion and supported by substantial evidence.<sup>22</sup> PRC Section 21080.3.1<sup>23</sup> requires that within 14 days of a lead agency determining that an application for a project is complete, or a decision by

<sup>20</sup> Public Resources Code, *Division 5. Parks and Monuments*, “Chapter 1.75. Native American Historical, Cultural, and Sacred Sites,” Section 5097.98.

<sup>21</sup> AB-52 Native Americans: California Environmental Quality Act., An act to amend Section 5097.94 of, and to add Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 to, the Public Resources Code, relating to Native Americans.

<sup>22</sup> PRC, Division 13. Environmental Quality Section 21080.3.2, “Chapter 2.4. Definitions.”

<sup>23</sup> PRC, Division 13. Environmental Quality Section 21080.3.1, “Chapter 2.6. General, Tribal Consultation.”

a public agency to undertake a project, the lead agency provide formal notification to the designated contact, or a tribal representative, of California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project (as defined in PRC section 21073) and who have requested in writing to be informed by the lead agency (PRC section 21080.3.1(b)). Tribes interested in consultation must respond in writing within 30 days from receipt of the lead agency’s formal notification and the lead agency must begin consultation within 30 days of receiving the tribe’s request for consultation (PRC sections 21080.3.1(d) and 21080.3.1(e)).

PRC section 21080.3.2(a)<sup>24</sup> identifies the following as potential consultation discussion topics: the type of environmental review necessary; the significance of tribal cultural resources; the significance of the project’s impacts on the tribal cultural resources; project alternatives or appropriate measures for preservation; and mitigation measures. Consultation is considered concluded when either: (1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (PRC section 21080.3.2(b)).

If a California Native American tribe has requested consultation pursuant to PRC section 21080.3.1 and has failed to provide comments to the lead agency, or otherwise failed to engage in the consultation process, or if the lead agency has complied with Section 21080.3.1(d) of the statute and the California Native American tribe has failed to request consultation within 30 days, the lead agency may certify an EIR or adopt an MND.<sup>25</sup> The statute further states that any information, including, but not limited to, the location, description, and use of the tribal cultural resources, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

<sup>24</sup> PRC, *Division 13. Environmental Quality* Section 21080.3.2, “Chapter 2.6.”

<sup>25</sup> PRC, *Division 13. Environmental Quality* Section 21080.3.2, “Chapter 2.6.”

### Senate Bill 18

Senate Bill 18 (SB 18),<sup>26</sup> which went into effect January 1, 2005, requires local governments (city and county) to consult with Native American tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. The intent is to “provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places.”

The purpose of involving tribes at these early planning stages is to allow consideration of cultural places in the context of broad local land use policy, before individual site-specific, project-level, land use designations are made by a local government. The consultation requirements of SB 18 apply to general plan or specific plan processes proposed on or after March 1, 2005.

According to the *Tribal Consultation Guidelines: Supplement to General Plan Guidelines*,<sup>27</sup> the following are the contact and notification responsibilities of local governments:

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

<sup>26</sup> Senate Bill No. 18 (Burton), An act to amend Section 815.3 of the Civil Code, to amend Sections 65040.2, 65092, 65351, 65352, and 65560 of, and to add Sections 65352.3, 65352.4, and 65562.5 to the Government Code, relating to traditional tribal cultural places.

<sup>27</sup> State of California, Office of Planning and Research, *Tribal Consultation Guidelines, Supplement to General Plan Guidelines*, November 2005.

### 4.13.4.3 Local Regulations

#### City of Inglewood

The City of Inglewood’s (City) General Plan does not identify any goals or policies related specifically to tribal resources or tribal cultural preservation ordinance or program in effect.

### 4.13.5 EXISTING CONDITIONS

#### 4.13.5.1 Environmental Setting

##### Geological Setting

The City is located in the Los Angeles Basin, a structural depression approximately 50 miles long and 20 miles wide in the northernmost Peninsular Ranges Geomorphic Province.<sup>28</sup> The Los Angeles Basin developed as a result of tectonic forces and the San Andreas fault zone, with subsidence occurring 18–3 million years ago (Ma).<sup>29</sup> While sediments dating back to the Cretaceous (66 Ma) are preserved in the basin, continuous sedimentation began in the middle Miocene (around 13 Ma).<sup>30</sup> Since that time, sediments have been eroded into the basin from the surrounding highlands, resulting in thousands of feet of accumulation. Most of these sediments are marine, as they eroded from surrounding marine formations, until sea level dropped in the Pleistocene Era and deposition of the alluvial sediments that compose the uppermost units in the Los Angeles Basin began.

The Los Angeles Basin is subdivided into four structural blocks, with the proposed Project occurring in the Central Block, where sediments range from 32,000 to 35,000 feet thick.<sup>31</sup> The Central Block is wedge-shaped, extending from the Santa Monica Mountains in the northwest, where it is about 10 miles wide, to the San Joaquin Hills to the southeast, where it widens to around 20 miles across. Specifically, however, in the Baldwin and Rosecrans hills are geomorphic features associated with uplift along the Newport–Inglewood structural zone.

The Quaternary rocks consist of shallow marine sandstone and siltstone as well as continental siltstone, mudstone, and gravel.<sup>32</sup> Older Quaternary units are exposed in these strongly dissected hills, and

<sup>28</sup> Ingersoll, R. V., and P. E. Rumelhart, *Three-stage basin evolution of the Los Angeles basin, Southern California*, *Geology* 27: 593-596, 1999.

<sup>29</sup> Critelli, S. P. Rumelhart, and R. Ingersoll, *Petrofacies and provenance of the Puente Formation (middle to upper Miocene), Los Angeles Basin, Southern California: implications for rapid uplift and accumulation rates*, *Journal of Sedimentary Research* A65: 656-667, 1995.

<sup>30</sup> Yerkes, R. F., T. H. McCulloh, J. E. Schollhamer, and J. G. Vedder, *Geology of the Los Angeles Basin – an introduction*, *Geological Survey Professional Paper* 420-A, 1965.

<sup>31</sup> Yerkes, R. F., T. H. McCulloh, J. E. Schollhamer, and J. G. Vedder, *Geology of the Los Angeles Basin – an introduction*, *Geological Survey Professional Paper* 420-A, 1965.

<sup>32</sup> City of Inglewood, *General Plan Update Technical Background Report*, August 2006.

#### 4.12 Tribal Cultural Resources

elevations range from approximately 75 feet to over 400 feet.<sup>33</sup> To the east, Holocene alluvium lies upon the regional coastal basin, also known as the Downey Plain. The sediments overlie an erosional surface of late Pleistocene age. To the west of the Rosecrans Hills is an elevated plain underlain by older Quaternary alluvium.

This area contains a drainage basin, with Holocene sediments, which narrows to the south into the Dominguez Channel. Southwest of the Project alignment, Pleistocene dune sand overlies older alluvial deposits. The main drainage courses within the area are the Dominguez Channel, Compton Creek, and Centinela Creek.<sup>34</sup>

#### Prehistoric Setting

According to recent research in the region,<sup>35</sup> the following prehistoric chronology has been divided into four general time periods: the Paleocoastal Period (12,000 to 8,000 Before Present [B.P.]), the Millingstone Period (8,000 to 3,000 B.P.), the Intermediate Period (3,000 to 1,000 B.P.), and the Late Period (1,000 B.P. to the time of Spanish contact in A.D. 1542).

While it is not certain when humans first came to California, their presence in Southern California by about 11,000 B.P. has been well documented. At Daisy Cave, on San Miguel Island, cultural remains have been radiocarbon dated to between 11,100 and 10,950 B.P.<sup>36</sup> During the Paleocoastal period, the climate of Southern California became warmer and more arid and the human population, residing mainly in coastal or inland desert areas, began exploiting a wider range of plant and animal resources.<sup>37</sup>

During the Millingstone period, there is evidence for the processing of acorns for food and a shift toward a more generalized economy. The first definitive evidence of human occupation in the Los Angeles area dates to at least 9,000 years B.P. and is associated with the Millingstone cultures.<sup>38,39</sup>

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- 33 California Department of Conservation, Division of Mines and Geology, *Seismic Hazard Zone Report for the Inglewood 7.5-Minute Quadrangle*, Los Angeles County, California, 1998.
- 34 California Department of Conservation, Division of Mines and Geology (now California Geological Survey), *Seismic Hazard Zone Report for the Inglewood 7.5-Minute Quadrangle*, Los Angeles County, California, 1998.
- 35 Homburg, Jeffrey A., John G. Douglass, and Seeths N. Reddy (editors), "Paleoenvironment and Culture History," in *People in a Changing Land: The Archaeology and History of the Ballona in Los Angeles*, California, Volume 1, series edited by D.R. Grenda, R. Ciolek-Torello and J.H. Altschul. Statistical Research, Redlands, California, 2014.
- 36 Byrd, Brian F., and L. Mark Raab, *Prehistory of the Southern Bight: Models for a New Millennium*, in *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp. 215-227, 2007.
- 37 Byrd, Brian F., and L. Mark Raab, *Prehistory of the Southern Bight: Models for a New Millennium*, in *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp. 215-227, 2007.
- 38 Wallace, W. J., *A Suggested Chronology for Southern California Coastal Archaeology*, *Southwestern Journal of Anthropology* 11(3):214-230, 1955.
- 39 Warren, C. N., *Cultural Traditions and Ecological Adaptation on the Southern California Coast, Archaic Prehistory in the Western United States*, edited by Cynthia Irwin-Williams, Eastern New Mexico University Contributions in Anthropology 1(3):1-14, 1968.

#### 4.12 Tribal Cultural Resources

Millingstone cultures were characterized by the collection and processing of plant foods, particularly acorns, and the hunting of a wider variety of game animals.<sup>40,41</sup> Millingstone cultures also established more permanent settlements that were located primarily on the coast and in the vicinity of estuaries, lagoons, lakes, streams, and marshes where a variety of resources, including seeds, fish, shellfish, small mammals, and birds, were exploited. Early Millingstone occupations are typically identified by the presence of handstones (manos) and millingstones (metates), while those Millingstone occupations dating later than 5,000 B.P. contain a mortar and pestle complex as well, signifying the exploitation of acorns in the region.

During the Intermediate period, many aspects of Millingstone culture persisted, but a number of socioeconomic changes occurred.<sup>42,43,44</sup> The native populations of Southern California were becoming less mobile and populations began to gather in small sedentary villages with satellite resource-gathering camps. Increasing population size necessitated the intensified use of existing terrestrial and marine resources.<sup>45</sup> Evidence indicates that the overexploitation of larger, high-ranked food resources may have led to a shift in subsistence, towards a focus on acquiring greater amounts of smaller resources, such as shellfish and small-seeded plants.<sup>46</sup>

This period is characterized by increased labor specialization, expanded trading networks for both utilitarian and nonutilitarian materials, and extensive travel routes. Although the intensity of trade had already been increasing, it now reached its zenith, with asphaltum (tar), seashells, and steatite being traded from Southern California to the Great Basin. Use of the bow and arrow spread to the coast around 1,500 B.P, largely replacing the dart and atlatl.<sup>47</sup> Increasing population densities, with ensuing territoriality and resource intensification, may have given rise to increased disease and violence between 3,300 and 1,650 B.P.<sup>48</sup>

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- 40 Byrd, Brian F., and L. Mark Raab, *Prehistory of the Southern Bight: Models for a New Millennium*, in *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp. 215-227, 2007.
- 41 Wallace, W. J., *A Suggested Chronology for Southern California Coastal Archaeology*, *Southwestern Journal of Anthropology* 11(3):214-230, 1955.
- 42 Erlanson, Jon M., *Early Hunter-Gatherers of the California Coast*, Plenum Press, New York, 1994.
- 43 Wallace, W. J., *A Suggested Chronology for Southern California Coastal Archaeology*, *Southwestern Journal of Anthropology* 11(3):214-230, 1955.
- 44 Warren, C. N., *Cultural Traditions and Ecological Adaptation on the Southern California Coast, Archaic Prehistory in the Western United States*, edited by Cynthia Irwin-Williams, Eastern New Mexico University Contributions in Anthropology 1(3):1-14, 1968.
- 45 Erlanson, Jon M., *Early Hunter-Gatherers of the California Coast*, Plenum Press, New York, 1994.
- 46 Byrd, Brian F., and L. Mark Raab, *Prehistory of the Southern Bight: Models for a New Millennium*, in *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp. 215-227, 2007.
- 47 Homburg, Jeffrey A., John G. Douglass, and Seeths N. Reddy (editors), *Paleoenvironment and Culture History, People in a Changing Land: The Archaeology and History of the Ballona in Los Angeles*, California, Volume 1, series edited by D.R. Grenda, R. Ciolek-Torello and J.H. Altschul. Statistical Research, Redlands, California, 2014.
- 48 Raab, L. Mark, Judith F. Porcasi, Katherine Bradford, and Andrew Yatsko, *Debating Cultural Evolution: Regional Implications of Fishing Intensification at Eel Point, San Clemente Island*, *Pacific Coast Archaeological Society Quarterly* 31(3):3-27, 1995.

The Late Period is associated with the florescence of the Gabrielino, who are estimated to have had a population numbering around 5,000 in the pre-contact period. The Gabrielino occupied what is presently Los Angeles County and northern Orange County, along with the southern Channel Islands, including Santa Catalina, San Nicholas, and San Clemente.<sup>49</sup> This period saw the development of elaborate trade networks and use of shell-bead currency. Fishing became an increasingly significant part of subsistence strategies at this time, and investment in fishing technologies, including the plank canoe, are reflected in the archaeological record.<sup>50,51</sup> Settlement at this time is believed to have consisted of dispersed family groups that revolved around a relatively limited number of permanent village settlements that were located centrally with respect to a variety of resources.

### ***Ethnographic Setting***

The ethnographic history ranges from A.D. 1542 to 1771 and is referred to as the Protohistoric period. This period covers the occupation of the area by native American tribes. The City is located in a region traditionally occupied by the Gabrielino Indians.

Traditionally, the Gabrielino occupied a large territory, including the entire Los Angeles Basin, the coast from Malibu to Aliso Creek, parts of the Santa Monica Mountains, the San Fernando Valley, the San Gabriel Valley, the San Bernardino Valley, the northern part of the Santa Ana Mountains, and much of the middle and lower Santa Ana River reaches. In addition, the Gabrielino also inhabited the islands of Santa Catalina, San Clemente, and San Nicolas. The term “Gabrielino” is a general term that refers to those Native Americans who were administered by the Spanish at the Mission San Gabriel Arcángel. Their neighbors included the Chumash and Tataviam to the north, the Juañeno to the south, and the Serrano and Cahuilla to the east. The Gabrielino are reported to have been second only to the Chumash in terms of population size and regional influence.<sup>52</sup> The Gabrielino language is part of the Takic branch of the Uto-Aztecan language family.

Trade was an important element of the Gabrielino economy. While the principal Gabrielino-produced commodity—steatite vessels from centers on Catalina Island—originated well outside the defined study region, trade in steatite items was conducted throughout local territory and involved external relations with desert, Southwestern, mountain, and coastal groups beyond Gabrielino borders.<sup>53</sup> Additionally, Olivella shell callus beads, manufactured on the northern Channel Islands by the Chumash and their

49 Kroeber, A. L., *Handbook of the Indians of California*, Dover Publications, Inc., New York, 1925, reprinted 1976.

50 Erlanson, Jon M., *Early Hunter-Gatherers of the California Coast*, Plenum Press, New York, 1994.

51 Raab, L. Mark, Judith F. Porcasi, Katherine Bradford, and Andrew Yatsko, *Debating Cultural Evolution: Regional Implications of Fishing Intensification at Eel Point, San Clemente Island*, *Pacific Coast Archaeological Society Quarterly* 31(3):3–27, 1995.

52 Bean, L.J., and C.R. Smith, *Gabrielino, in California*, edited by R.F. Heizer, pp. 538–549 *Handbook of North American Indians*, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C., 1978.

53 See **Appendix I.1** of this Recirculated Draft EIR.

predecessors, were reportedly used quite frequently as a currency or as a status symbol by the Gabrielino and other Southern California groups.<sup>54</sup>

At the time of Spanish contact in A.D. 1542, also the beginning of what is known as the Protohistoric Period (A.D. 1542 to 1771), many Gabrielino practiced a religion that was centered around the mythological figure Chinigchinich.<sup>55</sup> This religion may have been relatively new when the Spanish arrived, and at that time was spreading to other neighboring Takic groups. The Gabrielino practiced both cremation and inhumation of their dead. A wide variety of grave offerings, such as stone tools, baskets, shell beads, projectile points, bone and shell ornaments, and other skins, were interred with the deceased.

Coming ashore on Santa Catalina Island in October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino; the 1769 expedition of Portolá also passed through Gabrielino territory.<sup>56</sup> Native Americans suffered severe depopulation and their traditional culture was radically altered after Spanish contact. Nonetheless, Gabrielino descendants still reside in the greater Los Angeles and Orange County areas and maintain an active interest in their heritage.

### ***Historic Setting***

#### **Spanish Period**

Although Spanish explorers made brief visits to the region in 1542 and 1602, sustained contact with Europeans did not commence until the onset of the Spanish Period. In 1769 Gaspar de Portolá led an expedition from San Diego, passing through the Los Angeles Basin and the San Fernando Valley, on its way to the San Francisco Bay.<sup>57</sup> Father Juan Crespi, who accompanied the 1769 expedition, noted the suitability of the Los Angeles area for supporting a large settlement. This was followed in 1776 by the expedition of Father Francisco Garcés.<sup>58</sup>

In the late 18th century, the Spanish began establishing missions in California and forcibly relocating and converting native peoples as well as exposing them to diseases that they had no resistance to. Mission San Gabriel Arcángel was founded on September 8, 1771, and Mission San Fernando Rey de España on September 8, 1797. By the early 1800s, the majority of the surviving Gabrielino had entered the mission system, either at San Gabriel or San Fernando. Mission life offered some degree of security in a time when

54 See **Appendix I.1** of this Recirculated Draft EIR.

55 Bean, L.J., and C.R. Smith, *Gabrielino, in California*, edited by R.F. Heizer, pp. 538–549 *Handbook of North American Indians*, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C., 1978.

56 Bean, L.J., and C.R. Smith, *Gabrielino, in California*, edited by R.F. Heizer, pp. 538–549 *Handbook of North American Indians*, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C., 1978.

57 McCawley, William, *The First Angelinos: The Gabrielino Indians of Los Angeles*, Malki Museum Press, Banning, California, 1996.

58 Johnson, J. R., and D. D. Earle, *Tataviam Geography and Ethnohistory*, *Journal of California and Great Basin Anthropology*, Vol. 12, No. 2, pp. 191–214, 1990.

traditional trade and political alliances were failing and epidemics and subsistence instabilities were increasing. This lifestyle change also brought with it significant negative consequences for Gabrielino health and cultural integrity.

A Gabrielino village, or “rancheria” (known as Guaspel, Guasna, or Gaucha), appears to have been located northwest of the City. Based on mission baptism records, the rancheria appears to have been occupied from about 1790 to 1820. At least 193 people are known to have lived at the rancheria and been baptized. Records suggest that recruitment into the mission system did not occur until native populations in closer proximity to Mission San Gabriel had been assimilated, and after grazing expanded into the vicinity of the Project area, bringing native inhabitants of the region into closer contact with Spanish-era ranchers.

A 1938 map titled The Kirkman-Harriman Pictorial and Historical Map of Los Angeles County 1860 A.D.-1937 A.D. (Kirkman map) depicts approximate locations of Gabrielino villages in Los Angeles. It depicts the location of unnamed villages about 2 to 5 miles north of the Project area, but does not show any roads, landforms, or locations overlapping with the Project area.

#### Mexican Period

After Mexico gained its independence from Spain in 1821, Los Angeles became the capital of the California territory in 1835.<sup>59</sup> Mexico continued to promote settlement of California with the issuance of land grants. In 1833, Mexico began the process of secularizing the California missions, reclaiming the majority of mission lands, and redistributing them as land grants throughout California. According to the terms of the Secularization Law of 1833 and Regulations of 1834, at least a portion of the lands would be returned to the Native populations, but this did not always occur.<sup>60</sup> Because of the disbursement that the Gabrielino populations suffered during the Mission period no land was returned to the Gabrielino Tribes.

During the Mexican Period, many ranchos continued to be used by settlers for cattle grazing. Hides and tallow from cattle became a major export for Mexican settlers in California, known as Californios, many of whom became wealthy and prominent members of society. The Californios led generally easy lives, leaving the hard work to vaqueros and Indian laborers.<sup>61,62</sup>

<sup>59</sup> Gumprecht, Blake, *Los Angeles River: Its Life, and Possible Rebirth*, The Johns Hopkins University Press, Baltimore, 1999, reprinted 2001.

<sup>60</sup> Milliken, Randall, Laurence H. Shoup, and Beverly R. Ortiz, *Ohlone/Costanoan Indians of the San Francisco Peninsula, and their Neighbors, Yesterday and Today*, prepared by Archaeological and Historical Consultants, Oakland, California, prepared for National Park Service Golden Gate National Recreation Area, San Francisco, California, June 2009.

<sup>61</sup> Pitt, Leonard, *The Decline of the Californios: A Social History of the Spanish-speaking Californians, 1846-1890*, University of California Press, Berkeley, 1994.

<sup>62</sup> Starr, Kevin, *California: A History*, Modern Library, New York, 2007.

#### American Period

Mexico ceded California to the United States as part of the Treaty of Guadalupe Hildalgo in 1848. California officially became one of the United States in 1850. While the treaty recognized the right of Mexican citizens to retain ownership of land granted to them by Spanish or Mexican authorities, the claimant was required to prove their right to the land before a patent was given. The process was lengthy and generally resulted in the claimant losing at least a portion of their land to attorney’s fees and other costs associated with proving ownership.<sup>63</sup>

When the discovery of gold in northern California was announced in 1848, an influx of people from other parts of North America flooded into California and the population of Los Angeles tripled between 1850 and 1860. The increased population led to additional demand of the Californios’ cattle. As demand increased, the price of beef skyrocketed and Californios reaped the benefits. However, a devastating flood in 1861, followed by droughts in 1862 and 1864, led to a rapid decline of the cattle industry; over 70 percent of cattle perished during these droughts.<sup>64,65</sup>

These natural disasters, coupled with the burden of proving ownership, caused many Californios to lose their lands during this period. Former ranchos were subsequently subdivided and sold for agriculture and residential settlement.<sup>66,67</sup>

During the rancho period, the City was part of the *Rancho Aguaje de la Centinela* and the *Rancho Sausal Redondo*. A year after Mexico gained independence from Spain and control of California in 1822, Los Angeles resident Antonio Avila received a land grant for *Rancho Sausal Redondo* and grazed cattle there as well. The rancho encompassed the areas that are now the Cities of Redondo Beach, Inglewood, Hawthorne, El Segundo, Lawndale, Manhattan Beach and Hermosa Beach. In 1834, Ygnacio Machado, one of the original leather jacket soldiers that escorted settlers to Los Angeles, built the Centinela Adobe. The Centinela Adobe, located approximately 2.5 miles from the Project area was in the center of what became a 2,200-acre ranch on a portion of the *Rancho Sausal Redondo*. Machado had moved onto what he claimed was still public land, which was granted to him as the *Rancho Aguaje de la Centinela*. Soon after, Machado traded the *Rancho Aguaje de la Centinela* for a keg of whiskey and a home in the Pueblo of Los Angeles. The property traded hands many times and was eventually acquired by a Scottish noble man named Robert Burnett who eventually added the much larger *Rancho Sausal Redondo* to his holdings, once again combining the ranchos. Burnette eventually returned to Scotland and leased the ranch to a Canadian immigrant who was considered by many to be the founding father of Inglewood: Daniel Freeman. In spite

<sup>63</sup> Starr, Kevin, *California: A History*, Modern Library, New York, 2007.

<sup>64</sup> McWilliams, Carey, *Southern California: An Island on the Land*, Gibbs Smith, Layton, Utah, 1946.

<sup>65</sup> Dinkelspiel, Frances, *Towers of Gold*, St. Martin’s Press, New York, 2008.

<sup>66</sup> Gumprecht, Blake, *Los Angeles River: Its Life, and Possible Rebirth*, The Johns Hopkins University Press, Baltimore, 1999, reprinted 2001.

<sup>67</sup> McWilliams, Carey, *Southern California: An Island on the Land*, Gibbs Smith, Layton, Utah, 1946.

of drought and other hardship Freeman successfully farmed barley on the ranch and purchased it from Burnette with gold in 1885. Freeman went on to become a major land developer in Inglewood.<sup>68</sup>

Centinela Springs (California Historical Landmark 363), or *Aguaje de Centinela*, was a valued source of spring water for the *Rancho Aguaje de la Centinela* and the spring is described as continuously existing since the Pleistocene Era. The spring is memorialized and is still located at the corner of Centinela Avenue and Florence Boulevard, approximately 2 miles north of the Project area.<sup>69</sup>

#### 4.13.5.2 Adjusted Baseline

This section assumes the Adjusted Baseline Environmental Setting as described in **Section 4.0: Environmental Impact Analysis, 4.0.4: Adjusted Baseline**. Related to tribal cultural resources, the changes associated with the Adjusted Baseline projects include excavation and construction of new uses on the Hollywood Park Specific Plan (HPSP) site.

There is no evidence that development in the HPSP would affect the baseline for analysis of the tribal cultural resources. No tribal resources have been discovered and documented during construction of the Adjusted Baseline projects that would provide additional information on the presence or sensitivity of these resources in the area.

#### 4.13.5.3 Project Setting

The proposed Project is located within the fully urbanized City, and thus includes a high degree of development disturbance. The proposed Project would connect to the Metro K Line Downtown Inglewood station at the northern end of the Project alignment. The guideway alignment is elevated and travels from the southeast corner of Market Street and Florence Avenue southwest towards the corner of Market Street and Regent Street where it runs along the center of Market Street until it turns east on Manchester Boulevard. The guideway would extend from the station, situated diagonally over the current location of the retail commercial center on the northeast corner of Market Street and Florence Avenue, and travel south through downtown Inglewood along Market Street, where it be adjacent to existing commercial retail, office, restaurant, parking, residential, and mixed uses. The guideway would turn east onto Manchester Boulevard and be bordered by commercial retail, office, mixed-use, and residential uses on both sides of the Manchester Boulevard segment. After turning south onto Prairie Avenue, the guideway would be bordered by commercial and multifamily residential uses to the west, while uses to the east include commercial/recreational uses associated with the Forum and entertainment, retail, and residential uses under development within the HPSP as part of the Los Angeles Stadium and Entertainment District (LASED). The guideway would terminate at the intersection of Prairie Avenue and Hardy Street and the proposed Prairie Avenue/Hardy Street Station just north of Hardy Street.

<sup>68</sup> Kielbasa, John, 1998. *Historic Adobes of Los Angeles County*. Dorrance Publishing Co. Pittsburg, Pennsylvania.

<sup>69</sup> Office of Historic Preservation, 2019. <http://ohp.parks.ca.gov/ListedResources/Detail/363>. Accessed January 9, 2019.

There are no known tribal resources within the footprint of the proposed Project. However, as part of the AB 52 tribal consultation process,<sup>70</sup> it was noted that the existing networks of major roadways followed historic and prehistoric trading routes in the area that were used by Native American tribes that resided in the area and along the west coast. It was added that there are known streams to the east and trading routes to the west. Significant among these historic and pre-historic trading routes were those that Rancho Sausal Redondo (translated as “round clump of willows”), Rancho Ajuaje de la Centinela (the name means “Sentinel of Waters” in Spanish, and refers to the artesian water in the area exemplified by Centinela Springs).<sup>71</sup> Rancho Ajuaje de la Centinela included parts of present-day Westchester and Inglewood; and Rancho Centinela included the present-day cities of El Segundo, Gardena, Hawthorne, Hermosa Beach, Inglewood, Lawndale, Manhattan Beach, and Playa del Rey.

The natural steams of the area near the La Brea tar pits were used to collect materials that would line baskets and boats. The traditional landscape, which including the tribal trading routes, have numerous burial sites that have been discovered as part of other projects and excavations in the area. The tribal traditions were to bury individuals who died on the trading route at the location of their passing.

#### 4.13.6 THRESHOLDS OF SIGNIFICANCE

Criteria outlined in Appendix G of the *CEQA Guidelines* were used to determine the level of significance of impacts to tribal cultural resources. A project would have a significant impact if it would:

- Threshold TCR-1:** Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
- i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or
  - ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

<sup>70</sup> AB 52 Consultation Summary, Meridian Consultants LLC, February 6, 2019 (refer to **Appendix P.2**).

<sup>71</sup> Centinela Springs was registered as Historical Landmark on October 9, 1939 and is located in the City of Inglewood. It’s description on the Office of Historic Preservation (OHP) website notes that bubbling springs once flowed here from their source in a deep water basin that has existed continuously since the Pleistocene Era. Prehistoric animals, Indians, and early Inglewood settlers were attracted here by the pure artesian water. The springs and valley were named after sentinels guarding cattle in the area.

### 4.13.7 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

**Impact TCR-1:** Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or
- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

For purposes of this impact analysis, a Tribal Cultural Resources (TCR) is considered a site, feature, place, cultural landscape, sacred place, or object which is of cultural value to a California Native American Tribe and is either on or eligible for the California Register or a local historic register.

As previously noted, the Tribe shared with the City that the location of the proposed Project may be surrounded by historic and pre-historic trading routes and village activity. Tribal members described historical landmarks in the region, including Rancho Sausal Redondo (translated as “round clump of willows”) and Rancho Ajuaje de la Centinela (translated as “Sentinel of Waters,” and refers to the artesian water in the area exemplified by Centinela Springs),<sup>72</sup> which included parts of present-day Westchester and Inglewood, and Rancho Centinela, which included the present-day cities of El Segundo, Gardena, Hawthorne, Hermosa Beach, Inglewood, Lawndale, Manhattan Beach, and Playa del Rey. The Tribe further added that there are known streams to the east and trading routes to the west of the proposed Project that could contain TCRs.<sup>73</sup> The Tribe stated that, due to these trading routes and historical activity centers and the tribal tradition of burying their deceased along the routes and near waterways over thousands of years, these activities could result in the proposed Project having a high sensitivity for TCRs and human remains.

<sup>72</sup> Centinela Springs was registered as Historical Landmark on October 9, 1939 and is located in the City of Inglewood. It’s description on the OHP website notes that bubbling springs once flowed here from their source in a deep water basin that has existed continuously since the Pleistocene Era. Prehistoric animals, Indians, and early Inglewood settlers were attracted here by the pure artesian water. The springs and valley were named after sentinels guarding cattle in the area.

<sup>73</sup> See **Appendix P.2** of this Recirculated Draft EIR.

The Tribe explained that railroads were placed on top of traditional tribal trade routes due to the favorable topographical conditions of the paths, having been flattened by human travel over thousands of years.

Inland and coastal waterways, the Tribe described, create unique habitats and riparian corridors that provide an abundance of food and medicine resources along with aesthetically peaceful areas with running water, shade trees, and shelter. The Tribe stated that areas near watercourses and water bodies housed seasonal or permanent hamlets, seasonal or permanent trade depots, ceremonial and religious prayer sites, and burials and cremation sites of their ancestors. Larger water bodies were high attractants for human activity and the banks and shores of these water bodies have a higher-than-average potential for encountering TCRs of artifacts and human remains during ground disturbing activities. A waterway immediately east of the proposed Project is a landscape feature that was heavily used for life sustenance, homesites, ceremonies, and regular daily activities.

Since the Project area was a land area of confluence, it would have been heavily used for human travel, movement of trade items, visiting of family, going to ceremonies, accessing recreation areas, and accessing foraging areas. Further, within and around these routes contained seasonal or permanent ramadas or trade depots, seasonal and permanent habitation areas, and often still contain isolated burials and cremations from Tribal members who died along the trail. These isolated burials are not associated with a village community burial site or ceremonial burial site, rather the location is simply where the person died and was buried where they died. Therefore, isolated burials are more concentrated and likely to occur in proximity to Tribal trade routes, particularly near major trade routes.

Because the proposed Project is located within a known area of historic and pre-historic trading routes and village activity, adjacent to sacred water courses, and within a sacred landscape for ceremonies and homesites, the Tribe indicated that there is a high potential to impact TCRs still present within the soil from the thousands of years of prehistoric activities that occurred within and around these Tribal cultural landscapes.

#### **Construction**

Implementation of the proposed Project would include demolition, grubbing, and grading, possible subterranean utility relocation and installation, and excavation and installation of piles for the guideway and stations, including structural support columns and excavations for guideway and station foundations, and, as part of the construction of support facilities, including the maintenance and storage facility (MSF) and power distribution system (PDS) substations.

Historic maps provided to the City by the Tribe were reviewed as part of the background research for the proposed Project to identify previous geographical features and historic land uses, including the location

#### 4.12 Tribal Cultural Resources

of historical Native American trading routes and villages.<sup>74</sup> Because the Project alignment is located in the vicinity of areas identified during the AB 52 tribal consultation, there may be unanticipated discovery of TCRs as defined in Public Resources Code Section 21074. As such, there is the potential for loss of artifact and TCR and/or the diminishment in value to the Tribe of TCRs to occur during ground disturbing activities. As such, the proposed Project could result in a substantial adverse change in the significance of a TCR pursuant to the criteria in subdivision (c) of PRC Section 5024.1. These potential impacts would be potentially significant.

During the Rancho period, the settlers resided near Centinela Creek north of the proposed Project. The likelihood of unmarked graves associated with the Rancho period is low as the preference would have been to bury family members at the Mission or in the Pueblo near the church. The area was developed around the turn of the century, at which time (i.e., in 1905) the Inglewood Park Cemetery was established. The cemetery is still in operation and located near the proposed Project at the northeast corner of Manchester Boulevard and Prairie Avenue. Because the cemetery is close by, available, and in use, the likelihood of unmarked historic-age graves is low. Furthermore, lands within the footprint of the proposed Project are not known to contain any unmarked graves or human remains. However, due to the current development and disturbance in the cumulative context area, it is not currently possible to identify any sites or resources that may exist subsurface.

Ground disturbing activities that would be employed during construction of the proposed Project may encounter buried human remains. As a result, these activities may disturb human remains, including those interred outside of dedicated cemeteries. Therefore, the loss of any previously unknown human remains, including native American remains, may be significant, and the proposed Project would have a potentially significant impact.

#### **Operation**

While the operations of the proposed Project would introduce different land uses, these uses would not involve activities related to ground disturbance. As such, impacts related to a substantial adverse change in the significance of a TCR that would occur from the operation of the proposed Project would be less than significant.

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<sup>74</sup> See **Appendix P.2**.

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#### **Mitigation Measures**

As indicated previously, impacts related to TCRs during ground disturbing construction activities would be potentially significant. The following Mitigation Measures (MMs) have been identified and are based on information and suggestions received from the Tribe during the AB 52 consultation process with the City.

#### **Construction**

##### **MM 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 contractor, 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 AB 52 (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(s) with the qualified archaeologist and Native American Monitor 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 the Native American Monitor. 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.

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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 Public Resources Code 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.

MM TCR-2 through MM TCR-5 will supplement MM TCR-1.

**MM TCR-2: Monitoring and Mitigation Program.**

Prepare, design, and implement an Archaeological 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.

**MM 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 Archaeological Monitoring and Mitigation Program as outlined in **MM TCR-2**, for all construction personnel conducting, supervising, or

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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.

**MM 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 of potential ground-disturbing activities, 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 contractor 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

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archaeologist in consultation with the City and contractor, 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.

#### MM 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 5097.98<sup>75</sup> and Health and Safety Code Section 7050.5.<sup>76</sup> Additionally, the contractor shall notify the City, and the tribal cultural resources monitor and archaeological monitor.

<sup>75</sup> NAGPRA, Title 43. Public Lands: Interior, Subtitle A. Office of the Secretary of the Interior, Part 10. Native American Graves Protection and Repatriation Regulations, § 5097.98 – Notification of discovery of Native American human remains, descendants; disposition of human remains and associated grave goods.

<sup>76</sup> California / Health and Safety Code - HSC / CHAPTER 2. General Provisions [7050.5. - 7055.] / Section 7050.5.

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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 remains (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 landowner 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

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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. The Tribe shall approve additional types of documentation 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.

#### 4.12 Tribal Cultural Resources

##### Operation

No mitigation is required during operation of the proposed Project.

##### Level of Significance after Mitigation

##### Construction

With implementation of **MMs TCR-1, TCR-2, TCR-3, TCR-4, and TCR-5**, potentially significant impacts to TCRs, including related, unanticipated discovery of human remains, would be reduced to a level that is less than significant. These measures would work to prevent the destruction and loss of sensitive TCRs and ensure the proper disposition of human remains.

##### Operation

There are no significant impacts associated with the operation of the proposed Project; impacts would be less than significant.

#### 4.13.8 CUMULATIVE IMPACTS

In addition to the proposed Project, there are numerous projects within the City of Inglewood and within the corresponding ethnographic territory of the Gabriellino Tribe, 74 of which are in the City of Inglewood, which have been taken into consideration when developing the cumulative context, as described in **Section 4.0, 4.0-5: Cumulative Assumptions**.

The closest active cumulative projects are the SoFi Stadium and associated developments, located adjacent to the proposed Project east of Prairie Avenue, and the Inglewood Basketball and Entertainment Center (Intuit Dome) located south of the proposed Project along Century Boulevard.

#### Tribal Cultural Resources

The City implements the AB 52 process on all projects as required CEQA Section 21080.3.1.<sup>77</sup> This requires that prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project, the City, as lead agency, shall begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if: (1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe, and (2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation. Further, within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a

<sup>77</sup> CEQA Section 21080.3.1.

#### 4.12 Tribal Cultural Resources

project, the City, as lead agency provides formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice. Based on the individual consultations with Tribes, the City incorporates into the conditions and mitigation of each project, as applicable, considerations for the protection of TRCs.

The cumulative context for TRCs is within the Gabrielino Tribal territory which encompasses land within Los Angeles County north to Thousand Oaks, east to Pomona, west to the coast and south to Long Beach. Their territory also extends into Orange County as far south as Costa Mesa. The City is included within the Gabrielino Tribal territory and has been subject to historic development within the City since the rancho period, with more wide scale development occurring at the turn of the century. The Gabrielino Tribal territory has been subject to wide scale development and redevelopment projects over the past several decades and is currently experiencing a high level of redevelopment projects. Known Tribal village locations, trade routes, and known significant prehistoric archaeological sites that have a higher potential to represent a TCR are mapped and documented between 2 and 5 miles from the proposed Project. As such, development in these areas could have a significant impact to a TCR. Cumulatively, the large amount of development within the Tribal territory, especially development within known village locations, trade routes, and known significant prehistoric archaeological sites could have a cumulatively significant impact to TRCs. All related projects would, like the proposed Project, be required to comply with regulatory requirements governing TRCs, including consultation with California Native American Tribes where required under AB 52. Should an impact be identified, the related projects would be required to comply with PRC section 21084.3, which would require avoidance and preservation or mitigation as defined in PRC section 21084.3(b).

As described previously, construction of the proposed Project could result in a potentially significant impact on a previously unknown TRCs. While there are no TRCs identified within the proposed Project, the City has consulted with Tribal representatives and recognizes the potential sensitivity.

Some of the cumulative development projects in the vicinity of the proposed Project are near historical Native American trade routes or villages or waterways and could result in potentially significant due to substantial adverse changes in the significance of TRCs. Prior to mitigation, the proposed Project would result in similar potentially significant impacts. Cumulatively, this large amount of development within the Tribal territory could have a cumulatively significant impact to TRCs.

Based on the above considerations, the proposed Project, in conjunction with cumulative development within the vicinity and in the City, could result in cumulatively significant impacts to TRCs. However, because the proposed Project would include mitigation to prevent or substantially minimize the destruction or loss of TRCs, consistent with the mitigation measures recommended by the Tribe through

#### 4.12 Tribal Cultural Resources

the Project's AB 52 consultation, the proposed Project's incremental contribution to this potential cumulatively significant impact would be less than cumulatively considerable.

With regulatory adherence and incorporation of required mitigation the proposed Project would not result in a cumulatively considerable impact on TRCs.

#### Unknown Human Remains

In regard to impacts to previously unknown human remains, including those buried outside a formal cemetery, there are no known burial grounds or unmarked cemeteries within the footprint of the proposed Project or a 0.5-mile radius based on the SLF search and sensitivity analysis for cultural resources. The proposed Project and other cumulative projects would be required to comply with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98 (as amended by AB 2641) related to the proper disposition of human remains.

The related projects would, like the proposed Project, be required to comply with regulatory requirements governing TRCs, including consultation with California Native American Tribes where required under AB 52. Should an impact be identified, the related projects would be required to comply with PRC Section 21084.3 which would require avoidance and preservation or mitigation as defined in PRC Section 21084.3(b). As such, with regulatory adherence and incorporation of required mitigation, other area projects in combination with the proposed Project would have a less-than-significant cumulative impact on human remains associated with TRCs.

#### 4.13.9 CONSISTENCY WITH CITY OF INGLEWOOD GENERAL PLAN

The City's General Plan does not identify any goals or policies related specifically to TRCs. Accordingly, the proposed Project would not conflict with any goals, objectives, strategies, or policies of the City's General Plan related to this topic area.

## 4.14 UTILITIES AND SERVICE SYSTEMS

### 4.14.1 INTRODUCTION

This section of the Recirculated Draft Environmental Impact Report (Recirculated Draft EIR) addresses the available capacities of existing utility-related infrastructure, including water and wastewater services, storm water drainage, dry utilities (electrical, natural gas, and telecommunications), and solid waste management, as well as the potential for conflicts between the proposed Inglewood Transit Connector Project (proposed Project) and utility-related infrastructure that would result in environmental impacts. The existing conditions relevant to utilities in the proposed Project area are described, along with the methodology and the regulatory framework that guided the evaluation of utility-related infrastructure. Impacts to utilities and service systems that would result from the proposed Project are identified. Information from the Gannett Fleming *Utilities Engineering Report*, August 2021, is incorporated into **Appendix Q: Utility Impact Data**.

The Revised Initial Study (included in **Appendix A.2** of this Recirculated Draft EIR) prepared prior to preparation of the December 2020 Draft EIR utilizes the California Environmental Quality Act (CEQA) Environmental Checklist to assess the Project's potential environmental impacts on utilities and service systems. For five of these screening thresholds, the Revised Initial Study found that the proposed Project would have a "Less than Significant Impact;" thus, no further analyses of these topics were required in an EIR. The following impacts do not require any additional analysis in this Recirculated Draft EIR:

- Potential impacts related to a substantial adverse effect on the proposed Project's ability to comply with wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board (LARWQCB) were determined to have a less-than-significant impact. Though the Project would generate more wastewater than is currently generated within the footprint of the Project, pollutant loads would be typical of urban wastewater already processed by the Los Angeles Bureau of Sanitation's Joint Water Pollution Control Plant (JWPCP) and no significant impacts to wastewater treatment requirements of the LAWQCB would occur.
- Potential impacts related to a substantial adverse effect on the permitted capacity of water or wastewater treatment facilities were determined to have a less-than-significant impact. Although water and wastewater lines may need to be relocated, no aspect of the construction or operation of the proposed Project would require new or expanded water or wastewater treatment facilities.
- Potential impacts related to a substantial adverse effect on the availability of water supplies were determined to have a less-than-significant impact. The City's Urban Water Management Plan determined that sufficient water supplies existed so that a nonwater-intensive project, such as the Project, would not result in a strain on existing water supplies. Because water supplies in the area are more than sufficient, impacts would be less than significant.

- Potential impacts related to a substantial adverse effect on the capacity of wastewater treatment provider which serves or may serve the proposed Project to accommodate the projected demand in addition to the provider's existing commitments were determined to have a less-than-significant impact. The proposed Project includes an elevated guideway, stations and support facilities (maintenance and storage facility [MSF] and Power Distribution System [PDS] substations) that would not involve water-intensive activities. Therefore, impacts regarding wastewater treatment would be less than significant.
- Potential impacts related to a substantial adverse effect on the permitted capacity of Los Angeles County (County) landfills that would accommodate the proposed Project's solid waste disposal needs were determined to have a less-than-significant impact. The total remaining permitted inert waste capacity in the County is sufficient to accommodate the proposed Project's solid waste disposal needs from construction and demolition activities. Further, the proposed Project would comply with federal, State of California (State), and local statutes and regulations related to solid waste and no significant impacts to landfill capacity would occur.
- Potential impacts related to a substantial adverse effect on the proposed Project's ability to comply with federal, State, and local statutes and regulations related to solid waste were determined to have a less-than-significant impact. The proposed Project would comply with federal, State, and local statutes and regulations related to solid waste and no significant impact related to compliance with solid waste statutes and regulations would occur.

After circulation of the December 2020 Draft EIR for public review, the City revised the design of the proposed Project in response to consultation with key stakeholders in the community and comments received on the December 2020 Draft EIR. Specific changes to the proposed Project include raising the height of the ATS guideway along Market Street to preserve existing views of historic buildings, relocating the Prairie Avenue/Pincay Drive Station to the southwest corner of Prairie Avenue and Manchester Boulevard, redesign of the proposed MSF to allow this facility to be located on the proposed site with a new Vons store, and realignment of the guideway and stations on Prairie Avenue to the west side of Prairie Avenue. As it relates to impacts to utilities, these changes include updated construction and operational details which increased utility line conflicts with proposed Project columns. However, impacts would remain less than significant with mitigation similar to the December 2020 Draft EIR.

These changes to the design of the proposed Project do not create the potential for significant impacts related to the impacts above. The revised proposed Project would result in additional property acquisitions that would require demolition prior to construction of the proposed Project. Additionally, the revised proposed Project would include a Vons store replacement which would be developed prior to construction of the proposed Project. These changes would not alter the level of significance for the impacts discussed above.

Impacts found to be less than significant are further discussed in **Section 6.0: Other Environmental Considerations** of this Recirculated Draft EIR.

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Recirculated Draft EIR.

#### 4.14.2 METHODOLOGY

The analysis contained in this section represents identification of existing utilities based on information and record drawings acquired from utility providers and the City. Obtained data included existing and planned major utilities within the area of the proposed Project. Data and utility maps were prepared for major identified utilities using existing information. A distance of 10 feet was used to identify utilities that may be impacted from construction activities that involve excavation. All utility locations are approximate based on best available map data. Available data did not provide for exact utility locations in terms of plan and profile; rather, exact utility locations would be determined prior to construction by potholing, utilizing ground penetrating radar, and/or other methods.

The locations of Project components have been compared to the locations of existing utility infrastructure to identify potential points of conflict. This analysis also considers the ability of the proposed Project to avoid or reduce demand placed on utilities and service systems through conservation programs and efficiency features.

#### 4.14.3 REGULATORY FRAMEWORK

##### 4.14.3.1 Federal Regulations and Directives

###### *Clean Water Act*

The Clean Water Act<sup>1</sup> established the basic structure for regulating discharges of pollutants into “waters of the U.S.” The act specifies a variety of regulatory and nonregulatory tools to manage stormwater runoff. Clean Water Act Section 402 is relevant to drainage within the footprint of the proposed Project. Section 402 regulates point- and nonpoint-source discharges to surface waters through the National Pollutant Discharge Elimination System (NPDES) program. In California, the State Water Resources Control Board (SWRCB) oversees the NPDES program, which is administered by the regional water quality boards (RWQCBs). The NPDES program provides for both general permits (those that cover a number of similar or related activities) and individual permits.

1 USEPA, *Summary of the Clean Water Act*, accessed September 2021, <https://www.epa.gov/laws-regulations/summary-clean-water-act>.

#### *Safe Drinking Water Act*

The United States Environmental Protection Agency (USEPA) administers the Safe Drinking Water Act<sup>2</sup> (SDWA), which is the primary federal law that regulates the quality of drinking water and establishes standards to protect public health and safety. The Department of Health Services (DHS) implements the requirements of the SDWA and oversees public water system quality Statewide. DHS establishes legal drinking water standards for contaminants that could threaten public health.

#### *National Pollutant Discharge Elimination System*

The NPDES<sup>3</sup> is a program created to implement the Clean Water Act. In November 1990, USEPA published final regulations that establish requirements for specific categories of industries, including construction projects that encompass greater than or equal to 5 acres of land. The Phase II Rule became final in December 1999, expanding regulated construction sites to those greater than or equal to 1 acre. The regulations require that stormwater and nonstormwater runoff associated with construction activity, which discharges either directly to surface waters or indirectly through municipal separate storm sewer systems (MS4), must be regulated by an NPDES permit.

The EPA has delegated management of California’s NPDES program to the SWRCB and the nine RWQCB offices, which grant permits to regulate point source discharges of industrial and municipal wastewater into the waters of the United States. The NPDES program was established in 1972 to regulate the quality of effluent discharged from easily detected point sources of pollution such as wastewater treatment plants and industrial discharges. The 1987 amendments to the Clean Water Act recognized the need to address nonpoint-source stormwater runoff pollution and expanded the NPDES program to operators of municipal separate MS4s, construction projects, and industrial facilities.<sup>4</sup>

The State of California adopted an NPDES Permit for General Construction Activity (Construction General Permit) on September 2, 2009 (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ).<sup>5</sup> The last Construction General Permit amendment became effective on February 16, 2012. The Construction General Permit regulates construction site storm water management. Dischargers whose projects disturb one or more acres of soil, or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the general permit for discharges of storm water associated with construction activity.

2 USEPA, *Safe Drinking Water Act (SDWA)*, accessed September 2021, <https://www.epa.gov/sdwa>.

3 USEPA, *National Pollutant Discharge Elimination System (NPDES)*, accessed September 2021, <https://www.epa.gov/npdes>.

4 *Clean Water Act, 33 Code of Federal Regulations*, sec. 402(p) (2008).

5 State Water Resources Control Board (SWRCB), *Storm Water*, accessed September 2021, [https://www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.shtm](https://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtm).

The proposed Project is under the jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB), also known as Region 4. The SWRCB administers the NPDES permit program regulating stormwater from construction activities for projects greater than 1 acre in size. This is known as the General Permit for Storm Water Discharges Associated with Construction Activities, Order No. 2009-0009-DWQ, as amended by Order No. 2012-0006-DWQ, NPDES No. CAS000002.<sup>6</sup>

The main compliance requirement of NPDES permits is the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The purpose of a SWPPP is to identify potential pollutants and identify and implement appropriate stormwater pollution prevention measures to reduce or eliminate discharge of pollutants to surface water from stormwater and nonstormwater discharges. Stormwater BMPs to be implemented during construction and grading, as well as post-construction BMPs, will be outlined in the SWPPP prepared for the proposed Project.

#### **Resource Conservation and Recovery Act**

The Resource Conservation and Recovery Act<sup>7</sup> (RCRA) is the nation's primary law governing the disposal of solid and hazardous waste. The RCRA set national goals for reducing the amount of waste generated and for ensuring that wastes are managed in an environmentally sound manner. The Solid Waste Program encourages states to develop comprehensive plans to manage nonhazardous industrial solid waste and municipal solid waste, sets criteria for municipal solid waste landfills, and prohibits the open dumping of solid waste. RCRA regulations encourage source reduction and recycling and promote the safe disposal of municipal waste.

#### **4.14.3.2 State Regulations and Directives**

##### **State Drinking Water Act**

The 2014 transfer of the California Department of Public Health Drinking Water Program<sup>8</sup> (DWP) to the SWRCB brought with it not only the primary enforcement authority to enforce federal and State SDWAs, and the regulatory oversight of approximately 8,000 public water systems throughout California, but also the responsibility for completing the next Safe Drinking Water Plan.

With the transfer of DWP to the SWRCB, while the role and responsibility remained unchanged, the name was changed to the Division of Drinking Water (DDW). DDW has been granted primary enforcement responsibility for the federal SDWA. California enacted its own SDWA. The DDW is responsible for

<sup>6</sup> SWRCB, *Storm Water*, accessed September 2021, [https://www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.shtml](https://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml).

<sup>7</sup> USEPA, *Resource Conservation and Recovery Act (RCRA) Laws and Regulations*, accessed September 2021, <https://www.epa.gov/rcra>.

<sup>8</sup> SWRCB, "Drinking Water Programs," accessed September 2021, [https://www.waterboards.ca.gov/drinking\\_water/programs/](https://www.waterboards.ca.gov/drinking_water/programs/).

implementing the federal SDWA and its updates, as well as California statutes and regulations related to drinking water. As part of their efforts, the DDW inspects and provides regulatory oversight for public water systems within California. The RWQCB also has the responsibility for protecting the beneficial uses of the State's waters, including groundwater, and these include municipal drinking water supply, as well as various other uses.

California Administrative Code Title 22,<sup>9</sup> establishes DDW authority and stipulates drinking water quality and monitoring standards. These standards are equal to, or more stringent than, the federal standards. Public water system operators are required to monitor their drinking water sources regularly for microbiological, chemical, and radiological contaminants to show that drinking water supplies meet the regulatory requirements listed in California Code of Regulations (CCR) Title 22 as primary maximum contaminant levels.

#### **Recycled Water Policy (Policy for Water Quality Control for Recycled Water)**

The Recycled Water Policy<sup>10</sup> was first adopted in 2009, and then subsequently amended in 2013 and 2018. The purpose of the Recycled Water Policy is to increase the use of recycled water from municipal wastewater sources that meets the definition in California Water Code (CWC) section 13050(n),<sup>11</sup> in a manner that implements federal and State water quality laws. More specifically, recycled water is the reuse of treated wastewater derived from municipal sources (i.e., water that is covered under CCR Title 22, Water Recycling Criteria).<sup>12</sup> The Recycled Water Policy provides goals for recycled water use in California, guidance for use of recycled water that considers protection of water quality, criteria for streamlined permitting of recycled water projects, and requirements for monitoring recycled water for constituents of emerging concern (CECs).

#### **Title 22**

The CWC requires the DDW to establish water reclamation criteria. In 1975, the DDW prepared Title 22<sup>13</sup> regulations to satisfy this requirement. Title 22 regulates production and use of reclaimed water in California by establishing three categories of reclaimed water: primary effluent, secondary effluent and tertiary effluent. Primary effluent typically includes grit removal and initial sedimentation or settling tanks.

<sup>9</sup> California Department of Substances Control, *Official California Code of Regulations (CCR), Title 22, Division 4.5*, accessed September 2021, <https://dtsc.ca.gov/title22/>.

<sup>10</sup> SWRCB, *Recycled Water Policy*, accessed September 2021, [https://www.waterboards.ca.gov/water\\_issues/programs/water\\_recycling\\_policy/](https://www.waterboards.ca.gov/water_issues/programs/water_recycling_policy/).

<sup>11</sup> California Legislative Information, *Water Code*, accessed September 2021, [https://leginfo.ca.gov/faces/codes\\_displaySection.xhtml?lawCode=WAT&sectionNum=13050#:~:text=\(d\)%20E2%80%9CWaste%2%80%9D%20includes,nature%20prior%20to%2C%20and%20for](https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=WAT&sectionNum=13050#:~:text=(d)%20E2%80%9CWaste%2%80%9D%20includes,nature%20prior%20to%2C%20and%20for).

<sup>12</sup> SWRCB, *California Drinking Water-Related Laws*, accessed September 2021, [https://www.waterboards.ca.gov/drinking\\_water/certlic/drinkingwater/Lawbook.html](https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/Lawbook.html).

<sup>13</sup> California Department of Substances Control, *Official California Code of Regulations (CCR), Title 22, Division 4.5*, accessed September 2021, <https://dtsc.ca.gov/title22/>.

Secondary effluent is adequately disinfected, oxidized effluent, which typically involves aeration and additional settling basins. Tertiary effluent is adequately disinfected, oxidized, coagulated, clarified, filtered effluent which typically involves filtration and chlorination. In addition to defining reclaimed water uses, Title 22 also defines requirements for sampling and analysis of effluent and specifies design requirements for treatment facilities.

#### **California Green Buildings Standards Code**

Adopted in 2010, and updated annually, the California Green Building Standards Code (CALGreen) is found in Part 11, Title 24 of the CCR.<sup>14</sup> The purpose of CALGreen is to cause a reduction in GHG emissions; promote environmentally responsible, cost effective, healthier places to live and work; and reduce energy and water consumption. CALGreen identifies mandatory building measures and voluntary measures that may be incorporated into the design of buildings. Relative to water usage, CALGreen contains specific requirements for plumbing fixtures and general requirements for indoor and outdoor water usage. Effective January 1, 2017, CALGreen requires developers of newly constructed buildings to develop a waste management plan to divert 65 percent of the construction waste generated by construction. Builders or developers are required to submit a construction waste management plan to the appropriate jurisdiction's enforcement agency.

#### **Urban Water Management Planning Act**

The State of California's Urban Water Management Planning Act<sup>15</sup> of 1983 requires all public water suppliers that provide municipal and industrial water to more than 3,000 customers, or supply more than 3,000 acre-feet per year (AFY) of water, to prepare and adopt a UWMP. The UWMP must be prepared every 5 years and submitted to the Department of Water Resources (DWR) for review. A UWMP is intended to forecast future water demand and supply under normal and dry conditions. The Urban Water Management Planning Act has been modified several times in response to water shortages, droughts, and other factors. The Water Conservation Act of 2009 amended the Urban Water Management Act to call for a Statewide reduction of 20 percent in urban water use by the year 2020. An amendment in 2014 requires water suppliers to provide narrative descriptions of their water demand management measures and account for system water losses.

14 California Department of General Services, CalGreen, accessed September 2021, <https://www.dgs.ca.gov/BSC/Resources/Page-Content/Building-Standards-Commission-Resources-List-Folder/CALGreen>.  
15 California Legislature, Urban Water Management Planning Act (Division 6 Part 2.6 of the Water Code §§10610 – 10656).

#### **Senate Bill 7 of the Seventh Extraordinary Session of 2009**

SB 1 (or SB X7 1)<sup>16</sup> from the Extraordinary Legislative Session of the fall of 2009 established a statutory framework intended to achieve the co-equal goals of providing a more reliable water supply to California and restoring and enhancing the Sacramento-San Joaquin River Delta ecosystem. The co-equal goals will be achieved in a manner that protects the unique cultural, recreational, natural resource, and agricultural values of the Delta.

The Water Conservation Act of 2009 (SB X7-7) amended and repealed CWC section 10631.5 to add Part 2.55 (commencing with section 10608)<sup>17</sup> to CWC Division 6, and repealed and added Part 2.8 (commencing with section 10800) of CWC Division 6, relating to water. Specific text from CWC Part 2.55 for urban water suppliers as it relates to water conservation and water use efficiencies is listed below.

Specifically, SB X7-7 from this Extraordinary Session requires each urban retail water supplier to develop urban water use targets to help meet the 20 percent reduction goal by 2020 (20x2020), and an interim water reduction target by 2015.

#### **Model Water Efficient Landscape Ordinance, CCR Title 23, Waters Division 2, Department of Water Resources Chapter 2.7**

In 2015, Executive Order B-29-15<sup>18</sup> charged DWR with revising the 2010 MWELO to increase water efficiency standards for new and retrofitted landscapes through encouraging the use of more efficient irrigation systems, graywater usage, and stormwater capture, and by limiting the portion of landscapes that can be covered in turf. The Executive Order B-29-15 also required that agencies report on their implementation and enforcement of local ordinances.

#### **Making Conservation a Way of Life, Implementing Executive Order B-37-16**

In 2018 the California State Legislature enacted two policy bills: SB 606 and Assembly Bill (AB) 1168<sup>19</sup> to establish a new foundation for long-term improvements in water conservation goals and drought planning to adapt to the longer and more intense droughts climate change is causing in California.

16 California Legislative Information, SB-1 Public resources, accessed September 2021, [https://leginfo.ca.gov/faces/billTextClient.xhtml?bill\\_id=200920107SB1](https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=200920107SB1).

17 SWRCB, SB X7-7, accessed September 2021, <https://water.ca.gov/Programs/Water-Use-And-Efficiency/SB-X7-7>.

18 SWRCB, Governor's Conservation Executive Orders and Proclamations, accessed September 2021, [https://www.waterboards.ca.gov/water\\_issues/programs/conservation\\_portal/executive\\_orders.html](https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/executive_orders.html).

19 SWRCB, California Statutes Making Conservation a California Way of Life, accessed September 2021, [https://www.waterboards.ca.gov/water\\_issues/programs/conservation\\_portal/california\\_statutes.html](https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/california_statutes.html).

Collectively, these efforts provide a road map for all Californians to work together to ensure that we will have enough water now and in the future. The 2018 legislation applies to the actions of DWR, the SWRCB, and water suppliers.

Urban water suppliers must stay within annual water budgets based on these standards for their service areas. The 2018 legislation also supports drought planning. In urban areas, drought plans will be primarily led by local water suppliers. DWR and the SWRCB will develop recommendations to strengthen drought planning in rural areas and areas served by small water systems by coordinating with counties and other stakeholders.

#### **Sustainable Groundwater Management Act**

The Sustainable Groundwater Management Act<sup>20</sup> (SGMA) is a legislative package to establish a framework for sustainable groundwater management that can be planned for, implemented, and maintained without undesirable results in the future.

SGMA requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically over-drafted basins that will be 2040. For the remaining high and medium priority basins, 2042 is the deadline. In his signing statement, the governor emphasized that “groundwater management in California is best accomplished locally.” Through the Sustainable Groundwater Management Program, DWR provides ongoing support to local agencies through guidance and financial and technical assistance.

SGMA empowers local agencies to form Groundwater Sustainability Agencies (GSAs) to manage basins sustainably and requires those GSAs to adopt Groundwater Sustainability Plans (GSPs) for crucial groundwater basins in California.

#### **Sewer System Management Plan**

The federal Clean Water Act requires the City to adopt a wastewater facilities plan in accordance with USEPA Rules and Regulations, 40 CFR, Section 35.917. In addition, the Statewide General Waste Discharge Requirements<sup>21</sup> (WDRs) for publicly owned sanitary sewer systems requires the City to develop and implement a Sewer System Management Plan (SSMP). In 2015, the City adopted the Sewer System Management Plan in order to comply with State and federal requirements, setting forth goals and actions

20 California Department of Water Resources, “SGMA Groundwater Management,” accessed September 2021, <https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management>.

21 SWRCB, Waste Discharge Requirements Program, accessed September 2021, [https://www.waterboards.ca.gov/water\\_issues/programs/waste\\_discharge\\_requirements/](https://www.waterboards.ca.gov/water_issues/programs/waste_discharge_requirements/).

to be followed and guidelines for various activities involved in managing, operating, maintaining, repairing, replacing and expanding the sewer system.<sup>22</sup>

#### **California Water Resources Control Board Low Impact Development Policy**

The SWRCB adopted the Low Impact Development (LID) Policy<sup>23</sup> which, at its core, promotes the idea of “sustainability” as a key parameter to be prioritized during the design and planning process for future development. The SWRCB has directed its staff to consider sustainability in all future policies, guidelines, and regulatory actions. LID is a proven approach to manage stormwater. The RWQCBs are advancing LID in California in various ways, including provisions for LID requirements in renewed Phase I municipal stormwater NPDES permits.

#### **California Integrated Waste Management Act of 1989 (AB 939)**

In response to reduced landfill capacities, the State of California passed AB 939, the California Integrated Waste Management Act,<sup>24</sup> in 1989. This legislation requires cities and counties to reduce the amount of solid waste entering existing landfills through recycling, reuse, and waste prevention efforts. AB 939 also established the California Integrated Waste Management Board (CIWMB), the State agency designated to oversee, manage, and track California’s solid waste generation each year. AB 939 requires jurisdictions to maintain 50 percent waste diversion. The purpose of AB 939 is to “reduce, recycle, and reuse solid waste generated in the State to the maximum extent feasible.” AB 939 requires jurisdictions to utilize “integrated waste management,” which includes a variety of waste management practices to handle the municipal solid waste stream safely and effectively, with the least adverse impact on human health and the environment.

CalRecycle is the State of California department concerned with the State’s recycling and waste reduction efforts, including the implementation of AB 939. Officially known as the Department of Resource Recycling and Recovery, CalRecycle is a part of the California Natural Resources Agency and administers programs formerly managed by the California Integrated Waste Management Board and Division of Recycling.

22 City of Inglewood, *Sewer System Management Plan*, August 31, 2015, accessed September 2021, <https://www.cityofinglewood.org/DocumentCenter/View/986/Sewer-System-Management-Plan-PDF>.

23 SWRCB, Low Impact Development – Sustainable Storm Water Management, accessed September 2021, [https://www.waterboards.ca.gov/water\\_issues/programs/low\\_impact\\_development/](https://www.waterboards.ca.gov/water_issues/programs/low_impact_development/).

24 CalRecycle, Enforcement, accessed September 2021, <https://www.calrecycle.ca.gov/lcentral/enforcement>.

### **California Solid Waste Reuse and Recycling Access Act of 1991 (AB 1327)**

The California Solid Waste Reuse and Recycling Access Act of 1991,<sup>25</sup> as amended, requires each local jurisdiction to adopt an ordinance requiring commercial, industrial, or institutional buildings; marinas; or residential buildings having five or more living units to provide an adequate storage area for the collection and removal of recyclable materials. The sizes of these storage areas are to be determined by the appropriate jurisdictions' ordinance. If no such ordinance exists with the jurisdiction, the CalRecycle model ordinance shall take effect. The City of Los Angeles passed such an ordinance in 1997.

### **Assembly Bill 341**

AB 341,<sup>26</sup> which took effect on July 1, 2012, was designed to help meet California's recycling goal of 75 percent by the year 2020. AB 341 makes "a legislative declaration that it is the policy goal of the State that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020." AB 341 requires a business, defined to include a commercial or public entity that generates more than 4 cubic yards of commercial solid waste per week or a multifamily residential dwelling of 5 units or more to arrange for recycling services. Such business/residential development must: 1) source separate recyclable materials from the solid waste they are discarding, and either self-haul or arrange for separate collection of the recyclables; and 2) subscribe to a service that includes mixed waste processing that yields diversion results comparable to source separation.

### **Construction and Demolition Waste Materials Diversion Requirements (SB 1374)**

Construction and Demolition Waste Materials Diversion Requirements<sup>27</sup> passed in 2002 added Section 42912 to the California Public Resources Code. SB 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also requires that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.

### **Zero Waste California**

Zero Waste California is a State program launched by CalRecycle in 2002 to promote a new vision for the management of solid waste. Zero Waste provides that wasting resources is inefficient and that the efficient use of natural resources should be achieved. The concept requires maximizing existing recycling and reuse

25 California Legislative Information, California Solid Waste Reuse and Recycling Access Act of 1991 [42900 - 42912], accessed September 2021, [https://leginfo.ca.gov/faces/codes\\_displayText.xhtml?lawCode=PRC&division=30.&title=&part=3.&chapter=18.&article=1](https://leginfo.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=30.&title=&part=3.&chapter=18.&article=1).

26 CalRecycle, Mandatory Commercial Recycling, accessed September 2021, <https://www.calrecycle.ca.gov/recycle/commercial>.

27 CalRecycle, *Construction and Demolition (C&D) Diversion Informational Guide*, accessed September 2021, <https://www.calrecycle.ca.gov/Igcentral/library/canddmodel>.

efforts, while ensuring that products are designed for the environment and have the potential to be repaired, reused, or recycled. The Zero Waste California program promotes the goals of market development, recycled product procurement, and research and development of new and sustainable technologies.

### **4.14.3.3 Regional Regulations and Directives**

#### **Metropolitan Water District of Southern California Planning Efforts**

The Metropolitan Water District of Southern California (Metropolitan) is a regional wholesaler that delivers water to 26-member public agencies—14 cities, 11 municipal water districts, one county water authority—which, in turn provide water to 19 million people in Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura counties.<sup>28</sup> Metropolitan is governed by a 38-member board of directors who represent their respective member agencies ensuring each member agency is part of the governance of Metropolitan. The West Basin Municipal Water District's (WBMWD) water supply is predominantly supplied through imported water from Metropolitan,<sup>29</sup> which, in turn supplies the City with potable water (approximately 67 percent of its supply as recently as 2020).<sup>30</sup> Metropolitan has undertaken a number of planning and reporting efforts focused on regional water supply reliability, including as follows:

#### **Integrated Water Resources Plan**

The Integrated Water Resources Plan (IRP) is a blueprint for long-term water supply reliability in Southern California. It was first developed in 1996 to address the complexity of developing, maintaining, and delivering water to meet changing demands in the face of growing challenges. It established targets for a diversified portfolio of supply investments. Water Tomorrow works to balance the use of local resources and conservation with imported supplies to meet future needs.<sup>31</sup> The IRP has been updated several times since its inception.

The most recent update occurred in 2015 and focused on ascertaining how conditions have changed in the region since 2010 when the last IRP was adopted. The 2015 Update involved developing new reliability targets to meet the evolving outlook of the region's reliability needs, assessing strategies for managing

28 Metropolitan Water District of Southern California, "Overview," accessed September 2021, <http://www.mwdh2o.com/WhoWeAre/Mission/Pages/default.aspx>.

29 West Basin Municipal Water District (WBMWD), *2020 Urban Water Management Plan*, September 2021.

30 City of Inglewood, *2020 Urban Water Management Plan*, July 2021.

31 Metropolitan, "Planning Documents," accessed September 2021, <http://www.mwdh2o.com/AboutYourWater/Planning/Planning-Documents/Pages/default.aspx>.

short and long-term uncertainty and communicating technical findings. The 2015 IRP Update also identified areas where policy development and implementation approaches are needed.<sup>32</sup>

#### Urban Water Management Plan

Metropolitan's 2020 UWMP<sup>33</sup> describes and evaluates sources of water supply, efficient uses of water, demand management measures, implementation strategies and schedules, and other relevant information and programs. The plan is updated every 5 years.

Information from Metropolitan's UWMP is used by local water suppliers in the preparation of their own plans. The information included in Metropolitan's UWMP represents the district's most current planning projections of demand and supply capability developed through a collaborative process with the member agencies.

#### Water Surplus and Drought Management Plan

Metropolitan's Water Surplus and Drought Management Plan<sup>34</sup> was developed to outline policies that guide water surplus and shortage management and establish a basis for dealing with shortages in an equitable and efficient manner. It provides policy guidance for managing regional water supplies during surplus and shortage conditions. It identifies a sequence of management actions to minimize the probability of severe shortages and reduce the possibility of extreme shortages and water allocations. Each year Metropolitan evaluates available water supplies and existing water storage levels to determine the appropriate management actions identified in the WSDM Plan.

#### Long-Term Conservation Plan

Metropolitan's Long-term Conservation Plan<sup>35</sup> provides a framework for achieving the water use efficiency goals in the 2010 Integrated Resources Plan. Through market transformation, the plan seeks to reduce per capita water use 20 percent by 2020 using several key strategies:

- Providing incentives to guide consumer choice;
- Encouraging action through outreach and education;
- Developing regional technical capabilities;

<sup>32</sup> Metropolitan, "Planning Documents," accessed September 2021, <http://www.mwdh2o.com/AboutYourWater/Planning/Planning-Documents/Pages/default.aspx>.

<sup>33</sup> Metropolitan, "Planning Documents," accessed September 2021, <http://www.mwdh2o.com/AboutYourWater/Planning/Planning-Documents/Pages/default.aspx>.

<sup>34</sup> Metropolitan, "Planning Documents," accessed September 2021, <http://www.mwdh2o.com/AboutYourWater/Planning/Planning-Documents/Pages/default.aspx>.

<sup>35</sup> Metropolitan, "Planning Documents," accessed September 2021, <http://www.mwdh2o.com/AboutYourWater/Planning/Planning-Documents/Pages/default.aspx>.

- Building strategic alliances; and
- Advancing water efficiency standards.

#### West Basin Municipal Water District Planning Efforts

The WBMWD is a wholesale water agency that provides imported drinking water to 17 cities and unincorporated areas of Los Angeles County throughout its 185 square mile service area.<sup>36</sup> WBMWD currently manages a water supply portfolio that includes imported water from the Colorado River and Northern California, locally-produced recycled water, desalted groundwater and conserved water. WBMWD develops viable plans and initiatives to ensure reliability of the region's water supplies and work to reduce the region's dependence on imported water by expanding the local water supply portfolio in an economically feasible manner. As mentioned previously, WBMWD supplies the City with 80 percent of its potable water supply. WBMWD has undertaken a number of planning and reporting efforts focused on regional water supply reliability, including as follows:

#### Water Use Report

The WBMWD Water Use Report,<sup>37</sup> last completed for FY 2016–2017, outlines the WBMWD service area; accomplishments and strategies regarding finance, water recycling operations; the capital improvement program; public information; water policy and resource development; conservation; the water quality monitoring program; water use tabulations; facilities overview; and water rates.

#### Drought Rationing Plan

Based closely on Metropolitan's methodology, WBMWD's Drought Rationing Plan model,<sup>38</sup> adopted by the Board of Directors in April 2009 and amended in March 2015, determines each customer agency's share of WBMWD's allocation from MWD. Fairness in allocation and minimizing regional hardship to retail water consumers remained central themes in the development of a specific formula for allocating shortages across Southern California. The formula uses different adjustments and credits to balance impacts of shortage at the retail level, where local supplies can vary dramatically, and provide equity on the wholesale level among member agencies. It also attempts to take into account; growth in demand, local investments, changes in local supply conditions, the reduction in potable water demand from recycled water, and the implementation of water conservation programs.

<sup>36</sup> WBMWD, "About Us," accessed September 2021, <http://www.westbasin.org/about-us>.

<sup>37</sup> WBMWD, Water Use Report: Fiscal Year 2016–2017, November 9, 2017.

<sup>38</sup> WBMWD, "Reports & Plans," accessed September 2021, <http://www.westbasin.org/policy-planning/reports-plans>.

### Urban Water Management Plan

In compliance with the Urban Water Management Planning Act, WBMWD's 2020 Urban Water Management Plan<sup>39</sup> provides a detailed summary of present and future water resources and demands within WBMWD's service area and assesses West Basin's water resource needs. Specifically, the UWMP provides water supply planning for a 25-year planning period in five-year increments and identifies water supplies needed to meet existing and future demands. The demand analysis must identify supply reliability under three hydrologic conditions: an average year, a single dry year, and multiple dry years. West Basin's 2020 UWMP updates the 2015 UWMP in compliance with the requirements of the UWMPA.

### Enhanced Watershed Management Programs (EWMP)

The Los Angeles County MS4 Permit<sup>40</sup> allows Permittees the flexibility to develop Watershed Management Programs (WMPs) or Enhanced Watershed Management Programs (EWMPs) to implement the requirements of the Permit on a watershed scale through customized strategies, control measures, and best management practices (BMPs). Participation in a Watershed Management Program is voluntary and allows a Permittee to address the highest watershed priorities. The City is a Permittee to the following two EWMPs: the Ballona Creek Watershed EWMP and the Dominguez Channel Watershed Management Area EWMP.

### Los Angeles County Standard Urban Storm Water Mitigation Plan

Development in the City is subject to the Los Angeles County Standard Urban Storm Water Mitigation Plan<sup>41</sup> (SUSMP), adopted March 2000, which provides drainage regulations for specific types of development projects.

The County lists example BMPs to be implemented that would aid in stormwater drainage; examples of these include using minimum pavement widths and permeable pavement, directing of rooftop runoff to pervious areas, and including vegetated swales and strips and infiltration basins throughout the development.<sup>42</sup>

<sup>39</sup> WBMWD, *2020 Urban Water Management Plan*, June 2021.

<sup>40</sup> SWRCB, *Storm Water-Municipal Permits*, accessed September 2021, [https://www.waterboards.ca.gov/losangeles/water\\_issues/programs/stormwater/municipal/](https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/).

<sup>41</sup> SWRCB, *Standard Urban Storm Water Mitigation Plan (SUSMP)*, accessed September 2021, [https://www.waterboards.ca.gov/losangeles/water\\_issues/programs/stormwater/susmp/susmp\\_details.shtml](https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/susmp/susmp_details.shtml).

<sup>42</sup> County of Los Angeles, *Standard Urban Storm Water Mitigation Plan For Los Angeles County and Cities In Los Angeles County*, March 8, 2000.

### County of Los Angeles Integrated Waste Management Plan

The County of Los Angeles Integrated Waste Management Plan<sup>43</sup> (ColWMP), approved by the CIWMB in June 1999, is a set of planning documents that sets forth a regional approach for the management of solid waste through source reduction, recycling and composting, and environmentally safe transformation and disposal. The ColWMP recognizes that landfills will remain an integral part of the County's solid waste management system in the foreseeable future and ensures that the waste management practices of cities and other jurisdictions in the County are consistent with the solid waste diversion goals of AB 939. The ColWMP includes approaches such as source reduction, recycling and composting programs, household hazardous waste management programs, and public education awareness programs. The plan concludes that landfill disposal will remain an integral part of the waste management system and calls for the establishment of 50 years of in-County permitted landfill capacity, as well as the County's support for the development of disposal facilities out of the County.

The County continually evaluates landfill needs and capacity through the preparation of the ColWMP annual reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed, in part, by determining the available landfill capacity. Landfill capacity is determined by several factors, including: (1) the expiration of various landfill permits (e.g., land use permits, waste discharge requirements permits, solid waste facilities permits, and air quality permits); (2) restrictions to accept waste generated only within a landfill's particular jurisdiction and/or watershed boundary; and (3) operational constraints. The most recent annual report is the 2019 report, completed in September 2020.

As part of the ColWMP, the County prepared the Countywide Siting Element, which identifies goals, policies, and strategies for the proper planning and siting of solid waste disposal and transformation facilities for the next 15 years. The Siting Element was approved by CalRecycle in June 1998. The County is currently updating the Siting Element to reflect remaining landfill disposal capacities and the County's current strategy for maintaining adequate disposal capacities. The Los Angeles County Department of Public Works is currently revising the Siting Element.<sup>44</sup>

<sup>43</sup> Los Angeles County Public Works, *County of Los Angeles Countywide Integrated Waste Management Plan*, accessed September 2021, <https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF>.

<sup>44</sup> Los Angeles County Public Works, "Countywide Siting Element," accessed September 2021, <https://dpw.lacounty.gov/epd/cse/AboutUs/>.

#### 4.14.3.4 Local Regulations and Directives

##### City of Inglewood General Plan

The City General Plan Conservation Element contains several policies related to water production and wastewater that can assist in the maintenance of water standards and the efficient utilization of water as a scarce resource. These policies fall under the following three categories:<sup>45</sup>

- Protect aquifers and water sources by preventing contamination of ground water from surface contaminants and treating ground water pumped from City wells to ensure the water meets safe drinking water standards.
- Reduce the ever-increasing demand being placed on the aquifers and on the Statewide water sources through cumulative conservation efforts, reuse of water, and using reclaimed water where potable water is not needed (namely, irrigation and landscaping).
- Maintain a water quality monitoring system to ensure continues compliance with State standards.

Further, the General Plan Conservation Element includes the following policies related to stormwater relevant to the proposed Project:

- Visit businesses to educate owners about stormwater regulations and the penalties for illegally dumping into storm drains.
- Require periodic sweeping to remove oil, grease, and debris from parking lots of 25 spaces or more.
- Increase the frequency of sampling storm drain pollution by County agencies to assess which measures are more successful.
- Continue to stencil warnings over individual storm drain openings that advise against discarding litter into the drains.

Additionally, the General Plan Conservation Element discusses ways to achieve solid waste conservation. This includes conserving remaining landfill capacity and reducing the generation of waste materials through measures such as charging for refuse pickup by weight for commercial and industrial businesses and residences, instituting commercial and residential curbside recycling pickup services, linking waste generators with commercial recyclers, and educating the public about the benefits of composting.<sup>46</sup>

<sup>45</sup> City of Inglewood General Plan, "Conservation Element" (1997).

<sup>46</sup> City of Inglewood General Plan, "Conservation Element" (1997).

##### Inglewood Municipal Code

City of Inglewood Municipal Code (IMC) Stormwater Management and Discharge Control, Section 10-208, Low Impact Development Requirements for New Development and Redevelopment<sup>47</sup> provides for the use of LID requirements and additional revisions pursuant to the NPDES permit requirements for the municipal separate sewer system. Among the provisions of the LID ordinance are requirements for existing properties, industrial/commercial and construction activities to prevent runoff and the maintenance of a *Low-Impact Development (LID) Standards Manual* (LID Manual)<sup>48</sup> for development and redevelopment activities within the City. Appropriate erosion-control BMPs may include but are not limited to silt fencing, fiber rolls, sandbag barriers, gravel bag berms, stabilized construction site entrances/exits, and any other practices laid out in the City's LID Manual.

In regard to wastewater, IMC Section 10-89,<sup>49</sup> Determination of Capacity, states that the size and grade of each public sewer must be such as to provide at all times sufficient capacity for peak flow rates of discharge. The Public Works Director shall determine what capacity is necessary in each public sewer to provide for the proper collection of sewage in the City. In the event a lot in the City is to undergo development or redevelopment, and the anticipated sewage from the proposed use is found by the Public Works Director to exceed the capacity available in the public sewer, the building permit for such development or redevelopment shall not be issued until such time as capacity in the public sewer is available or can be made available before the building is occupied.

IMC Section 10-89,<sup>50</sup> Determination of Capacity, establishes a basis for computing average daily flow to the sanitary sewer. All other land uses not included are classified by the occupancy it most nearly resembles as determined by the Public Works Director or computed by him or her in accordance with the anticipated use. The daily flow to the sanitary sewer for a building containing mixed occupancies is determined by adding the peak flow characteristics of the various occupancies as set forth in the above table. The daily flow from a room or building which is used for different occupancies at different times as determined by the occupancy which gives the largest peak flow.

City Ordinance No. 18-10<sup>51</sup> established a Construction and Demolition Recycling Program (CDRP) which requires applicants to divert a minimum of 65 percent, or the State-mandated diversion percentage, whichever is greater, of the Construction and Demolition Debris from all covered projects as defined in IMC Section 7-63, 100 percent of land clearing debris from nonresidential newly constructed buildings,

<sup>47</sup> City of Inglewood, IMC, Ordinance No. 15-14 revised Article 16 of "Chapter 10, Stormwater Management and Discharge Control," Section 10-208, Low Impact Development Requirements for New Development and Redevelopment.

<sup>48</sup> Inglewood, California, *Municipal Code*, "Chapter 10, Article 16, Stormwater Management and Discharge Control," Section 10-208, Low Impact Development Requirements for New Development and Redevelopment.

<sup>49</sup> Inglewood, California, *Municipal Code*, "Chapter 10, Article 7, Sewer Connect, Section 10-89. Determination of Capacity."

<sup>50</sup> Inglewood, California, *Municipal Code*, "Chapter 10, Article 7, Sewer Connect, Section 10-89. Determination of Capacity."

<sup>51</sup> Inglewood, California, *Municipal Code*, "Chapter 7, Article 7, Construction and Demolition Recycling Program (CDRP)."

and all universal waste from nonresidential and alteration projects, in compliance with State and local statutory goals and policies and to create a mechanism to secure compliance with the stated diversion requirement.

### **City of Inglewood Urban Water Management Plan**

In compliance with the Urban Water Management Planning Act<sup>52</sup> (Water Code Section 10610-10610.4), the City most recently adopted the 2020 Urban Water Management Plan (UWMP) which serves as a master plan for water supply and resources management consistent with the City's goals and objectives.<sup>53</sup> The UWMP provides a framework for long term water planning and informs the public of the suppliers' plans to ensure adequate water supplies for existing and future demands. The UWMP projects sufficient supply to meet all reliability requirements.

#### **4.14.4 EXISTING CONDITIONS**

The existing utility and service system infrastructure networks are described herein pertaining to water supply and demand, wastewater, stormwater, and solid waste. Current demands placed on these systems and their respective carrying capacities are identified. In addition, existing conditions relative to specific utility locations in the area.

##### **4.14.4.1 City of Inglewood**

#### **Water Supply and Demand**

##### **City of Inglewood Water Supply Overview**

The City's potable water system includes 156 miles of pipe varying in diameter from 2 to 42 inches, four groundwater wells, two booster pump stations, a groundwater treatment plant, two reservoirs, two imported water connections to Metropolitan, and a total of eight emergency interties with the Los Angeles DWP and the Golden State Water Company (GSWC).<sup>54</sup>

The City provides water to 86 percent of the residences and businesses in the City. Water is provided in the remaining areas by Golden State Water Company and Cal America Water.<sup>55</sup> The water provided by the City is pumped from City-owned wells, treated, and blended with water purchased from the WBMWD through MWD pipe connections. The City also purchases recycled water from WBMWD which is used for irrigation and landscaping purposes at City parks, cemeteries, and schools. Recently, the City

<sup>52</sup> Urban Water Management Planning Act, Water Code Section 10610-10610.4.

<sup>53</sup> City of Inglewood, *2020 Urban Water Management Plan*, July 2021.

<sup>54</sup> City of Inglewood, *2020 Urban Water Management Plan*, July 2021.

<sup>55</sup> City of Inglewood. Water Works. <https://www.cityofinglewood.org/463/Water-Works>.

Council approved the use of recycled water for street sweeping and sewer flushing purposes. The City purchases approximately 700 acre-feet per year (AFY) of recycled water on average per year.

The City has two reservoirs: North Inglewood and Morningside. The North Inglewood Reservoir was constructed in 1974 and has a total capacity of 4.6 million gallons; the North Inglewood Reservoir is a covered, underground concrete water storage reservoir with an associated pump station containing four pumps. The Morningside Reservoir, currently out of service due to structural issues, was constructed in 1954 and has a total capacity of 16 million gallons. This facility is an above-ground, concrete water storage reservoir with an associated pump station containing ten pumps.

The Sanford M. Anderson Treatment Plant (Anderson Treatment Plant), located in northern Inglewood, processes raw groundwater pumped from the City's wells for the removal of iron and manganese<sup>56</sup> and monitors water for 103 federally-regulated possible contaminants.<sup>57</sup> The Anderson Treatment Plant has a treatment capacity of 8.64 million gallons per day (mgd) and storage capacity of 500,000 gallons. Treated groundwater leaving the Anderson Treatment Plant is pumped into one of the two storage reservoirs, when active. While in route to the reservoirs, treated water supply from the MWD enters through the two imported water connections and blends with the treated groundwater leaving the Anderson Treatment Plant. Water is then distributed from the City reservoirs to users.

In 2020, 67 percent of the City's potable water supply—5,972 acre-feet (af)—came from imported water purchased from MWD through its regional water supplier and the WBMWD. The remaining 33 percent of the City's potable water supply came from groundwater pumping from the West Coast Groundwater Basin (Basin) and the purchase of recycled water from the WBMWD for nonpotable uses (2,312 af and 806 af, respectively). Recycle water is distributed to 35 recycled water users within the City, constituting approximately 9 percent of its total water supply.

The amount of water the City is permitted to pump from the Basin is limited by a 1961 Order of the Los Angeles Superior Court (adjudication) to 4,450 AFY. Generally, the City is entitled to pump up to its maximum allowable extraction right along with any carryover or unused water rights from the previous years and any net leases or exchanges of water rights per agreements with other parties owning those rights.<sup>58</sup>

In 2020, the City pumped 3,062 AFY of water from the Basin, which left 1,388 AFY (32 percent) of the City's water pumping rights unused. With well rehabilitation and new construction, City groundwater production capacity is forecast to maintain approximately 2,200 AFY through 2045. The City will rehabilitate and

<sup>56</sup> City of Inglewood, *2020 Urban Water Management Plan*, July 2021.

<sup>57</sup> City of Inglewood, "Water Works," accessed September 2021, <https://www.cityofinglewood.org/463/Water-Works>.

<sup>58</sup> City of Inglewood, *2020 Urban Water Management Plan*, July 2021.

replace wells as required to maintain average annual well supply at approximately 4,450 AFY.<sup>59</sup> Due to the Basin adjudication, groundwater supplies are actively managed pursuant to regulations that prevent the occurrence of overdraft conditions. Under multiple dry year conditions, imported supplies can be purchased to meet an annual increase in demand.

The City's UWMP provides projections for water supply and demand for years 2025 through 2045. In 2025, for multiple dry water year (5-year) conditions it is estimated that the City would have a total water supply (including recycled water) of 12,000 AFY and a total demand of 11,510 AFY. Furthermore, it is forecasted that the WBMWD would have a water surplus for all years through 2045 during normal year, single dry year, and multiple dry year conditions. The City's projected water supplies and demands in multiple dry years are shown in **Table 4.14-1: Projected Water Supply and Demand in Multiple Dry Years**. Given WBMWD's determination that it can meet all full-service demands of its member agencies through 2045 with surplus supplies, and the City's goal to regularly upgrade and rehabilitate its well supply system to maintain groundwater supply equivalent to its groundwater rights of 4,500 AFY, it is projected the City can meet all normal year, single dry year, and multiple dry year demands through the year 2045.<sup>60</sup>

**Table 4.14-1**  
**Projected Water Supply and Demand in Multiple Dry Years**

	2025	2030	2035	2040	2045
	afy				
Total Supply	12,000	12,000	12,000	12,000	12,000
Total Demand	11,510	11,593	11,702	11,831	11,975
Difference	490	407	298	169	25

Source: City of Inglewood 2020 UWMP.

**Existing Water Consumption**

The proposed Project is located within a heavily developed area of the City which utilizes water supplies for a variety of land uses. Moreover, there are several existing developments which contribute to existing water demand that would be removed and demolished as part of the proposed Project. Specifically, development of the Market Street/Florence Avenue Station would remove a variety of commercial, restaurant, and retail uses. Additionally, development of the MSF site would result in the reconstruction of a grocery store and removal of a gas station. The proposed Project would require a number of full and partial property acquisitions and easements or leases for construction and operation of the guideway, stations, MSF, and other support facilities included in the proposed Project. These existing uses currently

<sup>59</sup> City of Inglewood, 2020 Urban Water Management Plan, July 2021.  
<sup>60</sup> City of Inglewood, 2020 Urban Water Management Plan, July 2021.

generate water demand for building operation as well as landscaping irrigation. These uses total approximately 303,023 SF of operational space.

In the absence of any standard water usage factors, water consumption estimates were developed for long-term existing operational use based on land use wastewater generation factors developed by the Los Angeles County Sanitation District (LACSD), with 20 percent added to account for evaporation and absorption losses. As shown in **Table 4.14-2: Water Demand from Existing Uses to be Removed**, notes that currently existing uses to be removed consume approximately 77,862 gallons of water per day (gpd) or 0.08 million gallons per day (mgd); this is equivalent to 87.2 AFY. It should be noted that prior to construction of the proposed Project, a new Vons store would be developed to replace the existing store located on the site for the proposed MSF, which would have a demand of approximately 8,352 gpd (9.36 afy) of water.

**Wastewater**

The City served a population of approximately 118,000 in 2008.<sup>61</sup> The City's Public Works Department manages the City's sanitary sewer collection system. The sewer collection system consists of about 145 miles of gravity sewer pipe ranging in size from 4 to 16 inches in diameter and approximately 3,100 manholes. The sewers are primarily constructed of vitrified clay pipe with approximately 95 percent of the pipes sized at 8-inch in diameter. The majority of the existing sewer system was constructed before 1960. Due to the general age of the sewer system, the City is implementing a proactive sewer rehabilitation program that prioritizes and replaces sewer lines that have been identified as deficient, through its sewer inspection program. The City inspected 91 miles of sewer lines (62 percent of the system) in 2008 and is initiating a new inspection program for the remaining portion of the sewer system so that needed rehabilitation of sewer lines can be identified. In addition, the City performs video inspection of its entire sewer system every 5 years.

Wastewater flow via gravity and is generally from north to south and east to west. The majority of sewers tie directly into one of the LACSD trunk sewers crossing through the City, which are located primarily in larger streets and convey sewage to LACSD sewage treatment plants. There are approximately 203 connections to the LACSD, which convey the City's wastewater out of the City to the south and continue to flow by gravity to the LACSD Joint Water Pollution Control Plant located in the City of Carson for treatment and disposal.<sup>62</sup> The JWPCP facility processes both primary and secondary treatment for an average flow of 256.8 MGD with a design capacity of 400 MGD. Prior to discharge, the treated wastewater is disinfected with sodium hypochlorite and sent to the Pacific Ocean through a network of outfalls. These

<sup>61</sup> City of Inglewood, 2015 Sewer System Management Plan, August 31, 2015.  
<sup>62</sup> City of Inglewood, 2015 Sewer System Management Plan, August 31, 2015.

outfalls extend 1½ miles off the coast of Southern California into the Palos Verdes Peninsula to a depth of 200 feet.<sup>63</sup>

**Table 4.14-2**  
**Water Demand from Existing Uses to be Removed**

Property Address	Use Type	Quantity	Demand Factor (GPD/1,000 SF) <sup>a</sup>	Daily Demand (gpd)	Daily Demand (mgd)	Annual Demand (afy)
310 E. Florence Ave	Restaurant	1,200 SF	1,200	1,400.0	0.001	1.61
300 E. Florence Ave	Restaurant	4,762 SF	1,200	5,714.4	0.006	6.40
254 N. Market St	Restaurant	4,608 SF	1,200	5,529.6	0.006	6.19
250 N. Market St	Auto Service	44,000 SF	120	5,280.0	0.005	5.91
240 N. Market St	Shopping Center	12,300 SF	390	4,797.0	0.005	5.37
230 N. Market St	Store	22,194 SF	120	2,663.3	0.003	2.98
224 N. Market St	Store	5,000 SF	120	600.0	0.001	0.67
222 N. Market St	Shopping Center	25,500 SF	390	9,945.0	0.010	11.14
210 N. Market St	Shopping Center	7,348 SF	390	2,865.7	0.003	3.21
150 S. Market St	Store	16,575 SF	120	1,989.0	0.002	2.23
500 E. Manchester Blvd	Supermarket <sup>b</sup>	76,402 SF	180	13,752.4	0.014	15.40
510 E. Manchester Blvd	Gas Station	202 SF	120	24.2	<0.001	0.03
401 South Prairie Avenue	Office	28,029 SF	240	6,727	0.007	7.54
	Store	9,744 SF	120	1,169.3	0.001	1.31
923 South Prairie Ave	Office	8,357 SF	240	2,005.7	0.002	2.25
945 South Prairie Ave	Office	5,522 SF	240	1,325.3	0.001	1.48
1003 South Prairie Ave	Office	1,098 SF	240	263.52	<0.001	0.30
1011 South Prairie Ave	Shopping Center	30,182 SF	390	11,771.0	0.012	13.19
<b>Total</b>	<b>—</b>	<b>303,023 SF</b>	<b>—</b>	<b>77,862.3</b>	<b>0.078</b>	<b>87.22</b>

Note: SF = square feet; gpd = gallons per day; mgd = million gallons per day; afy = acre-feet per year  
 Source: LACSD, Will Serve Program, accessed September 2021, <https://www.lacsd.org/services/wastewater-programs-permits/will-serve-program>.  
<sup>a</sup> All water consumption factors are wastewater generation factors provided by LACSD, with 20 percent added to account for evaporation and absorption losses.  
<sup>b</sup> Prior to construction of the proposed Project, a 46,400 square-foot replacement Vons store would be developed which would have a demand of approximately 8,352 gpd (9.36 afy) of water.

63 City of Inglewood, Final Environmental Impact Report for the Transit Oriented Development Plan for Downtown Inglewood and Fairview Heights, September 2016. Prepared by Metis Environmental Group.

**Existing Wastewater Generation**

There are several existing developments which contribute to existing wastewater generation that would be demolished as previously noted. Wastewater generation estimates were developed for long-term existing operational use by LACSD. **Table 4.14-3: Wastewater Generation from Existing Uses to be Removed** notes that currently existing uses within the footprint of the proposed Project that will be removed generate approximately 65,885 gpd or 0.07 mgd (72.7 afy) of wastewater.

**Table 4.14-3**  
**Wastewater Generation from Existing Uses to be Removed**

Property Address	Use Type	Quantity	Generation Factor (GPD/1,000 SF)	Daily Generation (gpd)	Daily Generation (mgd)	Annual Generation (afy)
310 E. Florence Ave	Restaurant	1,200 SF	1,000	1,200.0	0.001	1.34
300 E. Florence Ave	Restaurant	4,762 SF	1,000	4,762.0	0.005	5.33
254 N. Market St	Restaurant	4,608 SF	1,000	4,608.0	0.005	5.16
250 N. Market St	Auto Service	44,000 SF	100	4,400.0	0.004	4.93
240 N. Market St	Shopping Center	12,300 SF	325	3,997.5	0.004	4.48
230 N. Market St	Store	22,194 SF	100	2,219.4	0.002	2.49
224 N. Market St	Store	5,000 SF	100	500.0	0.001	0.56
222 N. Market St	Shopping Center	25,500 SF	325	8,287.5	0.008	9.28
210 N. Market St	Shopping Center	7,348 SF	325	2,388.1	0.002	2.68
150 S. Market St	Store	16,575 SF	100	1,657.5	0.002	1.86
500 E. Manchester Blvd	Supermarket <sup>a</sup>	76,402 SF	150	11,460.3	0.011	12.84
	Gas Station	202 SF	100	20.2	<0.001	0.02
510 E. Manchester Blvd	Office	28,029 SF	200	5,605.8	0.006	6.28
401 South Prairie Ave	Store	9,744 SF	100	974.4	0.001	1.09
945 South Prairie Ave	Office	8,357 SF	200	1,671.4	0.002	1.87
1003 South Prairie Ave	Office	5,522 SF	200	1,104.4	0.001	1.24
1011 South Prairie Ave	Office	1,098 SF	200	219.60	<0.001	0.25
1035 South Prairie Ave	Shopping Center	30,182 SF	325	9,809.2	0.010	10.99
<b>Total</b>	<b>—</b>	<b>303,023 SF</b>	<b>—</b>	<b>64,885.3</b>	<b>0.065</b>	<b>72.68</b>

Note: SF = square feet; gpd = gallons per day; mgd = million gallons per day; afy = acre-feet per year  
 Source: LACSD, Will Serve Program, accessed September 2021, <https://www.lacsd.org/services/wastewater-programs-permits/will-serve-program>.  
<sup>a</sup> Prior to construction of the proposed Project, a 46,400 square-foot replacement Vons store would be developed which would generate approximately 6,960 gpd (7.80 afy) of wastewater.

It should be noted that prior to construction of the proposed Project, a replacement Vons store would be developed which would generate approximately 6,960 gpd (7.80 afy) of wastewater.

### **Stormwater**

The main storm drain lines within the area of the proposed Project are owned and maintained by the Los Angeles County Flood Control District (LACFCD) and the City. The City owns and maintains approximately 12 miles of drainage pipelines and 464 catch basins; and the LACFCD has approximately 42 miles of storm drain pipelines and 889 catch basins within the City.<sup>64</sup>

The proposed Project is located within two watersheds in the southern California Coastal Subregion. The portion located north of Market Street is located approximately 1.3 miles (as the crow flies) from the headwaters of Centinela Creek, in the Ballona Creek Watershed. Centinela Creek flows to Ballona Creek Reach 2, which eventually flows to the Santa Monica Bay. The remaining portions along Manchester Boulevard and Prairie Avenue are located approximately 1.3 miles upstream of the headwaters of the upper Dominguez Channel watershed. The Dominguez Channel eventually drains south toward Alamitos and ultimately the Los Angeles Harbor.

There are existing storm drain inlets and storm drains along the proposed Project. The drains would convey stormwater runoff downstream, and ultimately, to the respective water bodies. The stormwater drainage system drains into the various tributaries of each watershed discussed above. Typically, these areas are predominately channelized and highly developed with both commercial and residential properties. Most of the drainage networks are controlled by structural flood control measures, including debris basins, storm drains, underground culverts, and open concrete channels.

### **Electrical Power**

As further discussed in **Section 4.5: Energy**, electricity within the City is supplied by Southern California Edison (SCE), which serves approximately 15 million people in a 50,000-square-mile service area.<sup>65</sup> Electricity within the area of the proposed Project is primarily used for lighting, cooling, and operation of businesses and restaurants. Electricity is also used indirectly in the delivery, treatment, and distribution of water used within the Project boundary, as well as for the treatment of wastewater. There are several electrical lines documented along the proposed Project as further discussed below.

64 City of Inglewood, *Final Environmental Impact Report for the Transit Oriented Development Plan for Downtown Inglewood and Fairview Heights*, September 2016. Prepared by Metis Environmental Group.

65 Southern California Edison, "Newsroom Fact Sheet," April 29, 2019, accessed September 2021, [https://newsroom.edison.com/internal\\_redirect/cms.ipressroom.com.s3.amazonaws.com/166/files/20193/SCE%20Service%20Area%20Fact%20Sheet\\_Ver2\\_04252019.pdf](https://newsroom.edison.com/internal_redirect/cms.ipressroom.com.s3.amazonaws.com/166/files/20193/SCE%20Service%20Area%20Fact%20Sheet_Ver2_04252019.pdf).

### **Natural Gas**

As further discussed in **Section 4.5**, Southern California Gas Company (SoCalGas) is the natural gas purveyor within the City. The SoCalGas service area reaches 21.8 million consumers through 5.9 million meters in more than 500 communities, covering an area of approximately 24,000 square miles throughout Central and Southern California.<sup>66</sup> Natural gas is primarily used within the Project boundary for space heating, food preparation, and maintenance activities. There are several natural gas lines documented along the proposed Project as further discussed below.

### **Telecommunications**

The Telecommunications Division of the Information Technology and Communications Department is responsible for all of the voice-related services for the City of Inglewood. There are 22 locations, both large and small which require service from the Telecommunications staff. Moreover, the Telecommunications Division has over 1,100 phones, 850 voice mailboxes, and many incoming and outgoing lines, which provide service to the citizens of Inglewood.<sup>67</sup> Additionally, Spectrum Business is the primary cable provider in the area and may provide telecommunication services to the proposed Project. Telecommunications cable lines along the proposed Project would be installed in the same utility trenches as undergrounded electrical service.

### **Solid Waste**

#### **City of Inglewood Solid Waste Generation and Collection**

The City's Department of Public Works is responsible for developing plans and strategies to manage solid waste disposal and recycling for the City. Solid waste is collected curbside from properties within the City by Consolidated Waste Services (CDS), a private waste handler, and processed at CDS's American Waste Transfer Station in the City of Gardena, where it is sorted; residual garbage is taken to the Consolidated Volume Transport Disposal and Recycling Center (CVT) in the City of Anaheim; and recycling and green waste is taken to CDS's Compton Transfer Station in the City of Compton.<sup>68</sup>

There are three types of disposal facilities for nonhazardous waste within Los Angeles County: Class III Landfills (Municipal Solid Waste Landfills); Unclassified (Inert) Landfills; and Transformation (waste to energy) Facilities. A Class III Landfill accepts nonhazardous household waste. Unclassified Landfills accept materials such as soil, concrete, asphalt, and other construction and demolition debris. Transformation

66 Southern California Gas Company, "Company Profile," Accessed September 2021, <https://www.socalgas.com/about-us/company-profile>.

67 City of Inglewood, "Telecommunications," accessed September 2021, <https://www.cityofinglewood.org/327/Telecommunications>.

68 City of Inglewood, "Waste Collection FAQs," accessed September 2021, <https://www.cityofinglewood.org/FAQ.aspx?TID=30>.

Facilities involve the incineration, pyrolysis, destructive distillation, gasification, or the chemical or biological processing of municipal solid waste in order to generate energy, reduce volume, or produce synthetic fuel. Materials Recovery Facilities are available to recover recyclable materials from waste to provide for the efficient transfer of the residual waste to permitted landfills for proper disposal. Hazardous waste cannot be disposed of at Class III or Unclassified Landfills. The California Hazardous Waste Control Law requires that these hazardous materials be transported and disposed of or treated at a licensed facility.

#### Regional Landfill Capacity

The County of Los Angeles (County) is responsible for regional landfill services. The County of Los Angeles provides regional planning for landfill services. In response to the 1989 California Integrated Waste Management Act, the County prepared and administers a ColWMP.

The County continually evaluates landfill disposal needs and capacity through preparation of ColWMP annual reports. Within each annual report, future landfill disposal needs over the ensuing 15-year planning horizon are addressed, in part by determining the available landfill capacity.<sup>69</sup> As discussed in the ColWMP, while the economy has shown signs of improvement in recent years, the amount of waste that residents and businesses have generated and disposed of in the County continues to remain relatively low.

In 2019, the County disposed of approximately 11 million tons of materials.<sup>70</sup> The County estimates that this disposal amount represents the generation of approximately 30.1 million tons with a 65 percent diversion rate. Of that amount, the majority was accommodated by in-County Class III landfills (5.20 million tons), followed by exports to out-of-County landfills (5.0 million tons), and transformation facilities (0.34 million tons). The 2019 County average daily disposal rate was 17,145 tons per day, and the maximum daily capacity was 35,159 tons per day. The remaining disposal capacity for the County's Class III landfills is estimated at approximately 148.40 million tons as of December 31, 2019. The County estimates that in 2034 cumulative demand for disposal will be approximately 178.6 million tons.

Of the various landfills serving the City of Los Angeles, Sunshine Canyon Landfill is the largest recipient of nonhazardous solid waste disposal materials (i.e., Class III waste materials). This landfill had a remaining capacity of 55.2 million tons in 2019, with an expected life expectancy of 18 years. The maximum daily capacity for the landfill is 12,100 tons per day and the 2019 disposal rate was 6,387 tons per day.<sup>71</sup> In 2019, the annual amount of inert waste materials, such as earth, landscaping, concrete and asphalt,

<sup>69</sup> Los Angeles County Department of Public Works, *Los Angeles County Integrated Waste Management Plan, 2019 Annual Report*, September 2020.

<sup>70</sup> Los Angeles County Department of Public Works, *Los Angeles County Integrated Waste Management Plan, 2019 Annual Report*, September 2020.

<sup>71</sup> Los Angeles County Department of Public Works, *Los Angeles County Integrated Waste Management Plan, 2019 Annual Report*, September 2020.

disposed of within the County was 0.267 million tons. The Azusa Land Reclamation is the primary Inert Waste Landfill serving the County. The remaining capacity of this landfill is estimated at 58.84 million tons. Given the remaining permitted capacity and the 2019 average disposal rate of 1,038 tons per day, this capacity would be exhausted in approximately 26 years.

In addition to the County-permitted facility, there are a number of inert debris engineered fill operation facilities operating under State permit provisions that provide additional capacity in the County, processing approximately 3.35 million tons in 2019.<sup>72</sup> Countywide waste reduction and diversion programs have reduced disposal levels at the County's landfills. The County is updating its ColWMP, including annual reports and a master plan for meeting waste disposal needs for a 15-year planning period.

The most recent Annual Report indicates that the County can adequately meet future Class III disposal needs through 2034 through scenarios that include a combination of all or some of the following: (1) utilizing the permitted in-county disposal capacity only, (2) keeping to the status quo (3) meeting CalRecycle's Statewide Disposal Target of 2.7 PPD (Pounds per Person per Day); (4) meeting Senate Bill 1383 Organic Waste Disposal Targets; (5) utilization of additional alternative technology capacity; (6) increase in exports to out-of-County landfills; and (7) all solid waste management options considered become available.<sup>73</sup>

**Table 4.14-4: County of Los Angeles Annual Disposal Tonnage for 2019** provides a list of solid waste facilities, including transfer stations, compost facilities, and disposal sites and indicates that approximately 10,969,522 tons of solid waste was disposed of in these facilities.

**Table 4.14-5: In-County Class III Landfills Servicing the City of Inglewood** shows four landfills located in the County which could serve the proposed Project. As of 2019, the four landfills had a combined estimated remaining capacity of approximately 134.16 million tons. Waste that is currently generated in the area is disposed of at the Sunshine Canyon landfill. As described in the County's most recent landfill disposal capacity report, a shortfall in permitted solid waste disposal capacity within the County is not anticipated to occur under forecasted growth and ongoing municipal efforts at waste reduction and diversion within the next 15 years.<sup>74</sup>

<sup>72</sup> Los Angeles County Department of Public Works, *Los Angeles County Integrated Waste Management Plan, 2019 Annual Report*, September 2020.

<sup>73</sup> Los Angeles County Department of Public Works, *Los Angeles County Integrated Waste Management Plan, 2019 Annual Report*, September 2020.

<sup>74</sup> Los Angeles County Department of Public Works, *Los Angeles County Integrated Waste Management Plan, 2018 Annual Report*, September 2020.

Table 4.14-4

## County of Los Angeles Annual Disposal Tonnage for 2019

Landfill Type	Amount (tons)
In-County Class III Landfills	5,349,231
Transformation Facilities	384,097
Exports to Out-of-County Landfills	4,969,741
<i>Subtotal Solid Waste Exposed:</i>	<i>10,703,070</i>
Permitted Inert Waste Landfill	266,452
<b>Solid Waste Disposed Grand Total</b>	<b>10,969,522</b>

Source: Los Angeles County Department of Public Works, Los Angeles County Integrated Waste Management Plan, 2019 Annual Report, September 2020.

Table 4.14-5

## In-County Class III Landfills Servicing the City of Inglewood

Landfill	Maximum Daily Capacity (tons)	2019 Average Daily Disposal (tons)	Total Disposal Yearly Equivalent (million tons)	2019 Remaining Permitted Capacity (million tons)
Antelope Valley Landfills I and II	3,600	2,113	1.13	12.00
Chiquita Canyon Landfill	12,000	5,525	3.12	57.00
Lancaster Landfill	3,000	363	0.94	10.00
Sunshine Canyon City/County Landfill	12,100	6,387	3.78	55.16

\*Calculated or assumed quantities based on proposed expansion.

Source: Los Angeles County Department of Public Works, Los Angeles County Integrated Waste Management Plan, 2019 Annual Report, September 2020.

## Existing Solid Waste Generation

The proposed Project is located within a heavily developed area of the City which generates solid waste from a variety of land uses. As previously noted, there are several existing developments which generate solid waste that would be demolished and removed.

As shown in **Table 4.14-6: Existing Solid Waste Generation from Existing Uses to be Removed**, the existing uses to be removed currently generate approximately 5,460.4 pounds (2.7 tons) of solid waste per day, and approximately 996.5 tons of solid waste per year. It should be noted that prior to construction of the

proposed Project, a replacement Vons store would be developed which would generate approximately 1,448 pounds (0.7 tons) of solid waste per day and 264 tons of solid waste per year.

Table 4.14-6

## Existing Solid Waste Generation from Existing Uses to be Removed

Property Address	Use Type	Quantity	Generation Factor (lb./100 SF/day)	Daily Generation (lbs./day)	Daily Generation (tons/day)	Annual Generation (tons/year)
310 E. Florence Ave	Restaurant	1,200 SF	0.5	6.0	0.003	1.10
300 E. Florence Ave	Restaurant	4,762 SF	0.5	23.8	0.012	4.35
254 N. Market St	Restaurant	4,608 SF	0.5	23.0	0.012	4.20
250 N. Market St	Auto Service	44,000 SF	0.9	396.0	0.198	72.27
240 N. Market St	Shopping Center	12,300 SF	2.5	307.5	0.154	56.12
230 N. Market St	Store	22,194 SF	3.12	692.5	0.346	126.37
224 N. Market St	Store	5,000 SF	3.12	156.0	0.078	28.47
222 N. Market St	Shopping Center	25,500 SF	2.5	637.5	0.319	116.34
210 N. Market St	Shopping Center	7,348 SF	2.5	183.7	0.092	33.53
150 S. Market St	Store	16,575 SF	3.12	517.1	0.259	94.38
500 E. Manchester Blvd	Supermarket <sup>a</sup>	76,402 SF	3.12	2,383.7	1.192	435.03
510 E. Manchester Blvd	Gas Station	202 SF	0.9	1.8	0.001	0.33
401 South Prairie Ave	Office	28,029 SF	0.6	17.0	0.008	3.07
923 Prairie Ave	Store	9,744 SF	3.12	30.40	0.015	5.55
945 Prairie Ave	Office	8,357 SF	0.6	5.01	0.003	0.92
1003 South Prairie Ave	Office	5,522 SF	0.6	3.31	0.002	0.60
1011 South Prairie Ave	Office	1,098 SF	0.6	0.66	<0.001	0.12
1035 South Prairie Ave	Shopping Center	30,182 SF	2.5	75.46	0.038	13.77
<b>Total</b>		<b>303,023 SF</b>	<b>—</b>	<b>5,460.4</b>	<b>2.730</b>	<b>996.52</b>

Notes: SF = square feet; lb. = pounds.

Source: CalRecycle, Estimated Solid Waste Generation Rates, accessed September 2021, <https://www2.calrecycle.ca.gov/wastecharacterization/general/rates>.

<sup>a</sup> Prior to construction of the proposed Project, a 46,400 square-foot replacement Vons store would be developed which would generate approximately 1,448 lbs (0.7 tons) per day and 264 tons per year of solid waste.

## 4.14.4.2 Project Area

The proposed Project would begin at the Market Street/Florence Avenue Station, largely situated in the public right-of-way in between Florence Avenue and Regent Street and would extend south along Market Street. At Market Street's intersection with Manchester Boulevard, the guideway would shift onto Manchester Boulevard and proceed east. At Manchester Boulevard's intersection with Prairie Avenue, the guideway then shifts onto Prairie Avenue and proceeds south until its intersection with Hardy Street. A

number of utility lines follow and transect the roadways in the area due to their status as major rights-of-way.

As discussed in 4.14.2: *Methodology* above, the following is a discussion of utilities known to be located within the rights-of-way of streets in the area and their approximate location. Since this represents the best available information at the time of analysis, there may be additional utility lines within the area, or specific locations of identified utility lines may slightly differ. As mentioned previously, exact utility locations would be determined prior to construction by potholing, utilizing ground penetrating radar, and/or other methods. Discussions related to water, wastewater, stormwater, electrical, and gas lines and infrastructure are included below.

### **Water, Wastewater, and Stormwater Infrastructure**

#### **Market Street Segment**

The Market Street segment starts from the intersection with the Metro K Line north of downtown Inglewood, southwest for approximately a quarter of a mile to the intersection of Market Street and Regent Street, continuing south on Market Street until Manchester Boulevard.

Within this portion of the alignment, water and wastewater lines ranging from 4 to 24 inches in diameter are located in the streets and alleys following and traversing the alignment. The existing water lines are generally older pipelines made of asbestos cement; however, some pipelines consist of cast iron, polyvinyl chloride (PVC), reinforced concrete cylinder, or galvanized steel. Additionally, a number of storm drains fed by on-street storm drain inlets are located within this segment.

#### **Water Lines**

As shown in **Table 4.14-7: Existing Water and Sewer Utilities**, several different water lines exist within the right-of-way of the Market Street segment. These include:

- A 24-inch east–west water distribution line follows Florence Avenue and transitions to an 8-inch water line at the Florence Avenue and Market Street intersection, proceeding south along the western side of Market Street. The line then transitions to the eastern side of Market Street approximately 75 feet south of the Florence Avenue and Market Street intersection and continues south, within approximately 25 feet of the eastern curb face.
- An 8-inch water line, 6-inch recycled water line, and storm drain run east–west along the northern side of Regent Street and all transect Market Street at the intersection of those streets; the north–south traveling water line ties into the 8-inch east–west water line at this point.
- An additional 24-inch east–west water line runs along the southern side of Regent Street through the Market Street intersection.

- A 12-inch water line continues out of the 8-inch east–west line and proceeds south along Market Street from Regent Street to Queen Street, transitioning from the eastern side of Market Street to the western side within 12 feet of the curb and approximately 100 feet north of Queen Street; this water line continues along Market Street past Manchester Boulevard.
- An 8-inch east–west water line runs along the northern side of Queen Street and transects the segment at that street’s intersection with Market Street.

#### **Wastewater Lines**

As shown in **Table 4.14-7**, within the Market Street segment an 8-inch east–west sewer line runs along the southern side of portions of Regent Street to the east and west of Market Street, approximately 100 feet and 25 feet from the curb line on Market Street, respectively.

No sewer lines transect the alignment along the Market Street segment.

#### **Stormwater Lines**

Within the Market Street segment, the following stormwater drains occur:<sup>75</sup>

- An east–west stormwater main drain runs along the southern side of Queen Street and transects Market Street at the intersection of those two roadways.
- a lateral connection to the northeastern corner of the Market Street and Queen Street intersection. Storm drain inlets are situated along curbs on Market Street at the northeastern and southeastern corners of that street’s intersection with Queen Street.<sup>76</sup>
- At the intersection of Market Street and Manchester Boulevard, an east–west stormwater main drain follows the northern side of Manchester Boulevard and transects Market Street; this drain contains lateral connections to both the northeastern corner of the intersection where storm drain inlets are situated on both Market Street and Manchester Boulevard, and the northwestern corner where a storm drain inlet is situated on Market Street.

<sup>75</sup> Los Angeles County Department of Public Works, *Los Angeles County Storm Drain System*, interactive map, accessed September 2021, <https://pw.lacounty.gov/fcd/StormDrain/index.cfm>.

<sup>76</sup> Los Angeles County Department of Public Works, *Los Angeles County Storm Drain System*, interactive map, accessed September 2021, <https://pw.lacounty.gov/fcd/StormDrain/index.cfm>.

**Table 4.14-7  
Existing Water and Sewer Utilities**

Segment	Utility	Description
<b>Market Street</b>		
		<ul style="list-style-type: none"> <li>An 8-inch water service pipe transitions from a 24-inch water main at the intersection of Market Street and Florence Avenue.</li> <li>The 8-inch pipe runs along the west side of the Market Street centerline just south of Florence Avenue for approximately 150-200 feet before transitioning to the east side of the centerline.</li> <li>The 8-inch line then ties into an east-west water line at Regent Street.</li> </ul>
<b>Florence Avenue to Regent Street</b>	8-inch water pipe	Follows the northern side of Regent Street and transects the alignment at the Market Street and Regent Street intersection.
	6-inch recycled water pipe	Follows the northern side of Regent Street and transects the alignment at the Market Street and Regent Street intersection.
	Storm drain	<ul style="list-style-type: none"> <li>A storm drain runs perpendicular to Market Street along the northern curb of Regent Street.</li> <li>An 8-inch water pipe runs parallel with the storm drain along the northern curb of Regent Street.</li> <li>The storm drain continues along Regent Street.</li> </ul>
<b>Regent Street to Queen Street</b>	12-inch water pipe	South of Regent Street, a north-south 12-inch pipe is initiated from a tie-in with the previously mentioned 8-inch east-west water line.
	24-inch water pipe	<ul style="list-style-type: none"> <li>The 12-inch water pipe runs along the eastern side of Market Street but transitions to the western side of the centerline about 100 feet north of Queen Street and continues south.</li> <li>A 24-inch water pipe runs along the southern curb of Regent Street.</li> <li>The line crosses Market Street and continues east along Regent Street.</li> </ul>
	12-inch water pipe	<ul style="list-style-type: none"> <li>12-inch water pipe runs along the western side of Market Street between Queen Street and Manchester Boulevard.</li> <li>The 12-inch line continues south beyond Manchester Boulevard along the western side of the roadway.</li> </ul>
<b>Queen Street to Manchester Boulevard</b>	8-inch water pipe	<ul style="list-style-type: none"> <li>An 8-inch water pipe travels along the northern side of Queen Street and crosses the segment.</li> <li>The pipe continues east-west on Queen Street.</li> </ul>
	8-inch sewer pipe	<ul style="list-style-type: none"> <li>An 8-inch sewer pipe runs along the southern side of Queen Street west of Market Street and along the centerline east of Market Street, but does not transect the alignment</li> </ul>
	Storm drain	<ul style="list-style-type: none"> <li>A storm drain runs perpendicular to Market Street along the southern portion of Queen Street and transects the alignment at this intersection, heading west.</li> </ul>

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Segment	Utility	Description
<b>Manchester Boulevard</b>		
	12-inch water pipe	<ul style="list-style-type: none"> <li>A 12-inch pipe begins approximately 200 feet west of the Market Street and Manchester Boulevard intersection and transects Market Street at the intersection of these two roadways.</li> <li>This 12-inch pipe follows the southern side of Manchester Boulevard.</li> </ul>
<b>Market Street to Locust Street</b>	10-inch sewer pipe	<ul style="list-style-type: none"> <li>A 10-inch north-south sewer pipe enters the segment through an alleyway between Market Street and Locust Street.</li> </ul>
	8-inch sewer pipe	<ul style="list-style-type: none"> <li>An 8-inch east-west sewer pipe initiates from a tie-in connected to the 10-inch sewer pipe and continues east along the center of Manchester Boulevard.</li> </ul>
	24-inch water pipe	<ul style="list-style-type: none"> <li>A 24-inch north-south water pipe runs along the western curb of Locust Street.</li> <li>The pipe crosses Manchester Boulevard and continues south along Locust Street.</li> </ul>
	12-inch water pipes	<ul style="list-style-type: none"> <li>The 12-inch east-west water pipe continues from the previous segment, along the southern side of Manchester Boulevard through the segment.</li> <li>A 12-inch north-south water pipe runs along the eastern portion of Locust Street and transects the alignment at the Locust Street and Manchester Boulevard intersection.</li> </ul>
<b>Locust Street to Hillcrest Boulevard</b>	8-inch sewer pipe	<ul style="list-style-type: none"> <li>An 8-inch north-south sewer pipe ties into the previously mentioned east-west 8-inch sewer pipe and follows the eastern side of Spruce Avenue where it proceeds north at the intersection with Manchester Boulevard.</li> <li>The 8-inch east-west sewer pipe continues through the segment at approximately the centerline.</li> <li>The 8-inch east-west sewer pipe then turns north onto Hillcrest Boulevard at the Hillcrest Boulevard and Manchester Boulevard intersection and follows the approximate centerline of that roadway.</li> </ul>
	Storm drain	<ul style="list-style-type: none"> <li>An east-west storm drain crosses Locust Street where it meets Manchester Boulevard and extends for approximately 100 feet.</li> <li>The storm drain extends near northern curb of Manchester Boulevard heading east.</li> </ul>
	12-inch water pipe	<ul style="list-style-type: none"> <li>The 12-inch north-south water pipe continues from the previous segment along the south side of Manchester Boulevard approximately 20 feet from the curb line at its closest point.</li> </ul>
<b>Hillcrest Boulevard to Spruce Avenue</b>	8-inch water pipe	<ul style="list-style-type: none"> <li>An 8-inch north-south water pipe follows the eastern side of Hillcrest Boulevard and transects the alignment at the Hillcrest Boulevard and Manchester Boulevard intersection.</li> </ul>
	6-inch water pipe	<ul style="list-style-type: none"> <li>A 6-inch water pipe travels east-west under the southern curb of Manchester Terrace.</li> <li>The 6-inch water pipe meets Manchester Boulevard and transitions to the southern/southwestern side of Manchester Boulevard.</li> <li>The 6-inch water pipe ties into the 12-inch water pipe mentioned previously.</li> </ul>

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4.14 Utilities and Service Systems

Segment	Utility	Description
	8-inch sewer pipe	<ul style="list-style-type: none"> <li>An 8-inch sewer pipe branch initiates just south of the Hillcrest intersection.</li> <li>The 8-inch sewer pipe runs along the southern portion of Manchester Boulevard.</li> </ul>
	12-inch water pipe	<ul style="list-style-type: none"> <li>The 12-inch water pipe from the previous segment continues along Manchester Boulevard along the southern portion of the street.</li> </ul>
<b>Spruce Avenue to Tamarack Avenue</b>	8-inch sewer pipe	<ul style="list-style-type: none"> <li>Another 8-inch sewer pipe branch transects the alignment at Spruce Avenue's intersection with Manchester Boulevard, traveling in a northeast-southwest direction.</li> <li>An additional 8-inch sewer pipe branch transects the alignment at Manchester Drive, just south of the Spruce Avenue intersection.</li> <li>All three previously mentioned 8-inch sewer line branches tie in together at the Spruce Avenue intersection and proceed southwest along the Spruce Avenue centerline.</li> </ul>
	6-inch water pipe	<ul style="list-style-type: none"> <li>A 6-inch water pipe travels east-west under the southern curb of Manchester Drive.</li> <li>The 6-inch water pipe meets Manchester Boulevard and transitions to the southern/southwestern side of Manchester Boulevard.</li> <li>The 6-inch water pipe ties into the 12-inch water pipe mentioned previously.</li> </ul>
	Storm drain	<ul style="list-style-type: none"> <li>A northeast-southwest storm drain transects Manchester Boulevard at the Spruce Avenue intersection and parallels the sewer line branch that extends northeast to properties across Manchester Boulevard, while to the southwest the storm drain borders the side and rear property line of the parcel located at the southern corner of the Manchester Boulevard and Spruce Avenue intersection.</li> </ul>
	12-inch water pipe	<ul style="list-style-type: none"> <li>The 12-inch east-west water pipe from the previous segment continues along Manchester Boulevard along the southern/southwestern portion of the street and ties into a 12-inch north-south water line on Prairie Avenue.</li> </ul>
<b>Tamarack Avenue to Prairie Avenue</b>	8-inch sewer pipe	<ul style="list-style-type: none"> <li>An 8-inch sewer pipe enters the segment coming northeast from Tamarack Avenue and continues east along Manchester Boulevard, located approximately five feet from the southern curb line at its closest point.</li> <li>This line crosses to the northern side of Manchester Boulevard approximately 80 feet before Prairie Avenue and extends to the northeast towards Inglewood Park Cemetery.</li> </ul>
	60-inch DWP pipe	<ul style="list-style-type: none"> <li>A 60-inch north-south DWP pipe runs along the eastern side of Prairie Avenue.</li> <li>The line continues south onto the next segment.</li> </ul>
<b>Prairie Avenue</b>		
<b>Manchester Boulevard</b>		

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4.14 Utilities and Service Systems

Segment	Utility	Description
<b>Nutwood Street to Nutwood Street</b>	36-inch recycled water pipe	<ul style="list-style-type: none"> <li>A 36-inch north-south recycled water pipe enters the segment about midway between Manchester Boulevard and Nutwood Street.</li> <li>The line continues south onto the next segment.</li> </ul>
	8-inch water pipe	<ul style="list-style-type: none"> <li>An 8-inch north-south water pipe travels south down Prairie Avenue on the western side of the street.</li> <li>The line continues south onto the next segment.</li> </ul>
	24-inch sewer pipe	<ul style="list-style-type: none"> <li>A 24-inch east-west sewer pipe runs along the western side of the street, close to the center line.</li> <li>The line continues south onto the next segment.</li> </ul>
	10-inch sewer pipe	<ul style="list-style-type: none"> <li>A 10-inch north-south sewer pipe runs along the eastern side of Prairie Avenue.</li> <li>The line continues south onto the next segment.</li> </ul>
	Storm drain	<ul style="list-style-type: none"> <li>A storm drain runs in an east-west direction through the segment, midway between Manchester Boulevard and Nutwood Street.</li> </ul>
	60-inch DWP pipe	<ul style="list-style-type: none"> <li>A 60-inch DWP water pipe runs along the eastern side of Prairie Avenue.</li> <li>The line continues south onto the next segment.</li> </ul>
<b>Nutwood Avenue to Kelso Street/Pincay Drive</b>	36-inch recycled water pipe	<ul style="list-style-type: none"> <li>The 36-inch recycled water pipe continues from the previous segment.</li> <li>The 36-inch recycled water pipe continues through the center of the segment.</li> <li>It shifts slightly west and then east a few feet and then continues south along Prairie Avenue.</li> </ul>
	8-inch water pipe	<ul style="list-style-type: none"> <li>The 8-inch water pipe continues from the previous segment on the western side of the street.</li> </ul>
	24-inch sewer pipe	<ul style="list-style-type: none"> <li>A 24-inch sewer pipe runs along the western side of Prairie Avenue proximate to the curb line.</li> <li>The line continues south onto the next segment.</li> </ul>
	10-inch sewer pipe	<ul style="list-style-type: none"> <li>A 10-inch sewer pipe runs along the eastern side of Prairie Avenue proximate to the curb line.</li> <li>The line continues south onto the next segment.</li> </ul>
<b>Kelso Street/Pincay Drive to La Palma Drive</b>	60-inch DWP pipe	<ul style="list-style-type: none"> <li>The 60-inch DWP pipe continues from the previous segment just east of the center line of Prairie Avenue</li> <li>Midway through the segment, the pipe shifts under the eastern curb of Prairie Avenue where it continues south until Century Boulevard.</li> </ul>
	36-inch recycled water pipe	<ul style="list-style-type: none"> <li>The 36-inch recycled water pipe continues from the previous segment.</li> <li>The 36-inch recycled water pipe continues just east of the center line south down Prairie Avenue.</li> </ul>

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4.14 Utilities and Service Systems

Segment	Utility	Description
	east-west water pipes	<ul style="list-style-type: none"> <li>An east-west water pipe travels along the southern portion of Kelso Street/Pincay Drive and transsects the alignment at this intersection.</li> <li>Additionally, an east-west running water line follows the southern side of Kelso Street/Pincay Drive beneath the sidewalks; this water line pivots south of the Kelso Street/Pincay Drive intersection and extends approximately 200 feet south on both sides of Prairie Avenue before transsecting the right-of-way and meeting.</li> </ul>
	8-inch north-south water pipe	<ul style="list-style-type: none"> <li>The 8-inch north-south water pipe continues from the previous segment on the western side of the street.</li> <li>The line continues south onto the next segment.</li> </ul>
	24-inch sewer pipe	<ul style="list-style-type: none"> <li>The previously mentioned 24-inch north-south sewer pipe continues from the previous segment on the western portion of Prairie Avenue.</li> </ul>
	10-inch sewer pipe	<ul style="list-style-type: none"> <li>This pipe ties into a 10-inch east-west sewer line following the northern portion of Kelso Street/Pincay Drive west of Prairie Avenue. This east-west sewer line also includes a branch sewer line extending from the center of the Prairie Avenue and Kelso Street/Pincay Drive intersection to the southeastern corner of that intersection.</li> <li>The previously mentioned 10-inch north-south sewer pipe continues from the previous segment on the eastern portion of Prairie Avenue.</li> <li>This pipe ties into a 10-inch east-west sewer line following the approximate centerline of Kelso Street/Pincay Drive east of Prairie Avenue. This east-west sewer line also includes a branch sewer line extending from the center of the Prairie Avenue and Kelso Street/Pincay Drive intersection to the southeastern corner of that intersection.</li> <li>Past the Kelso Street/Pincay Drive intersection, the 10-inch north-south sewer line extends for approximately 180 feet along the eastern side of the right-of-way before proceeding east into the adjacent Hollywood Park property.</li> </ul>
	60-inch DWP pipe	<ul style="list-style-type: none"> <li>The 60-inch water pipe continues from the previous segment through this segment, under the eastern curb of Prairie Avenue.</li> <li>The line continues south onto the next segment.</li> </ul>
	36-inch recycled water pipe	<ul style="list-style-type: none"> <li>The 36-inch recycled water pipe continues from the previous segment.</li> <li>The 36-inch recycled water pipe continues just east of the center line down Prairie Avenue.</li> </ul>
	8-inch water pipe	<ul style="list-style-type: none"> <li>An 8-inch water pipe travels from the previous segment, just west of the center line on Prairie Avenue.</li> <li>Tie-ins are located to the west along La Palma Drive, Buckthorn Street, and Arbor Vitae Street.</li> </ul>

**La Palma Drive to Arbor Vitae Street**

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4.14 Utilities and Service Systems

Segment	Utility	Description
	Storm drain	<ul style="list-style-type: none"> <li>At Buckthorn Street's intersection with Prairie Avenue, a 33-inch north-south storm drain begins in the eastern portion of the right-of-way, approximately 30 feet from the eastern curb line.</li> <li>An additional tie-in is located at Arbor Vitae Street; this tie-in includes three branches.</li> </ul>
	10-inch sewer pipe	<ul style="list-style-type: none"> <li>The 10-inch sewer pipe continues from the previous segment within the adjacent Hollywood Park property to the east, approximately 43 feet east of the existing eastern curb line along Prairie Avenue. This line continues south until Arbor Vitae Streets, whereupon it proceeds east along the centerline of that roadway.</li> </ul>
	60-inch DWP pipe	<ul style="list-style-type: none"> <li>The 60-inch water pipe continues from the previous segment through this segment, under the eastern curb of Prairie Avenue.</li> <li>Just south of the Arbor Vitae Street intersection, the pipe shifts to the western curb, where it continues south through the remainder of the segment and onto the next segment.</li> </ul>
	36-inch recycled water pipe	<ul style="list-style-type: none"> <li>The 36-inch recycled water pipe continues from the previous segment along the center line of Prairie Avenue.</li> <li>Just north of Hardy Street the pipe shifts toward the eastern side of Prairie Avenue where it continues onto the next segment.</li> </ul>
	8-inch water pipe	<ul style="list-style-type: none"> <li>The 8-inch water pipe from the previous segment shifts west just south of Arbor Vitae Street.</li> <li>The line continues south onto the next segment under the western side of Prairie Avenue.</li> </ul>
	8-inch sewer pipe	<ul style="list-style-type: none"> <li>The sewer pipe begins just south of the Arbor Vitae Street intersection, under the western curb along Prairie Avenue.</li> <li>The line continues south onto the next segment.</li> </ul>
	Storm drain	<ul style="list-style-type: none"> <li>The 33-inch north-south storm drain continues south; a tie-in is located approximately 400 feet north of the Hardy Street intersection.</li> <li>Approximately 25 feet after the tie-in north of Hardy Street, the storm drain main expands to a 39-inch line.</li> <li>Two additional drain branch tie-ins are located at the Hardy Street intersection.</li> </ul>

**Arbor Vitae Street to Hardy Street**

Source: Utilities Engineering Report, Gannett Fleming, August 2021.

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### Manchester Boulevard Segment

The Manchester Boulevard segment runs within the right-of-way from Market Street east on Manchester Boulevard, turning south on Prairie Avenue.

#### Water Lines

As shown in **Table 4.14-7**, several different water lines exist within the Manchester Boulevard segment. These include:

- A 12-inch east–west water pipe runs along the southern side of Manchester Boulevard within 12 feet of the southern curb face, then continues throughout the Manchester Boulevard segment until it meets a tie-in at the Manchester Boulevard and Prairie Avenue intersection.
- At the Manchester Boulevard and Locust Street intersection, a 24-inch north–south water line runs along the western side of Locust Street and transects Manchester Boulevard at the intersection of the two roadways.
- A 12-inch north–south water line runs along the eastern side of Locust Street, crosses Manchester Boulevard at this intersection, and continues along Locust Street in both directions.
- An 8-inch north–south water line follows the eastern side of Hillcrest Boulevard and transects Manchester Boulevard at the intersection of those two roadways.
- Proceeding east on Manchester Boulevard, the alignment is transected at Manchester Terrace by a 6-inch east–west water line that ties into the 12-inch east–west water line along the southern/southwestern edge of Manchester Boulevard; the 6-inch east–west water line continues east along the southern curb of Manchester Terrace.
- At Manchester Boulevard’s intersection with Manchester Drive, the alignment is again transected by a 6-inch east–west water line that ties into the 12-inch water line along the southern/southwestern edge of Manchester Boulevard; the 6-inch water line continues east along the southern curb of Manchester Drive.

#### Wastewater Lines

As shown in **Table 4.14-7**, within the Manchester Boulevard segment the following wastewater lines occur within the right-of-way:

- A 10-inch north–south sewer line follows the alley approximately midpoint in between Market Street and Locust Street; this sewer line transects Manchester Boulevard approximately 210 feet east of Market Street.
- An 8-inch east–west sewer line ties into this north–south sewer line and extends east along the approximate centerline of Manchester Boulevard. This sewer line also connects with two north-south sewer lines at Locust Street and Hillcrest Boulevard as described below.

- The above noted 8-inch east–west sewer line in the centerline of Manchester Boulevard ties in with another 8-inch north–south sewer at Locust Street, which continues northbound on the eastern side of Locust Street.
- The above noted 8-inch east–west sewer line on Manchester Boulevard extends east from Locust Street until Hillcrest Boulevard, where it proceeds north and follows the approximate centerline of Hillcrest Boulevard.
- An 8-inch north–south sewer line follows the eastern side of Hillcrest Boulevard south of Manchester Boulevard, approximately 35 feet southwest of the proposed Project.
- An 8-inch east–west sewer line branch is located along the southern/southwestern edge of Manchester Boulevard beginning at the Manchester Terrace intersection and continuing until Spruce Avenue.
- At Spruce, the above east–west 8-inch sewer line meets three additional sewer lines which proceed within the roadway rights-of-way in the following directions: 1) a branch extending northeast to properties across Manchester Boulevard, 2) a branch extending southeast to the Manchester Drive centerline, and 3) a sewer line main extending southwest along the Spruce Avenue centerline.
- At Tamarack Avenue an 8-inch east–west sewer line extends in a northeastern–southwestern direction into the alignment. This line follows the southern edge of the Manchester Boulevard right-of-way and proceeds east. Approximately 80 feet before Prairie Avenue, this line shifts to the northern side of Manchester Boulevard and extends to the northeast towards Inglewood Park Cemetery.

#### Stormwater Lines

Within the Manchester Boulevard segment, the following stormwater drains occur:<sup>77</sup>

- At the Locust Street and Manchester Boulevard intersection, an east–west storm drain parallels the northern edge of Manchester Boulevard for approximately 100 feet; additionally, storm drain inlets are located at the northeastern and southeastern corners of this intersection along Manchester Boulevard.
- At the Manchester Boulevard and Spruce Avenue intersection, a northeast–southwest storm drain transects the alignment and parallels the sewer line extending northeast to properties across Manchester Boulevard, while to the southwest the storm drain borders the side and rear property line for the parcel located at the southern corner of the Manchester Boulevard and Spruce Avenue intersection. Storm drain inlets are located on Manchester Boulevard at the eastern and southern points of this intersection.

<sup>77</sup> Los Angeles County Department of Public Works, *Los Angeles County Storm Drain System*, interactive map, accessed September 2021, <https://pw.lacounty.gov/fcd/StormDrain/index.cfm>.

### Prairie Avenue Segment

The Prairie Avenue segment extends from its intersection with Manchester Boulevard south to the intersection at Hardy Street, as shown in **Figure 3.0-3: Project Vicinity Map**. The proposed Project would not extend past the Prairie Avenue and Hardy Street intersection.

### Water Lines

As shown in **Table 4.14-7**, The following water lines occur within the right-of-way of the Prairie Avenue segment:

- A 60-inch north–south DWP water pipe runs along Prairie Avenue for the length of the alignment segment. The DWP line runs just east of the centerline on Prairie Avenue until approximately 250 feet south of the Kelso Street/Pincay Drive intersection. At this point, the line shifts to the eastern side of Prairie Avenue beneath the existing sidewalk and continues in this location until Century Boulevard.
- From Manchester Boulevard, an 8-inch north–south water pipe travels south down Prairie Avenue towards the western side of the street approximately 25 feet from the western curb, transitioning further west under the western curb of Prairie Street at the Arbor Vitae Street intersection.
- This 8-inch water pipe continues down Prairie Avenue until it terminates just south of 99th Street and north of Century Boulevard. Along its length on Prairie Avenue, water lines of varying diameters tie into the 8-inch water pipe from its west at Nutwood Street, Kelso Street, La Palma Drive, Buckthorn Street, Arbor Vitae Street, Hardy Street, 97th Street, and 99th Street.
- An east–west running water line follows the southern side of Kelso Street/Pincay Drive beneath the sidewalks; this water line pivots south of the Kelso Street/Pincay Drive intersection and extends approximately 200 feet south on both sides of Prairie Avenue before transecting the right-of-way and joining the other side.

### Wastewater Lines

The following wastewater lines occur with the right-of-way of the Prairie Avenue segment:

- From Manchester Boulevard until Kelso Street/Pincay Drive a 10-inch sewer line and a 24-inch north–south sewer line run on the eastern and western edges of Prairie Avenue, respectively, whereupon they tie into an east–west sewer line that follows Kelso Street/Pincay Drive.
- Along Pincay Drive east of Prairie Avenue, the east–west sewer line follows the approximate centerline; west of Prairie Avenue along Kelso Street this sewer line follows the northern edge of the roadway. This east–west sewer line also includes sewer line branch that extends from the center of the Prairie Avenue and Kelso Street/Pincay Drive intersection to the southeastern corner of the Prairie Avenue and Kelso Street/Pincay Drive intersection.
- Past the Kelso Street/Pincay Drive intersection, the 10-inch north–south sewer line extends south for approximately 180 feet along the eastern side of the right-of-way before proceeding east into the

adjacent Hollywood Park property. The 10-inch sewer line continues south within the adjacent Hollywood Park property, approximately 43 feet east of the existing eastern curb line along Prairie Avenue, until Arbor Vitae Street, whereupon it continues east along the centerline of Arbor Vitae Street.

- A 36-inch north–south recycled water pipe runs along Prairie Avenue in the centerline from Manchester Boulevard until it shifts to the eastern portion of the right-of-way just north of the Hardy Street intersection in between the 60-inch DWP line and storm main (discussed below); this 36-inch line extends further south through the segment past Century Boulevard and 102nd Street.

### Stormwater Lines

Similar to other segments along the Project alignment, all storm drains and mains in this segment are gravity flow and consist of reinforced concrete pipe.<sup>78</sup> The following stormwater drains occur along the Prairie Avenue segment:

- Approximately midway between Manchester Boulevard and Nutwood Street, a storm drain transects the alignment in an east–west direction. This drain diverges in the southeastern direction into the Forum property after exiting the right-of-way.
- At Buckthorn Street’s intersection with Prairie Avenue, a 33-inch north–south storm drain begins in the eastern portion of the right-of-way, approximately 30 feet from the eastern curb line, and extends through the length of the Manchester Boulevard segment. The storm drain includes branch tie-ins at multiple points along its length; these consist of points at Arbor Vitae Street, Hardy Street, 97th Street, 99th Street, Century Boulevard, 101st Street, and 102nd Street. Additionally, the storm drain increases in diameter as it proceeds south; the pipe expands from 33 inches to 39 inches at Hardy Street. Previously mentioned branch tie-ins to the storm drain are described as follows:
  - At Arbor Vitae Street, three stormwater drain branches tie into the main drain at the Arbor Vitae Street intersection. At the northern portion of Prairie Avenue and Arbor Vitae Street, two of these branches tie into the main line; the remaining branch extends to the northeastern corner of the intersection and the other to the northwest. At the southern portion of the intersection, a third branch ties in and extends to the northeastern corner of the intersection. Storm drain inlets are located along Prairie Avenue at the northeastern and northwestern corners of the intersection and along Arbor Vitae Street at the northwestern corner.
  - At Hardy Street, a stormwater drain branch tie-in is located approximately 400 feet north of the Hardy Street intersection and extends northeast into the Hollywood Park property. Approximately 25 feet after this point the storm drain main expands to a 39-inch line.
  - The Hardy Street intersection includes two branch tie-ins to the main drain at northern and southern points of the intersection; the northern tie-in extends to the northwestern corner of the

<sup>78</sup> County of Los Angeles Department of Public Works, *Los Angeles County Storm Drain System*, interactive map, accessed September 2021, <https://pw.lacounty.gov/fcd/StormDrain/index.cfm>.

intersection while the southern tie-in extends to the northeast and follows the Hardy Street centerline into the adjacent Hollywood Park property.

- Storm drain inlets are located on the eastern side of Prairie Avenue approximately 400 feet north of Hardy Street, as well as on the northeastern and northwestern corners of the Hardy Street intersection along Prairie Avenue.
- Moving south, an 8-inch north–south sewer pipe begins along Prairie Avenue approximately 100 feet south of the Arbor Vitae Street intersection and travels under the western curb. The 8-inch sewer pipe continues south in the same location and would continue under Hardy Street where the guideway would end at the Prairie Avenue/Hardy Street Station.

**Electrical Utilities**

Within the proposed Project’s alignment, electrical lines occur as noted.

**Market Street Segment**

The guideway would begin at the Market Street/Florence Avenue station, situated in the public right-of-way in between Florence Avenue and Regent Street, and would extend south along Market Street. According to SCE, there is one existing 16 kilo-volt-ampere (kva) circuit currently available along Market Street.<sup>79</sup>

**Manchester Boulevard Segment**

The guideway would shift east onto Manchester Boulevard at the intersection with Market Street. As shown in **Table 4.14-8: Existing Electrical Utilities**.

**Prairie Avenue Segment**

At Prairie Avenue, the guideway would then proceed south until Hardy Street. As shown in **Table 4.14-8**, three large electrical lines, sizes 16 kva, 17.5 kva, and 50 kva, run north-south under Prairie Avenue from Manchester Boulevard to Hardy Street where the guideway would end at the Prairie Avenue/Hardy Street station.

<sup>79</sup> Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021.

**Table 4.14-8  
Existing Electrical Utilities**

Segment	Description	Provider
<b>Prairie Avenue</b>		
Manchester Boulevard to Nutwood Street	Large electrical lines (16 kva, 17.5 kva, 50 kva)	SCE
Nutwood Avenue to Kelso Street/Pincay Drive	Large electrical lines (16 kva, 17.5 kva, 50 kva)	SCE
Kelso Street/Pincay Drive to La Palma Drive	Large electrical lines (16 kva, 17.5 kva, 50 kva)	SCE
La Palma Drive to Arbor Vitae Street	Large electrical lines (16 kva, 17.5 kva, 50 kva)	SCE
Arbor Vitae to Hardy Street	Large electrical lines (16 kva, 17.5 kva, 50 kva)	SCE

Source: Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021.

**Gas Utilities**

**Market Street Segment**

The guideway would begin at the Market Street/Florence Avenue station, situated in the public right-of-way in between Florence Avenue and Regent Street, and would extend south along Market Street. There are no existing gas utilities within the Market Street segment.

**Manchester Boulevard Segment**

The guideway then shifts to run down Manchester Boulevard at the intersection with Market Street. As shown in **Table 4.14-9: Existing Gas Utilities**, a gas line runs across the alley between Market Street and Locust Street, tie-ins are shown stemming west for approximately 100 feet along the southern curb and east for approximately 100 feet along the northern curb of Manchester Boulevard. A gas line runs down the eastern side of Locust Street; a tie-in stems off under the southern curb of Manchester Boulevard and extends for approximately 185 feet. A gas line follows Hillcrest Boulevard in a northeast–southwest direction and transects Manchester Boulevard at the intersection of the two roadways; this gas line contains a tie-in to the proposed MSF along Hillcrest Boulevard, approximately 275 feet southwest of the Manchester Boulevard and Hillcrest Boulevard intersection.

The north–south gas line along Hillcrest Boulevard contains a tie-in to an east–west gas line which follows under the northern curb of Manchester Boulevard; this tie-in travels under the northern sidewalk of Manchester Boulevard in between Hillcrest Boulevard and Manchester Terrace.

An east–west gas line enters the segment from Manchester Drive and crosses along Manchester Boulevard just south of Spruce Avenue. The line continues under the southern curb of Manchester Boulevard throughout the remainder of the segment and terminates approximately 195 feet of the Prairie Avenue intersection.

### Prairie Avenue Segment

The guideway then shifts to run down Prairie Avenue at the intersection with Manchester Boulevard. As shown in **Table 4.14-9**, a gas line travels south along the western side of Prairie Avenue, continuing throughout the segment past Century Boulevard.

There are no high-pressure distribution lines within the footprint of the proposed Project. The closest high-pressure distribution line is located within the street right-of-way along Pincay Drive, starting from the intersection at Crenshaw Boulevard and ending approximately 500 feet before the intersection at South Prairie Avenue. Minor laterals connect these lines to points of service. Two 30-inch gas transmission lines run beneath the rights-of-way of local roadways; one runs along Crenshaw Boulevard from north to south, approximately 1 mile east of South Prairie Avenue and the other runs along West 104th Street from east to west, approximately 0.25 miles south of West Century Boulevard.<sup>80</sup>

A gas line tie-in from the northern curb of Kelso Street/Pincay Drive extends just north onto the western curb of Prairie Avenue but does not transect the alignment. The north-south gas line contains an additional gas line tie-in from its west at Arbor Vitae Street, which follows the northern portion of that roadway.

#### 4.14.4.3 Adjusted Baseline

This section assumes the Adjusted Baseline Environmental Setting as described in **Section 4.0: Environmental Impact Analysis, 4-5: Adjusted Baseline**. Specifically, operation of land uses included in the Hollywood Park Specific Plan (HPSP) would require additional utility services for water, wastewater treatment or storm water drainage, electric power, natural gas, and telecommunications. The HPSP would utilize similar service providers as the proposed Project for utility supplies and infrastructure. Similar to the proposed Project, the HPSP was required to analyze impacts to utility services and infrastructure prior to approval.

As shown in **Figure 3.0-2: Project Location Map** a segment of the proposed Project would be adjacent to the HPSP along Prairie Avenue. The HPSP provides guidelines and standards for improvements in the public right-of-way within the HPSP, which includes approximately 0.5 miles of street frontage along Prairie Avenue. Within the HPSP, minimum building setback requirements involve 30 feet of separation from the roadway along Prairie Avenue extending from Pincay Drive/Kelso Street to approximately midblock between Hardy Street and 97th Street.<sup>81</sup>

<sup>80</sup> Southern California Gas Company, "Los Angeles County: Gas Transmission and High Pressure Distribution Pipeline Interactive Map," accessed September 2021, <https://socialgas.maps.arcgis.com/apps/webappviewer/index.html?id=c85ced1227af4c8aae9b19d677969335>.

<sup>81</sup> City of Inglewood, *Hollywood Park Specific Plan*, "Exhibit 6-5- Minimum Building Setbacks," 6-30, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015.

**Table 4.14-9**  
**Existing Gas Utilities**

Segment	Description
<b>Manchester Boulevard</b>	
Market Street to Locust Street	<ul style="list-style-type: none"> <li>A north-south gas line runs along the alley and through the segment approximately midway between Market Street and Locust Street.</li> <li>Gas line tie-ins are shown stemming west along the southern curb of Manchester Boulevard and east along the northern curb of Manchester Boulevard.</li> </ul>
Locust Street to Hillcrest Boulevard	<ul style="list-style-type: none"> <li>A gas line crosses Manchester Boulevard at Locust Street and Hillcrest Boulevard along the eastern sides of those roadways.</li> <li>A gas line branch stems from the line on Locust Street and follows under the southern side of Manchester Boulevard; this branch terminates prior to Hillcrest Boulevard.</li> <li>The gas line on Hillcrest Boulevard ties into an east-west gas line that follows the northern side of Manchester Terrace; this tie-in follows under the sidewalk on the northern side of Manchester Boulevard in between Hillcrest Boulevard and Manchester Terrace.</li> </ul>
Spruce Avenue to Tamarack Avenue	<ul style="list-style-type: none"> <li>A gas line enters the segment from Manchester Drive and crosses along Manchester Boulevard just south of Spruce Avenue.</li> <li>The line continues under the southern curb of Manchester Boulevard throughout the remainder of the Manchester Boulevard alignment segment.</li> </ul>
Tamarack Avenue to Prairie Avenue	<ul style="list-style-type: none"> <li>The gas line continues from the previous segment under the south curb of Manchester Boulevard.</li> <li>The gas line terminates just before the Prairie Avenue intersection.</li> </ul>
Manchester Boulevard to Prairie Avenue	<ul style="list-style-type: none"> <li>A gas line travels south along the western side of Prairie Avenue and enters the alignment at Manchester Boulevard.</li> <li>This gas line travels south through the remainder of the Prairie Avenue alignment segment.</li> </ul>
<b>Prairie Avenue</b>	
Nutwood Avenue to Kelso Street/Pincay Drive	<ul style="list-style-type: none"> <li>A gas line tie-in from the northern curb of Kelso Street/Pincay Drive extends just north onto the western curb of Prairie Avenue but does not transect the alignment.</li> </ul>

Source: Utilities Engineering Report, Gannett Fleming, August 2021.

Currently, no operational utility infrastructure is located within the 30-foot setback area; however, an abandoned oil line has been identified within the setback area south of Arbor Vitae Street and north of Hardy Street. This abandoned line would not require any action for use of this area.

### 4.14.5 THRESHOLDS OF SIGNIFICANCE

Criteria outlined in CEQA Guidelines were used to determine the level of significance of potential impacts from the relocation or construction of new or expanded utilities. As discussed in *Section 4.14.1*, seven

screening criteria related to utilities and service systems of Appendix G of CEQA Guidelines were eliminated from further analysis in this EIR. The below threshold identified in the Initial Study indicates that a project would have a significant impact in relation to the relocation or construction of new or expanded utilities if it were to:

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

Impacts found to be less than significant for the seven screening thresholds are further discussed in **Section 6.3** of this Recirculated Draft EIR.

#### 4.14.6 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

**Impact U-1: Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

The proposed Project is a fully elevated guideway and stations that accommodate an Automated Transit System (ATS system). The guideway spans a total length of approximately 1.6 miles with dual set of tracks (for train travel in both directions and connecting three, center-platform stations, as shown in **Figures 3.0-4a** through **3.0-4i: Proposed Project Alignment Plans and Profiles**). The technology will be self-propelled, rubber-tire ATS train or monorail.

The ATS train tracks are spaced as close together as possible with tracks diverging at approaches to/from stations and at stations and to accommodate switches. The elevated guideway would be supported by single or double column/bents (depending on the train track separations and the guideway location relative to potential column placements). While the final column locations and designs will be by the selected design/build/finance/operate/maintain (DBFOM) contractor, the alignment has been optimized to minimize the number of columns and potential double column/bents to the extent feasible. The procurement documents for the DBFOM contractor would identify the known utility locations and require the DBFOM contractor to locate columns to avoid and/or minimize impacts to existing utilities.

As noted in **Tables 4.14-7, 4.14-8, and 4.14-9**, multiple utilities exist under Market Street, Manchester Boulevard, and Prairie Avenue.

## Construction

### Relocation or Construction of Utilities

The Utility Report evaluated potential conflicts with the proposed Project columns and the existing utility lines along the Project alignment.<sup>82</sup> Existing roadways and infrastructure along the Project alignment will 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. As discussed in **Section 3.0: Project Description, 3.5.6: Roadway Improvements** of the Project Description, roadway reconfiguration along Market Street, Manchester Boulevard and Prairie Avenue are necessary to ensure that the existing roadway travel capacity is not diminished or reduced in the final as-built conditions for the proposed Project. The column locations and spacings will be defined by the DBFOM contractor as part of their final designs to be guided by aesthetic principles defined and adopted as part of the EIR. The columns, for the most part, will be required to be located within the public right of way, either within sidewalks or parking lanes.

#### Market Street/Florence Avenue Segment

The Market Street/Florence Avenue station would be supported by dual columns per span from the northern terminus to just north of Regent Street. At this point, the dual lane tracks are separated to accommodate the Market Street/Florence Avenue station's center platform and turn-back switches that facilitate in-bound ATS trains to switch to the other track for its outbound journey. As the guideway approaches Regent Street, the dual lane tracks converge and are supported by single columns until Manchester Boulevard. The columns would be primarily located in the existing median along Market Street between Regent Street to Manchester Boulevard. As discussed previously, the column locations and spacings will be defined by the DBFOM contractor as part of their final designs to be guided by aesthetic principles defined and adopted as part of the EIR.

There are several major utility lines identified within the Market Street segment of the proposed Project including water, sewer, stormwater, and electrical lines. The Utility Report indicates that there would be potential column conflicts with streetlights at the intersection of Market Street and Regent Street. Moreover, along Market Street and north of Regent Street, there is a water line that would potentially conflict with a proposed column. Between Regent Street and Queen Street along Market Street, there is a water line that would potentially conflict with a proposed column. South of Queen Street and along Market Street, there are three water lines that would potentially conflict with a proposed column. At the northeast

<sup>82</sup> *Utilities Engineering Report*, Gannett Fleming, August 2021.

#### 4.14 Utilities and Service Systems

corner of Manchester Boulevard and Market Street, there is an AT&T telecommunications line that would potentially conflict with a proposed column. Additionally, several storm drains have been identified along Market Street which may require relocation due to column placement.

In addition, SCE has determined that the proposed Project would likely utilize the existing 16 kva circuit located within the right-of-way of Market Street to provide power for the proposed Project. SCE has also noted that utilization of this existing circuit would require infrastructure upgrades to accommodate the proposed Project.<sup>83</sup>

As the proposed Project columns would potentially conflict with several existing utility lines along Market Street, impacts would be potentially significant.

##### Manchester Boulevard Segment

As the guideway turns east onto Manchester Boulevard, the guideway would transition from single columns to one half straddle bent to support the turn onto Manchester Boulevard before going back to single columns in a new median located in Manchester Boulevard. As the guideway approaches the MSF it will widen and require straddle bents that will span across northern and eastern portions of the intersection of Market Street and Manchester Boulevard. From the intersection of MSF to Prairie Avenue, a combination of single column supports and straddle bents across Manchester Boulevard will be used. The intersection of Market Street and Manchester Boulevard to Locust Street, singular columns would also be arranged within the public right-of-way on the southern side of Manchester Boulevard. Some columns may be located within the existing parking lane on the southern side of Manchester Boulevard, requiring the elimination of parking.

Straddle bent columns will be placed in sidewalks and/or parking lanes so as to not reduce the existing roadway capacity of Manchester Boulevard. Single column supports will be located in a median within Manchester Boulevard that will not restrict existing traffic capacity or turning movements at intersections to other City streets.

Several major utility lines have been identified within the Manchester Boulevard segment of the Project alignment including water, sewer, wastewater, stormwater, and gas lines. The Utility Report indicates that there would be potential column conflicts with streetlights at the northeast corner of Market Street and Manchester Boulevard and along the north and south sides of Manchester Boulevard from Locust Street to Hillcrest Boulevard. Along Manchester Boulevard from Hillcrest Boulevard to Prairie Avenue, streetlights would potentially conflict with nearly all south/west-side and some north/east-side straddle-bent

<sup>83</sup> Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021.

#### 4.14 Utilities and Service Systems

columns. A street light line runs directly through the proposed station on the southwest corner of Manchester Boulevard and Prairie Avenue. There are underground SCE lines that would potentially affect all four proposed columns in the corners at the intersection of Hillcrest Boulevard and Manchester Boulevard. There is a sewer line running north-south across Manchester Boulevard between the intersections of Market Street and Locust Street that is in close proximity to a proposed column. The line connects to a City sewer which runs east-west along Manchester Boulevard and is in close proximity to five proposed columns. Along Manchester Boulevard between Market Street and Locust Street, there is a water line which would potentially conflict with a proposed column. On Manchester Boulevard, south of Manchester Drive, there are two water line laterals which would potentially conflict with a guideway column. Along Manchester Boulevard between Market Street and Locust Street, there is a 3-inch gas line running north-south that would potentially conflict with one proposed column. On the southern side of Manchester Boulevard, just south of Spruce Street, there is a 2-inch gas line which would potentially conflict with one proposed column and is in closer proximity to several others leading east to Prairie Avenue. As discussed previously, at the northeast corner of Manchester Boulevard and Market Street, there is an AT&T telecommunications line that would potentially conflict with a proposed column.

As the proposed Project columns would potentially conflict with several existing utility lines along Manchester Boulevard, impacts would be potentially significant.

##### Prairie Avenue Segment

Three straddle bent columns will support the guideway as it proceeds south onto Prairie Avenue just past Nutwood Street. As the guideways converge, they will transition to single column supports located on the western side of Prairie. The guideway begins diverging south of Victory Street to the west of Prairie Avenue on its approach to the Prairie Ave/Hardy Street station and will be supported by straddle bents in the sidewalk and west of the public right of way.

Several major utility lines have been identified within the Prairie Avenue segment of the alignment including water, sewer, wastewater, stormwater, electrical, and gas lines. The proposed Project's Utility Report indicates that a street light line runs directly through the proposed station on the southwest corner of Manchester Boulevard and Prairie Avenue. At the intersections of Kelso Street, Touchdown Drive, and Arbor Vitae Street, with Prairie Avenue, street light lines would potentially conflict with at least one proposed column. Along the west side of Prairie Avenue beginning at Manchester Boulevard, an underground SCE line would potentially affect the station and every proposed column until Arbor Vitae Street. Along Prairie Avenue from Arbor Vitae Street to Hardy Street, there are underground SCE lines which either directly impact, or are very close to, almost every proposed column. There is an overhead SCE line running east-west across the Kelso Street and Prairie Avenue intersection which would potentially

conflict with the proposed guideway depending on height. There is a 12-inch LACSD sewer line which runs north-south along Prairie Avenue and is very close proximity to several proposed columns from Manchester Boulevard to Kelso Street. South of Arbor Vitae Street, along the western sidewalk of Prairie Avenue, there is a City 8-inch sewer line that would potentially affect every proposed column until Victory Street. Along Prairie Avenue there is an 8-inch water line which would potentially conflict with, or is in very close proximity to, every proposed column from Victory Street to Hardy Street. South of Kelso Street there is an 8-inch gas line on the west side of Prairie Avenue which would potentially affect every proposed column up until Victory Street. South of Victory Street and west of Prairie Avenue, there is a gas line of unidentified dimension which would potentially affect one proposed column on each straddle bent to the end of the line. There is a telecommunications line on the west side of Prairie Avenue from La Palma Drive to Buckthorn Street that would potentially conflict with four columns.

As the proposed Project columns would potentially conflict with several existing utility lines along Prairie Avenue, impacts would be potentially significant.

#### **Solid Waste**

The City is served by CDS, which transfers solid waste to the Sunshine Canyon Landfill in Sylmar, California. The Sunshine Canyon Landfill currently receives an average of 3 million tons per year of solid waste and is permitted to receive a maximum of 4.4 million tons per year of solid waste. The landfill has approximately 62,082,860 tons of remaining capacity. Based on the landfill's throughput and availability of land, the landfill has a cease operation date of 2037. Construction of the proposed Project would include demolition of existing buildings as previously noted and would result in the generation of various construction waste including scrap lumber, scrap finishing materials, various scrap metals, and other recyclable and nonrecyclable construction-related wastes. Recyclable construction materials, including concrete, metals, wood, and various other recyclable materials would be diverted to recycling facilities. Given the remaining existing capacity at the Sunshine Canyon Landfill, the proposed Project would not require construction of new or expanded solid waste facilities.

The City is required to maintain the 50 percent diversion rate required by the State through the California Solid Waste Management Act. The DBFOM contractor would contract with CDS for bin removal activities. Compliance with construction and operational debris removal and recycling requirements would occur with the City's Environmental Services Department and CDS's Sunshine Canyon Landfill. The proposed Project would not conflict with federal, State, or local statutes and regulations related to management and reduction of solid waste. Therefore, the impact of solid waste generated by construction of the Project would be less than significant.

#### **Operation**

##### **Telecommunication**

The MSF command, control, and communications (CCC) facilities, including the CCR and the CCC equipment room, are planned to be co-located at the MSF.<sup>84</sup> CCC equipment is required for train control and supervision, power control and supervision, station doors, dynamic graphics, closed-circuit television (CCTV), public address, radio, fire detection, and other system-related elements. Additional CCC equipment is located at stations and along the wayside. The CCR provides for the supervision of the overall ATS operation. It houses all display, safety, and communications equipment required to monitor and control the ATS system. Typical equipment includes large work consoles and monitor banks (for system overview, CCTV, etc.). The CCC equipment room would be adjacent to the CCR and houses all servers and equipment for the control of the ATS system. The equipment room is also sized to house the uninterruptible power supplies (UPS) required for the operation of the system equipment. The UPS powers low voltage system equipment at the CCR and CCC equipment rooms. Once operational, the proposed Project would not require additional telecommunication infrastructure and no upgrades to off-site telecommunication facilities are anticipated. Any work that may affect services to the telecommunication lines would be coordinated with service providers. Therefore, this impact would be less than significant.

##### **Water and Wastewater**

Existing utility lines for water and sewer lines are located within the footprint of the proposed Project along Market Street, Manchester Boulevard, and Prairie Avenue. Project components including the MSF and stations would utilize these existing water and sewer lines as needed to connect for restrooms, water fountains and janitorial cleaning purposes.

The MSF would also provide for cleaning via an automatic washing of the vehicle exteriors at a Vehicle Wash Facility. The vehicle wash is typically a stationary system located in/near/adjacent to the MSF building where trains can be either manually or automatically moved through the wash facility. Assuming each car gets washed 1 time per week, it is estimated that on average, 230 gallons of water per day (gpd) will be used per day.<sup>85</sup> An on-site water recycling system will be used to collect and recycle water at the wash facility only (for estimation purposes, a recycling value of 80 percent is assumed); the amount of water recycling is determined by the ATS System operator and local requirements. Based on the 280 gpd and 80 percent recycling; the annual water usage for the ATS wash system is approximately 0.5 acre-feet

<sup>84</sup> Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021.

<sup>85</sup> Email correspondence with Iris Yuan, Lea+Elliott, June 29, 2020.

per year.<sup>86</sup> The ATS procurement documents will specify the amount to water recycling that is required. The MSF would connect to existing water and sewer lines located along Manchester Boulevard.

Other water demand requirements for the MSF would include restrooms, water fountains, showers, cleaning, etc. Water demand for the stations would include janitor's closets and water fountains. Water demand for the proposed Project is shown in **Table 4.14-10: Proposed Project Water Demand**. Based on the 75,000 square feet of the MSF, and approximately 9,200 SF for each of the three stations (for a total of 27,600 SF), the total water demand for the Project would be approximately 15.36 afy.

The existing commercial center on the site of the proposed MSF is currently served by existing utility lines. Existing water demand for the existing uses to be removed (see **Table 4.14-2**) is approximately 87.22 afy. The proposed Project (stations and MSF) would use approximately 71.86 afy less water than the current uses. Therefore, this impact would be less than significant.

**Table 4.14-10**  
**Proposed Project Water Demand**

Project Component	Square Footage	Demand Factor (gpd)	Water Demand (gpd)
Stations (3 total)	9,200 SF each 27,600 SF total	0.05	1,380
MSF	75,000 SF	0.05	4,200
MSF Train wash			230
Vons Replacement	46,400 SF	0.18	8,352
Total Daily Demand			13,712
Total Annual Demand			5,004,880 gal/yr. 15.36 afy

*Demand factor is based on LADWP demand factors for industrial uses of 0.05 gpd per SF. Stations and MSF use include restrooms, showers and water fountains and janitorial water use.*

### Electrical Power

In 2019, SCE was contacted to begin coordination related to the power demand requirements for the proposed Project (including the stations, MSF and ATS trains).<sup>87</sup> The following requirements and assumptions were given to SCE regarding the proposed Project:

<sup>86</sup> Annual water demand is calculated as 280 gpd reduced by 80 percent to account for recycled water. The result is 56 gpd of fresh water per day for 365 days, or approximately 20,440 gallons of water per year.

<sup>87</sup> Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021.

- The proposed Project would require approximately 10 MVA to power the system (trains, traction power, etc.) and infrastructure (station lighting and vertical circulation, guideway lighting, etc.)
- Fully redundant power feeds are requested; and
- Feeds to be provided at a single location; the proposed Project would distribute power as needed.

Using these assumptions, SCE completed a high-level Distribution Study to determine the amount of load that SCE could accommodate and required infrastructure upgrades in order to meet the proposed Project's recommended full redundancy design.<sup>88</sup> SCE's analysis assumed the use of the existing single (nonredundant) 16 kva circuit currently available along Market Street as it may be the most likely used circuit for the proposed Project.

The results of SCE's analysis found that:<sup>89</sup>

- The maximum load that can be accommodated at the present time is 10 MVA.
- To accommodate the 10 MVA load with full redundancy, the following upgrades would be required:
  - 1,500 feet of new civil work/duct banks,
  - 1,860 feet of new 1000 JCN cable,
  - 1,700 feet of upgrading/re-cabling the existing SCE primary cable to 1000 JCN, and
  - Two new gas switches.

Moreover, SCE estimated that normal operation of the proposed PDS substation at the MSF Site would have a peak power load flow of 2,008 kilowatts (kW) and normal operation of the proposed PDS substation at the Prairie Avenue/Hardy Street station would have an estimated peak power load flow of 2,119 kW for a total of 4,127 kW.

SCE would complete the aforementioned upgrades and would be subject to its procedures and requirements for construction and environmental clearance. Therefore, this impact would be less than significant. Although this impact is considered less than significant, **Mitigation Measure MM UT-2** is recommended to ensure that the proposed Project is re-evaluated by SCE so as to allow for final design.

### Stormwater

Existing storm drains are located within the alignment along Market Street, Manchester Boulevard, and Prairie Avenue. It is anticipated that the proposed Project would not interfere with these storm drains

<sup>88</sup> Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021.

<sup>89</sup> Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021.

during operation. Moreover, storm drains would be kept and maintained by the LACFCD and the City. Therefore, this impact would be less than significant.

#### **Natural Gas**

No new gas connections to serve the proposed Project elements would be required except at the proposed MSF. Natural gas would be used at the MSF to serve the pressure wash system, and for space and water heating. It is anticipated that the MSF would connect to existing gas infrastructure along Manchester Boulevard at the discretion of the SoCalGas. As further discussed in **Section 4.5**, the proposed Project would result in a net decrease in natural gas usage compared to the current uses. Therefore, this impact would be less than significant.

#### **Summary**

Based on current information and analysis by utility providers for operations, the proposed Project would have potential column conflicts with several existing utility lines along Market Street, Manchester Boulevard, and Prairie Avenue. As such, impacts would be potentially significant.

#### **Mitigation Measures**

The following mitigation measures have been identified to reduce potentially significant impacts.

#### **Construction**

**MM 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 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 proposed Project's 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.

#### **Operation**

**MM UT-2:** Prior to the award of the DBFOM contract, and start of construction, the City shall contact Southern California Edison (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 proposed Project's 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.

#### **Level of Significance After Mitigation**

#### **Construction**

With the implementation of **MM UT-1**, impacts related to the relocation or replacement of utilities would be less than significant.

#### **Operation**

Impacts would be less than significant.

Implementation of **MM UT-2** would ensure that the Project is re-evaluated by SCE so as to allow for final design.

#### **4.14.7 CUMULATIVE IMPACTS**

Implementation of the proposed Project including the related projects identified in **Section 4.0**, **4.0.6: Cumulative Assumptions**, would further increase demands for utilities and may require the construction or relocation of utility lines.

#### **Water**

As discussed previously, the City of Inglewood provides water to 86 percent of the residences and businesses in the City. Water is provided in the remaining areas by Golden State Water Company and Cal America Water.<sup>90</sup> There are approximately 74 related projects within the City of Inglewood that would be within the same service area as the Project. Development of the proposed Project and related projects could cumulatively increase demands on the existing water infrastructure system. However, each project will require a site-specific assessment to determine any impacts to existing water infrastructure. Specifically, all related projects would be required to assess impacts to existing water infrastructure and coordinate with the City prior to project approval. Moreover, utility upgrades would be determined and completed by the City and would be subject to its procedures and requirements for construction and environmental clearance. Additionally, under multiple dry year conditions, imported supplies can be purchased to meet an annual increase in demand. Additional water would be purchased through the City's Metropolitan member agency WBMWD. The purchase will draw primarily through two major water supply

<sup>90</sup> City of Inglewood. Water Works. <https://www.cityofinglewood.org/463/Water-Works>.

systems: the Colorado River Aqueduct and through the State Water Project.<sup>91,92</sup> The proposed Project (stations and MSF) would use approximately 71.86 afy less water than the current uses. Therefore, cumulative impacts related to water infrastructure would be less than significant.

### Wastewater

As discussed previously, the City's Public Works Department manages the City's sanitary sewer collection system. There are approximately 74 related projects within the City of Inglewood that would be within the same service area as the Project. Development of the proposed Project and related projects could cumulatively increase demands on the existing wastewater infrastructure system. However, each project will require a site-specific assessment to determine any impacts to existing wastewater infrastructure. Specifically, all related projects would be required to assess impacts to existing water infrastructure and coordinate with the City prior to project approval. Moreover, utility upgrades would be determined and completed by the City and would be subject to its procedures and requirements for construction and environmental clearance. Moreover, the proposed Project (stations and MSF) would use approximately 71.86 afy less water than the current uses. As such, the proposed Project would generate less wastewater than current uses. Therefore, cumulative impacts related to wastewater infrastructure would be less than significant.

### Stormwater

As discussed previously, the main storm drain lines within the area of the proposed Project are owned and maintained by the LACFCD and the City. There are approximately 394 related projects within the County of Los Angeles that would be within the same service area as the Project. Development of the proposed Project and related projects could cumulatively increase demands on the existing stormwater infrastructure system. However, each project will require a site-specific assessment to determine any impacts to existing stormwater infrastructure. Specifically, all related projects would be required to assess impacts to existing water infrastructure and coordinate with the LACFCD and the City prior to project approval. Moreover, utility upgrades would be determined and completed by the LACFCD and the City and would be subject to their procedures and requirements for construction and environmental clearance. Therefore, cumulative impacts related to stormwater infrastructure would be less than significant.

### Electric Power

As discussed previously, electricity within the City is supplied by SCE. There are approximately 304 related projects that would be within the same service area as the Project. Development of the proposed Project

<sup>91</sup> City of Inglewood Public Works. Urban Water Management Plan 2020. <https://www.cityofinglewood.org/DocumentCenter/View/16221/20210616-Public-Review-Draft-2020-UWMP>. Accessed September 15, 2021.

<sup>92</sup> Colorado River Aqueduct was constructed and operated by Metropolitan, which transports water from the Colorado River. The State Water Project is owned and operated by the Department of Water Resources, which transports water from the Sacramento-San Joaquin Delta through the California Aqueduct.

and related projects could cumulatively increase demands on the existing electrical infrastructure system. However, each project will require a site-specific assessment to determine any impacts to existing electrical infrastructure. Specifically, all related projects would be required to assess impacts to existing electrical infrastructure and coordinate with SCE prior to project approval. Similar to the Project, utility upgrades for the related projects would be determined and completed by SCE and would be subject to its procedures and requirements for construction and environmental clearance. Therefore, cumulative impacts related to electrical infrastructure would be less than significant.

### Natural Gas

As discussed previously, SoCalGas is the natural gas purveyor within the City. There are approximately 394 related projects that would be within the same service area as the Project. Development of the proposed Project and related projects could cumulatively increase demands on the existing natural gas infrastructure system. However, each project will require a site-specific assessment to determine any impacts to existing natural gas infrastructure. Specifically, all related projects would be required to assess impacts to existing natural gas infrastructure and coordinate with SoCalGas prior to project approval. Similar to the Project, utility upgrades for the related projects would be determined and completed by SoCalGas and would be subject to its procedures and requirements for construction and environmental clearance. Therefore, cumulative impacts related to natural gas infrastructure would be less than significant.

### Telecommunications

As discussed previously, the Telecommunications Division of the Information Technology and Communications Department is responsible for all of the voice-related services for the City. Moreover, Spectrum Business is the primary cable provider in the Project area. There are approximately 74 related projects within the City of Inglewood that would be within the Telecommunications Division service area. An additional 320 related projects would be within the Spectrum Business service area. Development of the proposed Project and related projects could cumulatively increase demands on the telecommunication systems. However, each project will require a site-specific assessment to determine any impacts to existing telecommunication infrastructure. Similar to the Project, utility upgrades for the related projects would be determined and completed by the appropriate utility service provider and would be subject to its procedures and requirements for construction and environmental clearance. Therefore, cumulative impacts related to telecommunication infrastructure would be less than significant.

## 4.14.8 CONSISTENCY WITH CITY OF INGLEWOOD GENERAL PLAN

The City's General Plan includes policies that relate to utilities including water production and wastewater and pertinent to utilities and service systems. These include:<sup>93</sup>

<sup>93</sup> *City of Inglewood General Plan, "Conservation Element" (1997).*

#### 4.14 Utilities and Service Systems

- Protect aquifers and water sources by preventing contamination of groundwater from surface contaminants and treating groundwater pumped from City wells to ensure the water meets safe drinking water standards.
- Reduce the ever-increasing demand being placed on the aquifers and on the Statewide water sources through cumulative conservation efforts, reuse of water, and using reclaimed water where potable water is not needed (namely, irrigation and landscaping).
- Maintain a water quality monitoring system to ensure continues compliance with State standards.

Further, the General Plan Conservation Element includes the following policies related to stormwater relevant to the proposed Project:

- Visit businesses to educate owners about stormwater regulations and the penalties for illegally dumping into storm drains.
- Require periodic sweeping to remove oil, grease, and debris from parking lots with 25 spaces or more.
- Increase the frequency of sampling storm drain pollution by County agencies to assess which measures are more successful.
- Continue to stencil warnings over individual storm drain openings that advise against discarding litter into the drains.

Additionally, the General Plan Conservation Element discusses ways to achieve solid waste conservation. These policies seek to ensure the City maintains a diversity of water sources to prevent over-reliance on aquifers and Statewide water sources, and to attain safe drinking water standards for water pumped from City wells, in part through monitoring, periodic maintenance measures, and public education efforts.

The proposed Project responds to the City's vision by incorporating a range of both mandatory and potential but feasibly-integrated sustainability measures (see **Section 3.0 Project Description, 3.5.9: Sustainability Features**) for the proposed Project related to the areas of energy efficiency and renewable energy, water efficiency and conservation, material conservation and resource efficiency, environmental quality, planning and integrated design, and site planning. These measures apply on a component-by-component basis for the guideway and stations, MSF, and PDS substations. Among the sustainability measures related to limiting water consumption and preventing wastewater generation are mandatory efforts to filter and reuse wash/rinse water from the ATS train wash, xeriscape landscaping, weather-based irrigation control, low flow faucets and fixtures, and using best available water efficiency technologies for cooling towers, among others.

Given that the proposed Project includes the aforementioned features and components, it is consistent with the policies of the General Plan.

## 5.0 ALTERNATIVES

### 5.1 INTRODUCTION

The California Environmental Quality Act (CEQA) Guidelines require an Environmental Impact Report (EIR) to include a discussion of a reasonable range of alternatives to a project that would "feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the proposed Project and evaluate the comparative merits of the alternatives" (State CEQA Guidelines Section 15126.6). An EIR is not required to consider every conceivable alternative to a proposed project. Rather, a reasonable range of potentially feasible alternatives needs to be considered that will foster informed decision-making and public participation.

Key provisions of the State CEQA Guidelines on alternatives (Section 15126.6(b) through (f)) are excerpted below to explain the foundation and legal requirements for the analysis of alternatives in this Recirculated Draft EIR.

- *[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the proposed objectives or would be more costly. (15126.6(b))*
- *The specific alternative of "no project" shall also be evaluated along with its impact. (15126.6(e)(1))*
- *The "no project" analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. (15126.6(e)(2))*
- *The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. (15126.6(f))*
- *Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). (15126.6(f)(1))*

- [For alternative locations,] only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR. (15126.6(f)(2)(A))
- If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location. (15126.6(f)(2)(B))
- An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. (15126.6(f)(3)).

**5.2 SIGNIFICANT IMPACTS OF THE INGLEWOOD TRANSIT CONNECTOR PROJECT**

In accordance with Section 15126.6(b) of the State CEQA Guidelines, the alternatives in this section have been selected to evaluate means for avoiding or substantially reducing the significant impacts of the proposed Inglewood Transit Connector Project (proposed Project or ITC Project) identified in **Section 4.0: Environmental Impact Analysis** of this Recirculated Draft EIR.

**Table 5.0-1: Environmental Impact Summary** presents a summary of findings for each topic analyzed in this EIR for the proposed Project. As shown, impacts related to biological resources, hazards and hazardous materials, hydrology and water quality, noise and vibration, tribal cultural resources, and utilities and service systems were determined to have significant impacts prior to mitigation.

**Table 5.0-1  
Environmental Impact Summary**

Topic	Significant Impact?	Mitigated to Less than Significant?	Unavoidable Significant Impact?
Aesthetics	No	No	No
Air Quality	Yes	Yes	No
Biological Resources	Yes	Yes	No
Cultural Resources	No	No	No
Energy Resources	No	N/A	No
Geology and Soils	Yes	Yes	No
Greenhouse Gas Emissions	No	N/A	No
Hazards and Hazardous Materials	No	N/A	No
Land Use and Planning	No	N/A	No
Noise and Vibration	No	Yes	No
Population, Employment and Housing	No	N/A	No
Transportation	No	N/A	No
Tribal Cultural Resources	Yes	Yes	No
Utilities and Service Systems	Yes	Yes	No

Measures are identified to mitigate Project impacts to less than significant, with the exception of short term air emissions during construction of the Project.

**5.3 PROJECT OBJECTIVES**

As identified in the State CEQA Guidelines, the achievement of Project objectives was considered in determining potentially feasible alternatives that would avoid or substantially lessen any significant effects of the proposed Project.

The City’s goals and objectives for the Inglewood Transit Connector Project are as follows:

- Provide direct and convenient connection to the Metro regional transit system for local residents and the region to access the City’s new major employment, commercial, and activity centers;
- Close the “last mile gap” to the regional transit system by providing passengers with the ability to transfer to or from destinations and the Metro K Line;
- Provide sufficient transit connection capacity between the Metro regional transit system and the City’s new major activity centers with enhanced travel time certainty and sufficient capacity to meet peak ridership demands to encourage transit as a travel mode choice;
- Maintain existing roadway capacity;
- Reduce the City’s traffic congestion and alleviate growing demand on the existing roadway network on both major arterials and residential streets for both nonevent and event days;
- Encourage intermodal transportation systems by providing convenient, reliable time-certain transit;
- Increase transit mode split, reduce vehicle trips, and reduce per-capita vehicle miles traveled to the City’s major activity centers, with corresponding improvement in air quality, public health, and reductions in greenhouse gas emissions from transportation sources in accordance with the City’s goals, the SCAG 2020-2045 RTP/SCS, and State policies with respect to climate change and land use;
- Support the ongoing economic revitalization, including through the creation of public parking facilities;
- Encourage redevelopment and investment within the City in areas served by the proposed Project;
- Provide safe, reliable, and convenient access to businesses in the City so that they are accessible to their workforce and customers;
- Connect the Inglewood community and citizens to jobs, education, services, and destinations within the City and within the region by providing transit within safe and accessible walking distances; and
- Support regional efforts to become more efficient, economically strong, equitable, and sustainable.

## 5.4 ALTERNATIVES

Alternatives presented in this section consist of potential alternatives that were initially considered but screened-out from further consideration due to their infeasibility or inability to meet the basic objectives of the Project, and design alternatives/ variations selected for further evaluation. As required by CEQA, the No Project alternative is also addressed in this section.

### 5.4.1 Alternatives Eliminated from Further Consideration

This section describes preliminary alternatives to the proposed Project initially considered early in the planning process for the ITC Project and the reasons why these alternatives are not evaluated further in this EIR.

#### *Alternative Alignments*

As part of the Envision Inglewood planning study,<sup>1</sup> the City evaluated several independent last-mile, fixed-guideway transit connector options in the Locally Preferred Alternative (LPA) Report,<sup>2</sup> comparing these options against key screening criteria and evaluating each option against the City's stated goals and objectives. The LPA Report evaluated the following four conceptual transit alternatives, all consisting of an elevated Automated Transit System (ATS):

- Alternative A: Market-Manchester Street Alignment (proposed Project)
- Alternative B: Fairview Heights Alignment
- Alternative C: Arbor Vitae Alignment
- Alternative D: Century Blvd Alignment

Alternative A was selected based on the review of these alternatives as the proposed Project.

As described in detail below, Alternatives B, C, and D were eliminated from further consideration.

#### **Alternative B: Fairview Heights Alignment**

The City identified an independent elevated ATS alternative connecting directly to the Fairview Heights Metro K (Crenshaw/LAX) Line station along Prairie Avenue as shown in **Figure 5.0-1: Location of Alternative Alignments in the LPA Report**. The Fairview Heights Alignment (Alternative B) would be an aerial alignment running approximately one-half mile along Florence Avenue between Prairie Avenue and

<sup>1</sup> City of Inglewood, *Envision Inglewood: Connecting People, Places, and the Future (May 2018)*, accessed March 2019, <http://envisioninglewood.org/>.

<sup>2</sup> City of Inglewood, *Envision Inglewood: Locally Preferred Alternative Report (June 2018)*, accessed March 2019, <http://envisioninglewood.org/wp-content/uploads/2018/07/Envision-Inglewood-Locally-Preferred-Alternative-Report.pdf>.

West Boulevard, transitioning south and then running along Prairie Avenue for approximately 1.75 miles between Florence Avenue to Century Boulevard for a total length of approximately 2.2 miles providing service to the Forum, the Los Angeles Sports and Entertainment District (LASED), and the Inglewood Basketball and Entertainment Center (IBEC).

This alternative would be dual lane and include four stations. The station locations were identified based on connections to traffic generators/development. This alternative includes potential intermodal center locations to capture road-based traffic, such as buses, transportation network companies (TNCs), taxis, and private vehicles, and facilitate a convenient transfer to the ITC. These potential intermodal centers would provide an opportunity to limit the amount and type of road-based traffic into the area, especially during special events.

As outlined in the LPA Report, this alternative was eliminated from further consideration for a variety of reasons including conflicts with, and impacts to, a variety of utility facilities. Based on preliminary research, utilities as well as lateral connections to these pipes from adjacent properties were identified along Florence Avenue. These existing utilities include sewer, gas, and water mains along these streets, which would pose obstacles for placement of guideway columns. In addition, various utility crossings at the curve alignment transition at Florence Avenue and Prairie Avenue would need to be avoided. While Alternative B would be located primarily within the street right-of-way, limited roadway width exists on Prairie Avenue between Florence Avenue and Manchester Boulevard to accommodate the elevated ATS structure. Potentially significant property impacts to the Inglewood Cemetery are anticipated because the alignment transitions from Florence Avenue, which has a wide right-of-way of 125 feet, to Prairie Avenue, which has a right-of-way of 78 feet. Furthermore, the right-of-way on Prairie Avenue decreases to less than 70 feet south of Regent Street. This would potentially further impact the Inglewood Cemetery and potentially conflict with utility infrastructure.

#### **Alternative C: Arbor Vitae Alignment**

The Arbor Vitae Alignment (Alternative C) concept would be an aerial alignment running approximately 2 miles along Arbor Vitae Street from Aviation Boulevard to Prairie Avenue, where it transitions north to the Forum, and south along Prairie Avenue for approximately one-half mile to Century Boulevard as shown in

**Figure 5.0-1.** This alignment would provide service to the Forum, LASED and SoFi Stadium and the IBEC. Additionally, Alternative C presents the opportunity to directly connect to the Los Angeles International Airport (LAX) and its Landside Access Modernization Program (LAMP), which includes parking opportunities; a consolidated rental car center; and a planned regional multimodal hub served by Metro's K and C (Green) Lines, various Metro, and municipal bus lines, and the LAX ATS. Although this alternative

5.0 Alternatives

connects to a planned multimodal hub, it would not provide development opportunities are limited in the downtown/commercial district of Inglewood because it will not serve the area.

As with other alternatives, Alternative C also provides opportunities for possible intermodal center locations to capture road-based traffic, such as buses, TNCs, taxis, and private vehicles, and to facilitate a convenient transfer to the ITC.

As outlined in the LPA Report, this alternative was eliminated from further consideration for the following reasons:

- Crossing over and under the I-405 would require coordination with the California Department of Transportation, Los Angeles Department of Transportation, and Los Angeles World Airports. This alignment does not present the opportunity for integration with local economic activity, current and future transit-oriented development, and other initiatives in the downtown/commercial district of Inglewood.
- The right-of-way along Arbor Vitae ranges from 100 feet to 66 feet, with a narrowing of the right-of-way east of Eucalyptus Avenue. Given the narrow right-of-way, this concept would potentially require acquisition of existing small business and possibly cause residential displacement. While the proposed Project would require some small business acquisition, the scale of the acquisition for this alternative, and its impact to residential properties, would be more extensive.
- Alternative C may potentially have adverse economic and fiscal impacts to local businesses along Arbor Vitae Street due to potentially reduced visibility, potential loss of on-street parking during construction, and potential permanent removal of on-street parking spaces to accommodate the alignment. The narrow width of the right-of-way would further reduce visibility of with project implementation as compared to the proposed alignment. Additionally, while the proposed Project is anticipated to remove some on-street parking spaces as well, the narrow right-of-way of this alternative is anticipated to impact existing on-street parking more extensively.
- Substantial utility lines were identified as part of preliminary research for this alignment alternative in addition to overlapping footprints with the selected alignment, including an 8- to 10-inch sewer pipe along the centerline of Arbor Vitae Street between Eucalyptus Avenue and La Brea Avenue. Therefore, impacts to utilities would be more significant than the proposed alignment.
- Together, these utilities pose significant obstacles as they may require either realignment of the ATS guideway or utility relocation would not be considered infeasible at this stage. Underground electrical lines, including vaults, are primarily concentrated along or adjacent to sidewalks and do not pose a major impediment. Nongravity-flow utilities, including water service lines, may be required to be relocated.



SOURCE: City of Inglewood - 2018; Meridian Consultants - 2019

FIGURE 5.0-1

Location of Alternative Alignments in the LPA Report



### Alternative D: Century Boulevard Alignment

The Century Boulevard Alignment (Alternative D) would be an aerial alignment running for approximately two miles along Century Boulevard from Aviation Boulevard to Prairie Avenue, where it transitions north along Prairie Avenue for approximately 1 mile to south of Manchester Boulevard (see **Figure 5.0-1**). This alternative would provide service to the Forum, LASED, and IBEC. Alternative D provides the opportunity to directly connect to a regional multimodal hub served by Metro's K and C Lines, various Metro, and municipal bus lines, and the LAX ATS system.

As with other alternatives, Alignment D also provides opportunities for possible intermodal center locations to capture road-based traffic, such as buses, TNCs, taxis, and private vehicles, and to facilitate a convenient transfer to the ITC.

As outlined in the LPA Report, this alternative was eliminated from further consideration for the following reasons:

- To connect to the multimodal hub, Alternative D would be required to cross the I-405 on the south side of the new consolidated rental car facility under development west of the I-405 Freeway and north of Century Boulevard as part of the LAX Landside Access Modernization. The transition from an elevated segment to below grade under the I-405 or above-grade over the I-405 would not be feasible due to the short distance available and the real estate constraints between Century Boulevard and the LAX Manchester Square development. Additionally, a bridge crossing over I-405 onto Century Boulevard would impede over or under clearance.
- Crossing over and under the I-405 would require coordination with the California Department of Transportation, Los Angeles Department of Transportation, and Los Angeles World Airports. This alignment does not present the opportunity for integration with local economic activity, current and future transit-oriented development, and other initiatives in the downtown/ commercial district of Inglewood.

### ATS At-Grade Alignment

An at-grade transit system along Market Street was initially considered but determined to be infeasible because it would result in significant traffic impacts, would not have the capacity to meet peak ridership demands, and would be more costly to build and/or operate than the proposed Project. The at-grade system presented many engineering challenges. An at-grade transit system was considered from Florence with a trench into a tunnel at Manchester Blvd to avoid traffic impact intersections. The 700-1,000 feet transition trench from at-grade to a tunnel would bifurcate Market Street with 20-25 feet track level change, and the direct transition from grade to an elevated guideway was deemed infeasible given the minimum ramp length required 700-1,000 feet (not including transitions).

East/west traffic from Manchester Boulevard to the 405 freeway would be significantly impacted by an at-grade system. Congestion during peak periods could create conflicts with an at-grade, fixed-guideway transit service, which would degrade transit service. Controlled crossings would be required for pedestrians across the at-grade line. An at-grade system would also bifurcate Market Street from just south of Regent Street to Manchester Avenue, creating a long guideway trench and physical barrier in downtown Inglewood since the structure of the tracks would physically disconnect existing connections between different parts of a community. To avoid these impacts, a tunnel would be needed to allow Manchester Boulevard to cross under the at-grade guideway. Construction of this tunnel would increase the construction cost for this alternative and also result in indirect land use impacts to the character of Market Street, particularly to the southern portion of Market Street in downtown. Tunneling may also adversely impact existing faults in and around the City.

An at-grade system would require a 3-car train at least 210 to 270 feet long. The capacity of this train would require headways during events that could not be achieved. Due to this constraint, this system could not meet peak capacity demands. A Driver/Operator would also be required for an at-grade system, which would further add to the cost to operate the system.

### Interlined Operability (Subway) Scenario

An Interlined Operability Scenario was also initially studied by LA Metro and the City of Inglewood and determined to be infeasible due to the cost and complexity of this type of system and extension of the Metro K Line. The scenario studied included a connection from the K Line in a subway under Prairie Avenue, which also would jointly operate on a portion of the K Line.

Existing and proposed operations on the Metro K and C (Green) Lines constrain the modification or expansion of service required to allow an interlined system. The K Line is designed to support up to 5-minute minimum headways. This maximizes the service potential for these lines but does not allow for additional capacity to serve a new branch for the Project. For this reason, Metro concluded that any scenario involving integration with the K Line or the C Line would require upgrades to the entire Metro system to accommodate increased train frequency. City's activity centers at the Forum and LASED area; and was ultimately determined to be infeasible.

### Alternative Technologies

The City evaluated a range of driverless transit technologies to determine the viable classes of technologies that could potentially meet the anticipated requirements for the ITC, as outlined in the LPA Report.<sup>3</sup> These requirements include the ability to meet projected ridership demand in terms of peak

3 City of Inglewood, *Envision Inglewood: Locally Preferred Alternative Report*.

hour demand or line capacity. The projected ridership demands vary between 500 passengers per hour per direction (pphd) during the weekday commute hours to approximately 9,000-10,000 pphpd during special events.

Only driverless technologies were analyzed because their shorter (more frequent) headways are more likely to meet the anticipated line capacity demands, as well as fit within the geometric constraints given the short system route and the high peak ridership demands from special events and game days at the key ridership generators. The range of such technologies are considered to be a class of Automated Guideway Transit or ATS Systems. Differentiation is primarily based on the size of the vehicles, guideway mounting, and propulsion and guidance systems.

The Project's transit technology is a form of light rail technology that can be steel-wheel/steel rail, rubber tired or magnetically levitated, supported on dual rails (that may be steel rail or concrete plinths) or straddling or suspended from a single beam/rail such as in a monorail type technology that will operate within a dedicated trainway. Power distribution will be through a third rail instead of overhead catenary to avoid additional visual impacts due to the overhead catenary system wires and support structures. It will be fully automated (i.e., driverless) which is necessary to operate at the tight headways to meet the projected ridership needs. The vehicles are smaller than traditional heavy rail technology so as to successfully maneuver the tight 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 driverless technologies considered were evaluated against the following criteria to provide a preliminary assessment of viable systems suitable for further evaluation and consideration:

- Ability to fit within the site-specific constraints;
- Ability to meet anticipated ridership demand in terms of peak-hour demand or line capacity;
- Flexibility of operations in terms of different train lengths, which would be longer during peak periods and shorter during off-peak periods to maintain the appropriate frequency and service levels.
- Ability to expand the fleet size with minimal or no disruption to ongoing normal passenger service during peak operational hours;
- Technical ability to meet the intended purpose; and
- Viability/availability of technology suppliers as measured by (1) longevity of business providing new systems and continued operations and maintenance; (2) at least one technology application proven in passenger service; and (3) applications of comparable size/scale to the proposed ITC Project.

As discussed in the LPA Report and summarized below, transit technologies ruled out from further consideration included Personal Rapid Transit (PRT) and Small Monorail ATSS.

#### Personal Rapid Transit (PRT)

PRT systems are designed to provide nonstop, origin-to-destination service to individuals or small groups of passengers via multiple cars operating in a network. Vehicles are typically 10 to 15 feet long, include a four- to six-passenger seated capacity, and have low headroom. PRT systems operate at low speeds (less than 25 miles per hour [mph]) and, to date, network size has been very limited.

To accommodate such a high-vehicle volume that would be necessary for anticipated ridership of the proposed Project, the infrastructure at the stations and bypass lanes would be substantially larger than for larger vehicle ATS systems. For these reasons, this alternative technology was eliminated from further consideration.

The City's Downtown TOD Plan envisioned an aerial personal rapid transit system, noted as SKY Tran, and stated that it could travel at-grade and at slow speeds along Market Street, could detach from guideway and run on wheels on the ground, and then system could then travel above-grade or in a dedicated lane on Manchester Blvd and through the Forum and Hollywood Park parking lots. The system could then return to a low-speed, at-grade alignment through the commercial areas of Hollywood Park. Finally, the system could continue in an aerial alignment east along Century Boulevard, serving the shopping centers there, and south along Crenshaw Boulevard to the Metro Green Line Crenshaw station. Additionally, the Downtown TOD Plan noted that a potential route would be along La Brea Avenue instead of Market Street and had a capacity of 12,000 persons per hour per direction and could cost up to \$10 million per mile.

The SKY Tran is a suspended system that uses small pods suspended from a monorail. While there are some agreements for future installations, SKY Tran does have an operational system either in the US or abroad at this time. Additionally, it is not proven that Sky Tran's capability has the capacity to carry 12,000 pphpd and the dual-mode (suspended and street modes) operations. Additionally, SKY Tran's current design does not meet the American Society of Civil Engineers' ATS standards and does not have any provisions for emergency evacuation from the pods, as is recommended by the National Fire Protection Association. While not the SKY Tran is not precluded from future procurement, all technology providers must demonstrate compliance with technical specifications, proven track record and demonstrate is capable of carrying about 500 pphpd to 9,000 pphpd.

It should be noted that in the last decade other innovative technologies such as autonomous vehicles (AVs) have proposed very high frequency operations, but they have not been able to meet the anticipated timeline of development and the projected performance. AVs are currently in pilot projects and have been

able to demonstrate very limited operations and very low capacities (about 300- 500 pphpd). These pilot AV systems run on simple dedicated routes outside public roads and typically have speeds limited to 15 mph. For these reasons, this alternative technology was eliminated from further consideration.

#### Small Monorail

Small monorail technology provides line-haul-type service connecting multiple stations. These systems may be operated as a shuttle or pinched loop, with multiple trains following each other and stopping at every station before turning back at the end of the line. Small monorail systems are applied in geographically compact areas and may either operate on top of the guideway or be suspended from the guideway. Vehicles on these systems are typically 15 to 20 feet long and include capacity for 12 to 20 passengers, with operating speeds ranging from 20 to 30 mph.

As determined in the LPA Report, small monorail systems would not be able to meet peak-hour ridership demand and are not a sufficiently flexible length for train operation; thus, such a system would provide adequate capacity. For these reasons, this alternative technology was eliminated from further consideration.

#### **Maintenance and Storage Facility (MSF) Relocation Alternative**

The Maintenance and Storage Facility (MSF) Relocation Alternative was initially considered but not carried forward for further analysis because it would not avoid or substantially lessen any of the significant impacts identified for the proposed Project.

With this alternative, the MSF and power distribution system (PDS) substations would be located on the 9-acre site at 250 N. Market Street adjacent to the proposed Market Street/Florence Avenue station rather than at the 5.5-acre site at 500 E. Manchester Boulevard. All other Project components would remain the same.

Under the proposed Project, the site at 500 E. Manchester Boulevard would be partially acquired and the existing commercial building containing the Vons grocery store and other businesses and site improvements would be demolished to accommodate the MSF and PDS substations (with the Vons to be rebuilt at the corner of Manchester Boulevard and Hillcrest Boulevard). Under the MSF Relocation Alternative, the partial property acquisition at 500 E. Manchester Boulevard would not be required. This would avoid the temporary construction impacts associated with these demolition activities and the construction of the MFS and PDS substations at this location. However, demolition of the commercial buildings and site improvements would occur at 250 N. Market Street and the new MSF and PDS substation would be built on this property. As a result, the temporary construction impacts resulting from demolition activities and construction of the MSF and PDS substation would not be avoided or substantially lessened

but would occur at the property as 250 N. Market Street. Additionally, the MSF and PDS substation would reduce the proposed public parking in the Market Street area that is designed to support ridership and access to the ITC Project and the downtown Market Street area.

#### 5.4.2 Alternatives Considered

Alternatives carried forward for further consideration include the following:

- Alternative 1: No Project
- Alternative 2: Bus Rapid Transit (BRT) System
- Alternative 3: Market Street Pedestrian Promenade
- Alternative 4: 4th Station Alternative
- Alternative 5: Prairie Avenue Single Station Alternative
- Alternative 6: Maintenance and Storage Facility (MSF) Site Alternative

##### 5.4.2.1 Alternative 1: No Project

The No Project Alternative considers conditions if the proposed Project is not built. No new transportation infrastructure would be built within the Project study area, aside from transportation projects that are currently under construction or funded for construction and operation by 2027. These projects include transit projects funded by Measure R, Measure M, and specified in the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Existing infrastructure and future planned and funded projects assumed under the No Project alternative include:

- Metro K Line –Currently under construction (2021), operating start date (Fall 2022)
- Implementation of the Citywide Event Transportation Management and Operations Plan
- Street improvements being constructed as part of the Los Angeles International Airport Landside Access Modernization Program and the Inglewood Basketball and Entertainment Center (IBEC) projects.
- Existing Bus Service – Metro Rapid and Metro Local

Existing public transit and private transportation operators would continue to provide service. Public transit operators would likely increase service in response to the projected growth in the number of visitors and residents that would occur as result of new and proposed major activity centers being developed in the City in the Downtown and Hollywood Park areas.

The LASED at Hollywood Park includes SoFi Stadium and additional development allowed by the Hollywood Park Specific Plan. Higher density mixed-use development is also planned in the vicinity of the

Metro Downtown Inglewood station near Florence Avenue and Market Street being developed within the Crenshaw/Imperial TOD Plan Area. These projects and improvements would reasonably be expected to occur in the foreseeable future if the proposed Project were not approved based on current plans.

Throughout 2020, the City of Inglewood developed a Citywide Transportation Management and Operations Plan (TMOP) focused on addressing future traffic demands that may result from events at the stadium. The Inglewood TMOP establishes a plan that provides public information, reduces unwarranted traffic through adjacent neighborhoods, and promotes the use of alternative modes of transportation as described below.

#### **City of Inglewood Event Park and Ride Shuttle Program and Intermodal Transit Facility at Hollywood Park**

To address the limited pre-sold on-site parking available at SoFi Stadium, the City has established a remote parking and shuttle program, known as the I Park & Go Program, that considers comprehensive access, circulation and traffic management for residents, visitors, and businesses on NFL game days and during large special events.

Given the growing event-day demand of the City's I Park & Go Program, the City would not only continue the use at the ITF Lot but also utilize the vacant lot at the southwest corner of Prairie Avenue and Manchester Boulevard given the limited capacity for increased shuttles at the City's ITF Lot.

#### **Event Transit Service**

The City has established a partnership and received support from Metro, Big Blue Bus (Santa Monica), GTrans (Gardena), and Torrance Transit to expand transit service. Under the No Project alternative, the City would 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 by 2021, if possible. The TMOP addresses both Pre-Event and Post-Event conditions associated with SoFi Stadium at Hollywood Park. The Pre-Event scenario includes bus routes along Pincay Drive, Kareem Court, and Century Boulevard. The Post-Event scenario includes bus routes along Prairie Avenue, Manchester Avenue, Crenshaw Boulevard, Pincay Drive, Kareem Court, and Century Boulevard.

#### **5.4.2.2 Alternative 2: Bus Rapid Transit (BRT) System**

Bus rapid transit (BRT) is a public transit system designed to provide improved capacity and reliability relative to a conventional bus system. Typically, a BRT system includes roadway lanes that are dedicated to buses, with signal priority to buses at intersections where buses may interact with other traffic, with

enhanced coordinated flow. BRT systems typically include design features to optimize passenger boarding and alighting activities, as well as ticket purchases. A BRT corridor is a section of roadway or contiguous roadways served by the uniquely-branded buses along routes with a minimum length of approximately 1.5 to 2 miles.

Under this alternative, the City would construct and operate a BRT system that would connect the Forum, the SoFi Stadium, the Performance Arena, the IBEC and the Hollywood Park mixed uses to the Metro K Line Downtown Inglewood station. The proposed route of this alternative would be a loop route starting along Florence Avenue to travel east to North Prairie Avenue where it would turn south along Prairie Avenue to the Inglewood Transit Center Facility at Prairie Avenue and Arbor Vitae adjacent to the Hollywood Park site, and then return via Prairie Avenue northbound to travel westbound along Manchester Boulevard to Market Street to traverse northbound to Florence Avenue. The BRT would be located entirely within the public right-of-way. This route is generally consistent with the route as described in the City's New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines.<sup>4</sup>

Along the alignment, one eastbound travel lane along Florence Avenue between Market Street and Prairie Avenue; one southbound travel lane along Prairie Avenue between Florence Avenue and Manchester Boulevard; two lanes (one lane in each direction) along Prairie Avenue between Manchester Boulevard and the Inglewood Transit Center Facility; one westbound travel lane along Manchester Boulevard between Prairie Avenue and Market Street; and one northbound lane along Market Street between Manchester Boulevard and Florence Avenue would all be converted (from the existing mixed flow traffic lanes) to provide the Bus-only lane to accommodate the BRT alternative thereby reducing roadway lane capacities for mixed-flow traffic.

BRT systems typically include the following features:

- Dedicated lanes and alignment:
  - Separate lanes to avoid congested roadways.
  - Dedicated bus-only lanes for faster travel and ensure that buses are not delayed by mixed traffic congestion. Separate rights of way may be used. Transit malls or 'bus streets' may also be created in city centers.

<sup>4</sup> City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, November 1, 2016

- Off-board fare collection
  - Fare prepayment at the station, instead of on board the bus, eliminates the delay caused by passengers paying on board.
- Intersection treatment
  - Prohibit turns for mixed-flow traffic across the bus lane to reduce delays to the buses, in most cases. Transit Bus priority will often be provided at signalized intersections (using Transit Priority System (TPS) modules at all upgraded signal controllers at intersections along the alignment) to coordinate them to reduce delays by extending the green phase or reducing the red phase in the required direction compared to the normal sequence. Potential additional communication equipment to transmit and receive signals between the intersections and the City's Transportation Management Center may also be provided, as part of this alternative. Equipment to track the locations of the buses and closed-circuit television cameras may also be required / provided at the intersections along the alignment to provide the required monitoring.
- Platform-level boarding
  - Station platforms/stops would be convenient for quick and easy boarding, making them fully accessible for wheelchairs and baby strollers, with minimal delays.

Passenger loading areas would include stops at the following locations:

- Market Street/Florence Avenue in close proximity to the Metro K Line Downtown Inglewood Station. This BRT stop would provide connections to and from the regional light rail system;
- The Forum on Prairie Avenue;
- The City's Intermodal Transit Facility at Hollywood Park providing access to the SoFi Stadium, Hollywood Park Development Site, and IBEC.

High-capacity bus vehicles such as articulated buses may be used; these may have multiple doors for fast entry and exit. To reduce greenhouse gas emissions, vehicles may be electric or alternative fuel technology.

Under the BRT alternative, the proposed Project would not be built and none of the transit infrastructure, street provisions and activities would occur.

#### **5.4.2.3 Alternative 3: Market Street Pedestrian Promenade**

Under the Market Street Pedestrian Promenade Alternative, the proposed Project and all of its components would be constructed and would operate. With this alternative, Market Street between Florence Avenue and Manchester Boulevard would be entirely closed to vehicular traffic as shown in **Figure 5.0-2: Alternative 3: Market Street Pedestrian Promenade**. Regent and Queen streets would have barricades to prevent traffic turning onto Market Street in both directions. East-west traffic along Regent Street and Queen Street would be allowed without being able to turn on to Market Street. Traffic would

be diverted to surrounding streets including La Brea Avenue and Locust Street. The establishment of this pedestrian promenade would encourage pedestrian activity by improving walkability within Downtown Inglewood.

#### **5.4.2.4 Alternative 4: 4<sup>th</sup> Station Alternative**

This alternative considers the addition of a fourth station to the ATS as proposed at Manchester Boulevard, east of the Market Street/Manchester Boulevard intersection as shown in **Figure 5.0-3: Alternative 4: 4<sup>th</sup> Station Alternative – Manchester Boulevard Station**.

The station configuration would consist of a center platform with vertical circulation to an elevated passenger walkway located under the station platform level. Passengers would have access to the station through an elevated passenger walkway. As with the other ITC stations, this additional station would consist of a center platform configuration with the platform located at level 3 (approximately 50 feet above the existing grade). Passengers would access the platform from a mezzanine (at level 2) connected by elevated passenger walkways to vertical circulation elements to provide access to the sidewalk (at level 1) on the north side of Manchester Boulevard. Providing this additional station in Downtown would:

1. Support ongoing economic revitalization in Downtown Inglewood;
2. Provide a direct connection from Downtown Inglewood to the regional rail system, the Forum, the LASED, including SoFi Stadium, and the IBEC; and
3. Enhance the connection of Inglewood and residents to jobs, education, services, and destinations within the City and within the region; and support regional efforts to become more efficient, economically strong, equitable, and sustainable.

#### **5.4.2.5 Alternative 5: Prairie Avenue Single Station Alternative**

The proposed Project modifies and relocates Prairie Avenue to the east to maintain the current roadway capacity. The relocation of Prairie Avenue and the need for a passenger station connection on the sidewalk/ground level affects properties located east of Prairie Avenue. This Alternative avoids affecting these properties by consolidating the two proposed stations on Prairie Avenue into a single station that would be located adjacent to the City's Intermodal Transit Facility at the City's Civic Center site. Passengers would connect to the ground/sidewalk level within the City-owned Civic Center site. **Figure 5.0-4: Alternative 5: Prairie Avenue Single Station Alternative** illustrates this alternative.

This Alternative maintains Prairie Avenue within its existing right-of-way; however, one to two lanes would be lost, thereby reducing the capacity of the roadway. Specifically, one travel lane in each direction along Prairie Avenue between Arbor Vitae and La Palma, one lane in the southbound direction between

5.0 Alternatives

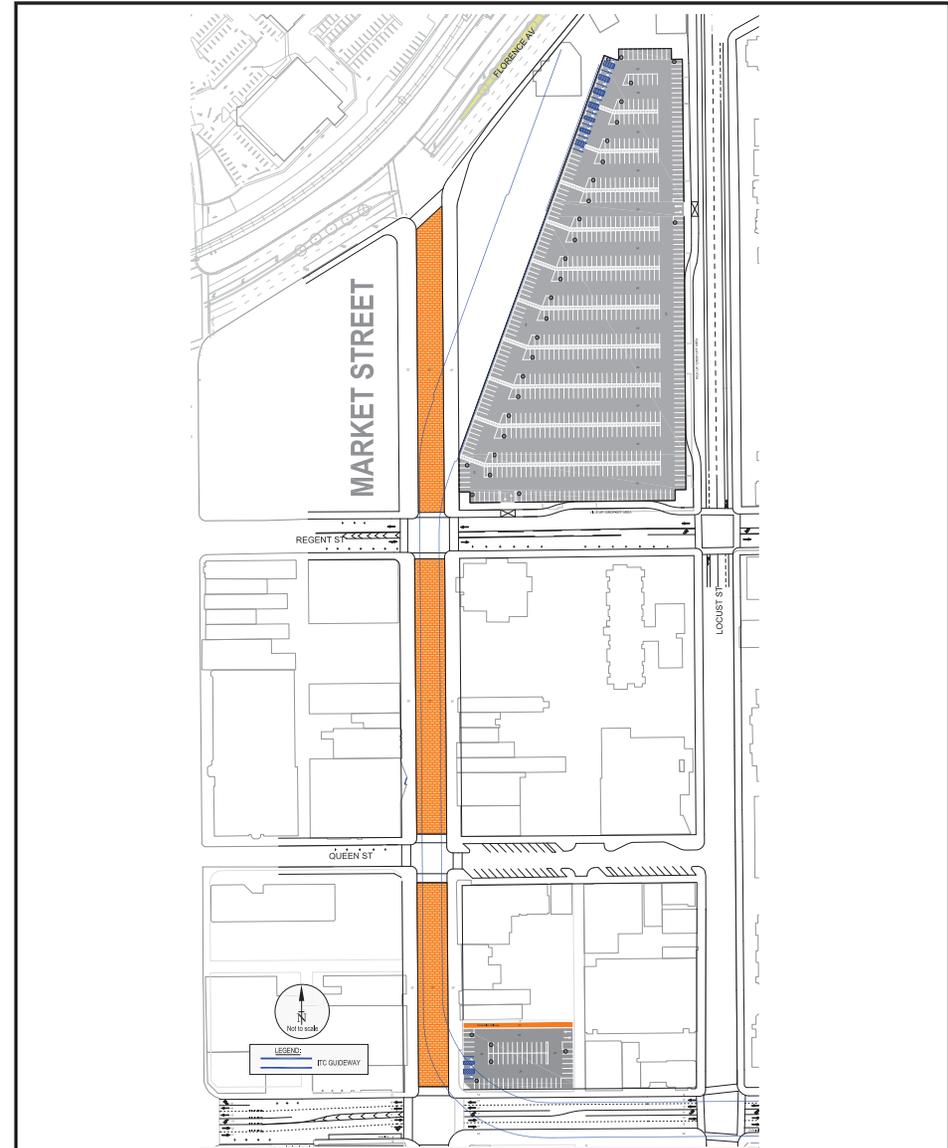
La Palma and Pincay Drive, and one lane in each direction between Pincay Drive and Manchester Boulevard would be lost under this Alternative 5: Prairie Avenue Single Station Alternative.

**5.4.2.6 Alternative 6: Maintenance and Storage Facility (MSF) Site Alternative**

The proposed Project involves siting the MSF within the southeastern portion of the site at 500 E. Manchester Boulevard closest to the corner of Nutwood Street and Spruce Avenue that contains a Vons grocery store and gas station, with other businesses, including a private gym, bank branch and coffee shop located in the building with Vons. This siting of the MSF requires removal of the gas station currently located on the Vons site in order to provide for short-term construction staging to construct the MSF and, thereafter, to provide parking.

This Alternative moves the MSF to the northwestern portion of this property closest to the south corner of Hillcrest Boulevard and Manchester Boulevard as shown in **Figure 5.0-5: Alternative 6: Maintenance and Storage Facility Alternative**. The site containing the MSF would be approximately 14,000 SF in size.

This alternative would have the same elevated profile and footprint of the MSF and its supporting facilities (e.g., access, circulation, employee parking, etc.). With this alternative, the existing gas station would remain on the site. Under this Alternative, the building containing the grocery store and other businesses would be demolished. With the Project, a replacement Vons store would be built on the corner of Manchester Boulevard and Hillcrest Boulevard. With this alternative a replacement Vons store would not be built on this site.

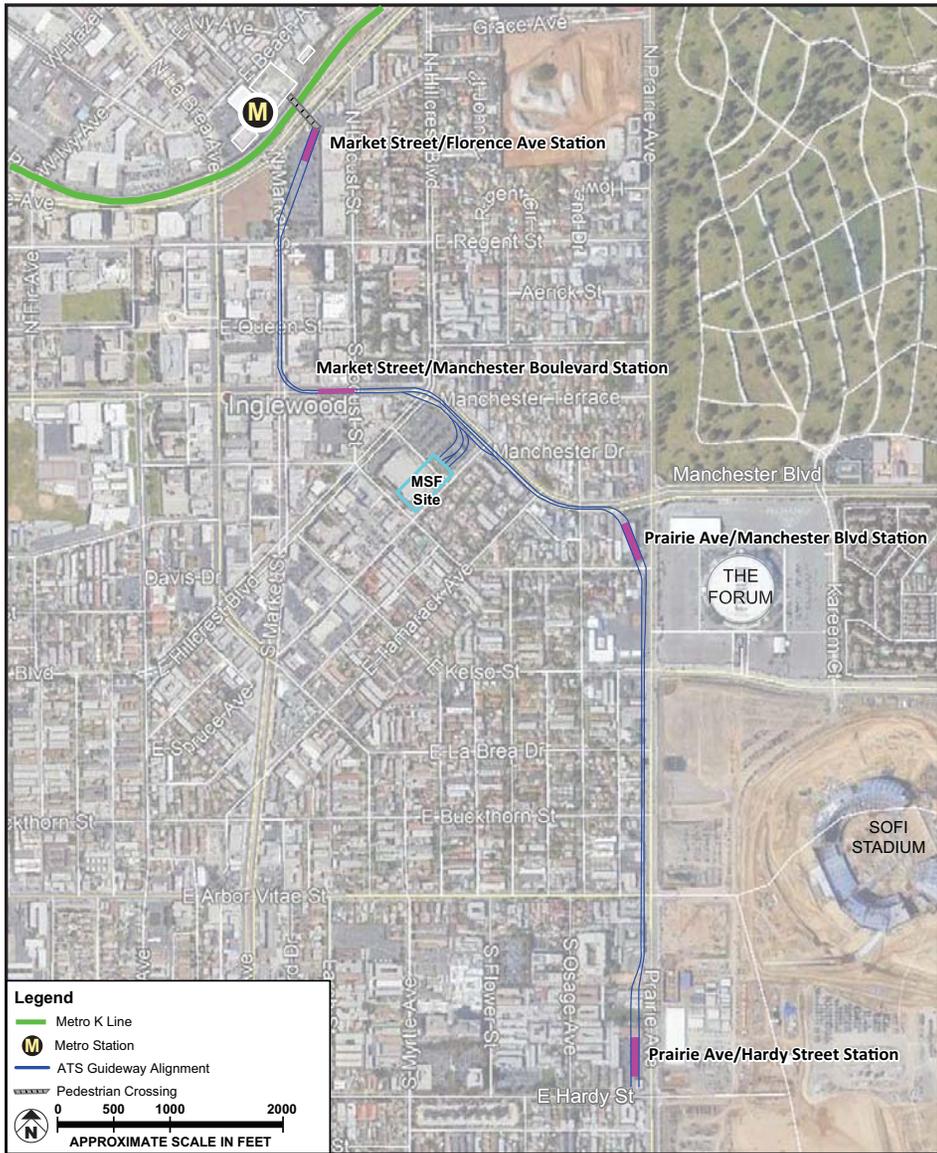


SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

FIGURE 5.0-2

Figure 5.0-2: Alternative 3: Market Street Pedestrian Promenade





SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021

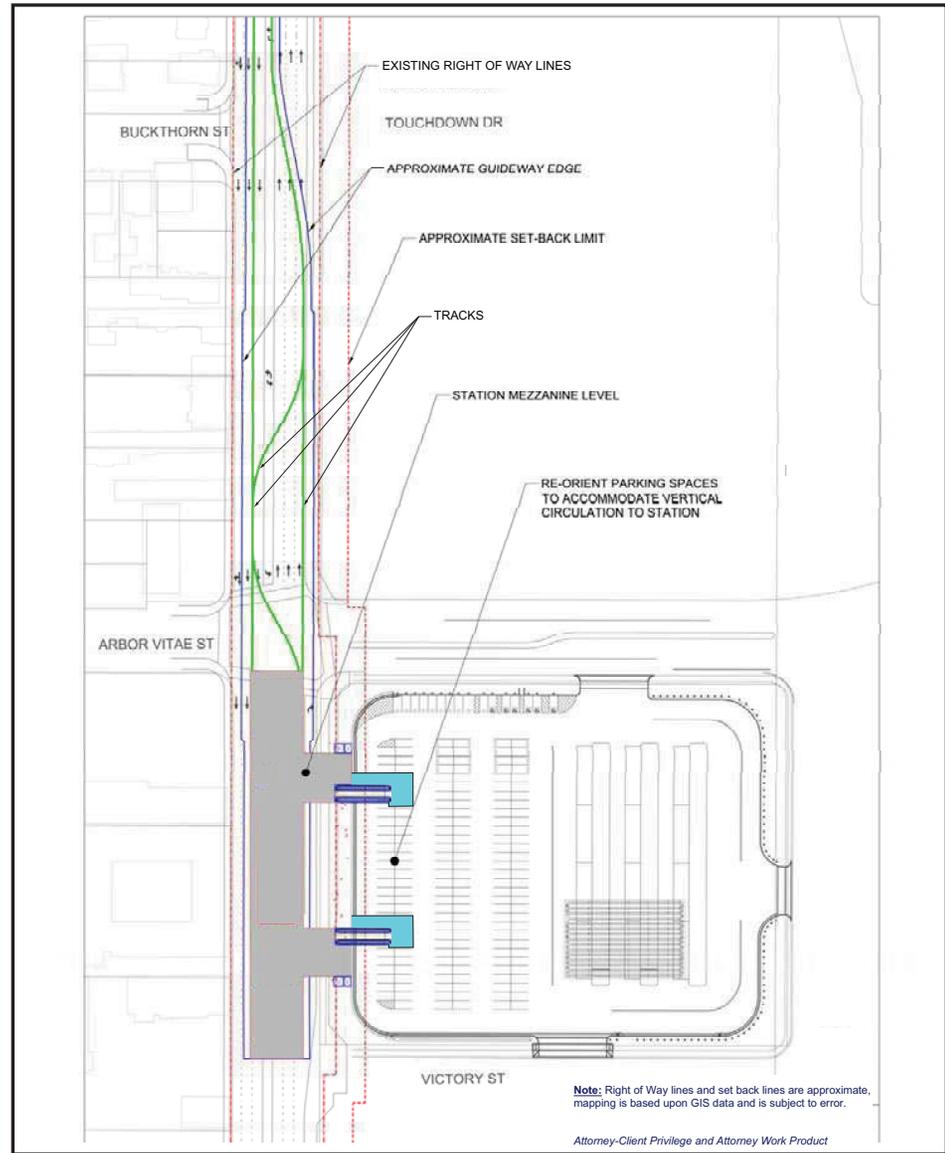
Illustrative and subject to adjustments as part of finalization during final design

FIGURE 5.0-3

Alternative 4 - 4th Station on Current Alignment



251-003-20



SOURCE: Google Earth - 2020; Meridian Consultants LLC - 2020

FIGURE 5.0-4

Alternative 5 - Prairie Ave Single Station Alternative



208-001-18

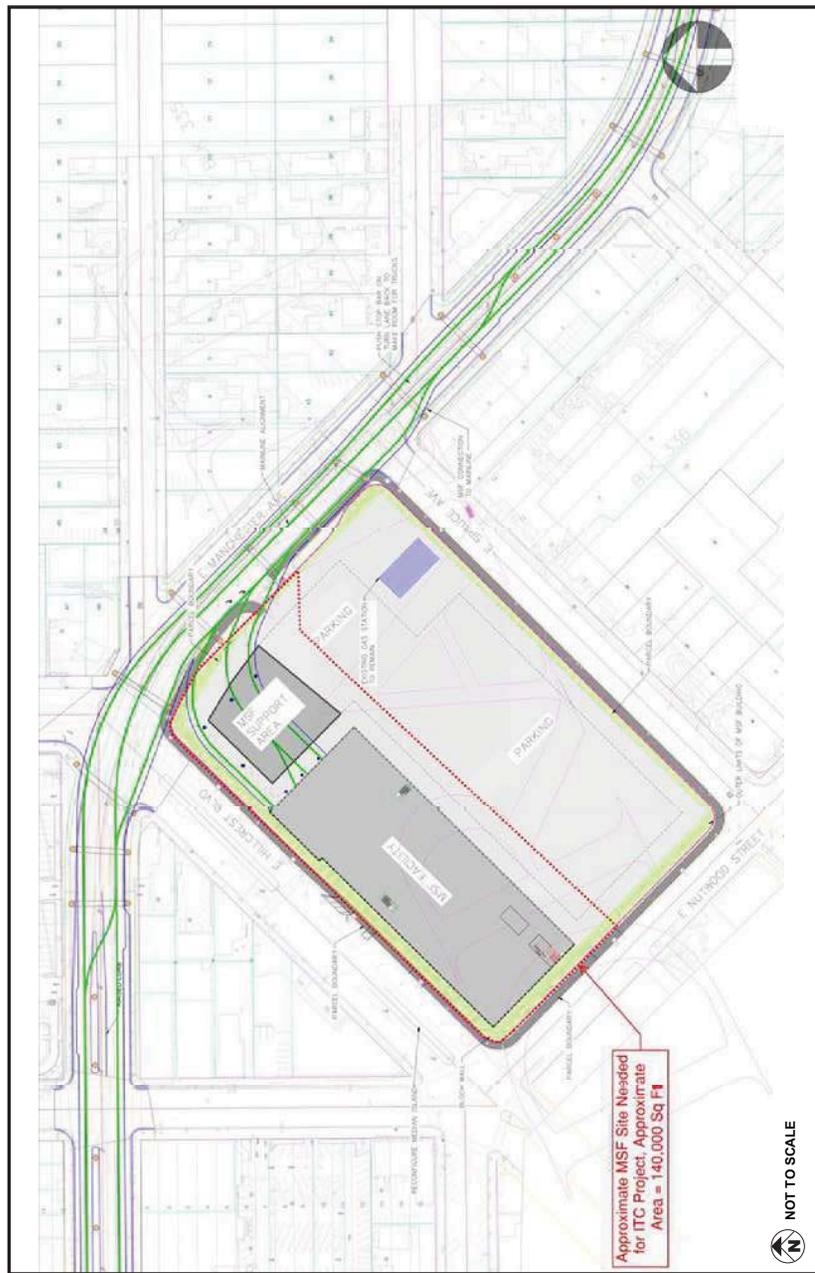


FIGURE 5.0-5

Alternative 6: Maintenance and Storage Facility Relocation Alternative

SOURCE: Gannett Fleming, Inc. - 2021; Meridian Consultants - 2021



251-003-20

## 5.5 EVALUATION OF ALTERNATIVES

### 5.5.1 Alternative 1: No Project

#### 1. Aesthetics

The proposed Project would not result in significant impacts to the aesthetic character of the community during construction or operation with implementation of the project design features in the ITC Construction Commitment Program (CCP) and ITC Design Standards and Guidelines (Design Guidelines). With Alternative 1, the proposed Project would not be built and existing visual characteristics along Market Street, Manchester Boulevard and Prairie Avenue would be maintained. As such, there would be no impact to the existing aesthetic character of the community because construction and operation of the Project would not occur. The Project would change the visual characteristics of the areas located along the proposed alignment but would not result in significant impacts. For this reason, neither this alternative or the Project would result in significant aesthetic impacts.

#### 2. Air Quality

Under the proposed project, mitigation measures would be required to reduce construction-related air quality impacts to less-than-significant levels. Under Alternative 1, no emissions related to construction activities and associated vehicular travel from construction activities or construction-related vehicle trips would occur. For this reason, even without mitigation, Alternative 1 would not conflict with implementation of the applicable air quality plan or exceed the thresholds established by the SCAQMD for criteria air pollutants.

Operation of the proposed Project would reduce vehicle miles traveled (VMTs) throughout the City which would result in the beneficial effect of reducing air quality emissions from vehicle trips. Under Alternative 1e, the proposed Project would not be built and VMTs throughout the City and region would not be reduced. As such, operational air quality emissions would be greater with the Alternative 1.

#### 3. Biological Resources

There are approximately 502 trees located along the proposed Project alignment. Removal and/or trimming of trees could result in significant impacts to protected migratory or nesting birds, or raptors. Measures are identified to mitigate these impacts to less than significant for the proposed Project. Alternative 1 would avoid these impacts. Thus, no impacts associated with biological resources would occur with Alternative 1, and impacts would be reduced in comparison to the proposed Project.

#### 4. Cultural Resources

The proposed Project would not result in significant impacts to historic resources on Market Street or the other segments. Alternative 1 would maintain the existing views and structures of the historic buildings and would result in no impacts to existing historical resources within the Project area since construction and operation of the proposed Project would not occur. Neither this alternative nor the Project would result in significant impacts to cultural resources.

#### 5. Energy Resources

Under Alternative 1, no energy resources such as electricity, natural gas, or petroleum would be consumed for construction. Operation of the proposed Project would consume a maximum net increase of 23,852,3876 kilowatt-hours (kWh) of electricity per year. As such, Alternative 1 would reduce operational electricity impacts. However, once operational, the proposed Project would result in a net decrease of 3,608,205 thousand British thermal units (kBTU) of natural gas per year.

The proposed Project would be consistent with the Inglewood Energy and Climate Action Plan (ECAP) and General Plan which sets goals to reduce emissions through increased energy efficiency, renewable energy generation, improved transit options, and reduced consumption and waste. The proposed Project would reduce VMTs which would reduce annual petroleum-based fuel consumption by 580,949 to 1,379,509 gallons per year. As such, Alternative 1 would increase impacts related to natural gas and petroleum-based fuel consumption Compared in comparison to the proposed Project.

#### 6. Geology and Soils

Alternative 1 would not involve the construction of any new transportation facilities. The Project is proposed in an area subject to groundshaking from earthquake events that may occur on faults in the region. Potentially active faults cross the proposed alignment for the Project. Measures are identified to mitigate potential impacts associated with these conditions to less than significant. Impacts related to construction of the Project, including the potential for construction activities to encounter and impact paleontological resources and an increase in the potential for erosion, would be avoided. Measures are identified to mitigate the potential impacts of the Project on paleontological resources to less than significant. Under Alternative 1, no new transportation infrastructure would be built within the project study area, aside from related transportation projects that are currently under construction or funded for construction and operation by 2027. This alternative would avoid these potential impacts.

#### 7. Greenhouse Gas Emissions

Alternative 1 would not involve any construction activity that would generate greenhouse gas (GHG) emissions. Operation of the proposed Project would reduce VMTs which would result in a beneficial effect

on GHG emissions. Under this alternative, the proposed Project would not be built and VMTs would not be reduced. As such, operational GHG emissions would be greater with the No Project Alternative. The proposed Project would be consistent with the CARB 2017 Scoping Plan Update, SCAG's 2020-2045 RTP/SCS, the ECAP, and General Plan which sets goals to reduce GHG emissions by increasing energy efficiency and improving transit infrastructure. While Alternative 1 would not be inconsistent with these plans, it would not achieve the goals of these plans as well as the proposed Project.

#### 8. Hazards and Hazardous Materials

With the No Project Alternative, no new construction would occur along the proposed Project alignment that could result in the potential for exposure to hazards or hazardous materials and all existing uses would continue to operate. Construction of the Project would include the demolition of existing buildings that may contain asbestos-containing materials (ACM) and lead based paint (LBP). Construction activities may also encounter underground storage tanks and soil that may be contaminated. The ITC CCP requires the preparation of plans defining protocols and actions to address this potential and avoid significant impacts. Alternative 1 would not involve the demolition of the existing buildings that would be removed to implement the Project, which may have the potential release hazardous materials, such as ACMs, LBP, and other potentially hazardous building materials. Additionally, Alternative 1 would not generate any construction emissions which may release Toxic Air Contaminants (TACs) at schools within one-quarter mile. Under this alternative, no construction activities would occur that would have the potential to conflict with emergency response plans or evacuation routes due to street and/or lane closures. As such, Alternative 1 would reduce the potential for impacts associated with hazards and hazardous materials in comparison to the proposed Project. The Project does, however, include project design features that would avoid impacts related to hazards and hazardous materials and, for this reason, this alternative would not lessen or avoid any significant impacts.

#### 9. Land Use and Planning

The No Project Alternative would not include the construction of the ATS and no changes to the land use pattern and character of the community would result from the construction or operation of additional transportation facilities. The proposed Project would remove traffic from existing roadways without diminishing the existing traffic capacity or the number of lanes that would exist with Alternative 1. Without the Project, congestion on roadways would increase more than with the Project, which would have an indirect effect on the character of the community.

Alternative 1 would be consistent with policies and goals in applicable plans as the existing character of the community would be maintained. The primary purpose of the Circulation Element of the City's General Plan is to ensure the provision of adequate street access and traffic capacity. The proposed Project would

further this goal by reducing congestion on the City's street network. As street congestion will increase without the proposed Project, the No Project Alternative would not achieve policies and goals related to reducing congestion.

#### 10. Noise and Vibration

No construction from the Project would occur along the proposed Project alignment with the No Project Alternative. No noise or groundborne vibration impacts from construction would occur and temporary noise and vibration impacts during construction impacts would be avoided. Therefore, Alternative 1 would avoid the noise and vibration impacts during Project construction. Operation of the proposed Project would reduce the amount of vehicle traffic on streets throughout the City, which would reduce roadway noise compared to this Alternative. Operation of the Project proposed trains would result in potential noise level increases from a low of 0.1 A-weighted decibel (dBA) to a high of 1.8 dBA, and operation of the proposed MSF would result in potential increases in noise levels around this facility ranging from no increase to a high of 3.9 dBA. Under Alternative 1, the Project would not be built or operate and these noise increases would not occur. As such, Alternative 1 would have a less than significant noise and vibration impact, and reduced construction and operational impacts in comparison to the proposed Project.

#### 11. Population, Employment, and Housing

The proposed Project would have no direct impact on housing as the proposed Project does not include the construction or demolition of any housing units. The proposed Project would impact existing employment opportunities in the City as commercial uses that would be displaced by the proposed Project are estimated to be approximately 464 jobs. However, the proposed Project would result in a net increase of for approximately 11,052<sup>5</sup> Full Time Equivalent (FTE) jobs through the Greenhouse Gas Reduction Funds, as estimated by the Job Co-Benefits calculation (see **Section 4.11 Population, Employment, and Housing**). The number of jobs that will be supported by the proposed Project in the region is within the projected regional trends in the SCAG 2020-2045 RTP/SCS data and the jobs that will benefit from the proposed Project will not directly translate into additional population growth in the region. As such the proposed Project would have a less than significant impact on employment and population growth.

No changes to existing population, employment, and housing trends within the City and the region would occur with the No Project Alternative. As such, Alternative 1 would not directly or indirectly substantially induce population or employment growth in the City or the region. While the No Project Alternative would avoid the direct loss of local employment opportunities that would result from the Project, the additional

<sup>5</sup> 11,516 minus 464 in numbers of jobs displaced.

jobs that would be supported by the construction and operation of the Project would not occur. Thus, more jobs would be created and supported under the proposed Project than under Alternative 1, and like Alternative 1, the proposed Project would not significantly impact population or housing.

#### 12. Transportation

Under Alternative 1, the proposed Project would not be built and none of the transit infrastructure and street improvements and activities would occur. Existing public transit operators and private transportation would continue to provide service in the City, and these services would likely expand operations in response to the expected growth in visitors and residents within the major activity centers in the City of Inglewood. The less than significant construction transportation effects or disturbances from the proposed Project would not occur with Alternative 1.

The City would implement its TMOP to provide future transit connectivity. The TMOP addresses traffic conditions and transportation needs before and after events at SoFi Stadium at Hollywood Park. While transit modes such as buses will be critical transportation options to access the City's event centers, these modes will still compete with existing roadway traffic and may not provide a convenient time-certain connectivity compared to an elevated rail connection such as the proposed Project. This alternative will not provide any operational benefits in comparison to those provided by the proposed Project. The congestion and delays on the roadway system areawide would remain under Alternative 1 compared to the improvement in congestion and roadway traffic flows anticipated as part of the proposed Project.

In addition, the substantial reductions in VMT and related reductions in GHG and air pollutant emissions that would be provided by the proposed Project would not be realized with the No Project Alternative. No operational benefits associated with reduction in VMT, reduced traffic flows or reduction in congestion would occur compared to the proposed Project, and a critical first/last mile gap between the City's housing, employment and activity centers and the regional Metro regional system would still exist

#### 13. Tribal Cultural Resources

The proposed Project would have a less than significant impact on Tribal Cultural Resources (TCRs). No TCRs were identified in the records around the Project site and no sensitive resources were identified. Nonetheless, the proposed Project would include construction which would have the potential to unearth subsurface resources not previously identified. Given the level of urban development in Inglewood, the likelihood of unearthing TCRs is low, but it is still a possibility. With the No Project Alternative, no construction would occur and this potential impact to TCRs would be avoided.

## 14. Utilities and Service Systems

With the No Project Alternative, no new construction would occur along the proposed Project alignment and all existing uses would continue to operate as they currently do. As such, no utility lines would need to be removed or relocated along Market Street, Manchester Boulevard, or Prairie Avenue. Alternative 1 would avoid construction impacts on utilities. Once operational, the proposed Project would not require further utility upgrades or relocation of utility infrastructure.

Operation of the proposed Project would consume a maximum net increase of 23.85 million kWh of electricity per year. Operation of the proposed Project would also result in a net decrease of 3.61 million kBtu of natural gas per year, and a net decrease of 71.86 acre-feet per year (afy) of water per year. With the No Project Alternative, this increase in electricity use would not occur, but the decrease in natural gas and water use that would result from the proposed Project would also not occur.

### Relationship to Project Objectives

The No Project Alternative would not meet any of the City's objectives for the proposed Project, except that it would maintain existing roadway capacity along Market Street.

## 5.5.2 Alternative 2: Bus Rapid Transit (BRT) System

### 1. Aesthetics

The proposed Project would not result in significant impacts to the aesthetic character of the community during construction or operation with implementation of the project design features in the ITCCCP and ITC Design Guidelines.

With Alternative 2, the proposed ATS guideway would not be built and existing visual characteristics along Market Street, Manchester Boulevard and Prairie Avenue would generally be maintained. As such, there would generally be little to no impact to the aesthetic character of the community because the BRT would be contained within the existing roadway system. For this reason, no potentially significant impact to the visual character of the area would occur with Alternative 2. The proposed Project would change the visual characteristics of the areas located along the proposed alignment but would not result in significant impacts. While Alternative 2 would result in fewer changes to the visual character of the area than the proposed Project, neither this alternative nor the proposed Project would result in significant aesthetic impacts.

### 2. Air Quality

The BRT System would require some modifications to existing streets in order to create dedicated transit lanes and stops but this construction would be less than the demolition and construction activities

associated with the proposed Project. This alternative would not conflict with implementation of the applicable air quality plans and unmitigated construction emissions would be substantially reduced compared to the proposed Project.

Though this Alternative would reduce VMTs, it would only be able to provide approximately 20 percent of the ridership capacity compared to the proposed Project. Moreover, Alternative 2 would reduce daily traffic volumes (ADTs) along key roadway corridors and VMTs on an average weekday basis to a lesser degree than the proposed Project. Specifically, typical weekday nonevent and daily VMT in the City would be reduced by an amount equivalent to 20 percent to 25 percent of those of the proposed Project. Moreover, under Alternative 2 the existing uses that would be removed by the proposed Project would remain operational and would not be replaced by the proposed Project components which generate less air pollutant emissions than the existing uses. As such, Alternative 2 would increase operational air quality impacts in comparison to the proposed Project.

### 3. Biological Resources

Approximately 502 trees are present along the proposed Project alignment which may require removal during construction of the proposed Project. The BRT System Alternative would only involve minor modifications to existing streets along the public right-of-way where BRT-only lanes along the route are implemented and BRT stops are constructed. Alternative 2 would not, therefore, require the same amount of potential tree removals as the proposed Project. Similar to the proposed Project, operation of Alternative 2 would not diminish the chances for long-term survival of bird species or their habitats and no additional tree and/or ornamental vegetation removals would occur. As such, Alternative 2 would result in similar operational impacts compared to the proposed Project.

### 4. Cultural Resources

The proposed Project would not result in significant impacts to historic resources on Market Street or the other segments. Alternative 2, which would involve minor modifications of existing streets, construction of bus stops, and the operation of a Bus Rapid Transit system, would also not result in significant impacts to cultural resources. For this reason, neither this alternative nor the Project would result in significant impacts to cultural resources.

### 5. Energy Resources

With Alternative 2, the proposed Project would not be built. No demolition or construction activities, which would consume energy resources would occur, except along the public right-of-way where BRT-only lanes and bus stops along the route would be located. As such, Alternative 2 would reduce construction impacts to energy resources. Operation of the proposed Project would consume a maximum

net increase of 23.85 million kWh of electricity per year. Alternative 2 would reduce operational electricity impacts. However, the proposed Project would result in a net decrease of 3.61 million kBtu of natural gas per year. Alternative 2 would not require demolition of existing land uses and would reduce traffic along key roadway corridors and VMT on an average weekday basis to a lesser degree than the proposed Project. For this reason, Alternative 2 would increase impacts related to natural gas and petroleum-based fuel consumption. The proposed Project would be consistent with the ECAP and General Plan which sets goals to reduce emissions through increased energy efficiency, renewable energy generation, improved transit options, and reduced consumption and waste. Alternative 2 would address the goals and policies within these plans by improving transit options but to a lesser degree than the proposed Project.

## 6. Geology and Soils

Under Alternative 2, impacts related to geology and soil conditions, including paleontological resources, would be less compared to the proposed Project. The Project is proposed in an area subject to groundshaking from earthquake events that may occur on faults in the region. Potentially active faults cross the proposed alignment for the Project. Measures are identified to mitigate potential impacts associated with these conditions to less than significant. Because Alternative 2 would occur in the location as the proposed Project, the geological and soils conditions that would be encountered in construction of Alternative 2 would be the similar as with the proposed Project, but because substantially less construction would be required, potential risks associated with ground-shaking would be reduced as compared to the proposed Project. During operations, potential risks from seismic events would be reduced with an at-grade system as no aerial structures would be built. Because there would be substantially less construction with an at-grade BRT system, the potential for accidental discovery of paleontological resources would decrease.

## 7. Greenhouse Gas Emissions

Under Alternative 2, the proposed Project would not be built. No demolition or construction activities which would produce GHG emissions would occur, except along the public right-of-way where BRT-only lanes and bus stops along the route would be located. As such, Alternative 2 would reduce construction GHG impacts compared to the proposed Project.

Though this alternative would reduce VMT, it would only be able to provide approximately 20 percent of the ridership capacity of the proposed Project. Alternative 2 would reduce traffic along key roadway corridors and VMT on an average weekday basis to a lesser degree than the proposed Project. Specifically, typical weekday nonevent and daily VMT in the City would be reduced by an amount equivalent to 20 percent to 25 percent of those of the proposed Project. Additionally, dedicated bus lanes would take away roadway carrying capacity for private vehicles and increase local traffic congestion. As such, Alternative 2

would not decrease operational GHG emissions to the same degree as the proposed Project.

Similar to the proposed Project, Alternative 2 would be consistent with the CARB 2017 Scoping Plan Update, SCAG 2020-2045 RTP/SCS, the ECAP, and General Plan which sets goals to reduce GHG emissions by improving transit infrastructure. However, Alternative 2 would improve transit infrastructure at a lesser degree compared to the proposed Project and would not result in more energy efficient uses being developed in place of the less energy efficient existing uses.

## 8. Hazards and Hazardous Materials

With the BRT Transit system alternative, the proposed Project would not be built. No construction of the guideway and stations in conjunction with the MSF and PDS substations would occur. Construction of the Project would include the demolition of existing buildings that may contain ACM and LBP. Construction activities may also encounter underground storage tanks and soil that may be contaminated. The ITC CCP requires the preparation of plans defining protocols and actions to address this potential and avoid significant impacts. Alternative 2 would not involve the demolition of existing buildings, which may have the potential release hazardous materials, such as ACMs, LBP, and other potentially hazardous building materials. Additionally, Alternative 2 would generate a lower amount of construction emissions which may release TACs at schools within one-quarter mile. Transportation of hazardous materials during construction of the proposed Project would also not likely occur with this alternative. The potential for accidental release of hazardous materials in the environment would be significantly lessened when compared to the proposed Project.

Operation of the proposed Project would include the use and storage hazardous materials during operation typical of those used in an industrial setting. Compliance with federal, State, and local laws and regulations relating to transport, storage, disposal, and handling of hazardous materials would minimize any potential for accidental release or upset of hazardous materials during station operation. Under Alternative 2, operation of a BRT system would include the use and storage of similar materials. As such, operational impacts under Alternative 2 would be similar to those of the proposed Project.

## 9. Land Use and Planning

Alternative 2 would not include the construction of the ATS system or any of the associated supporting facilities. The proposed Project would remove traffic from existing roadways without diminishing the existing traffic capacity or the number of lanes. With the BRT system alternative, an existing lane of travel would be dedicated for use by buses along the route, which would reduce the lane capacity for other vehicles and increase local traffic congestion for passenger vehicles in the community. This increase in

congestion on roadways under Alternative 2 would have an indirect effect on the character of the community.

Alternative 2 would be generally consistent with all existing goals, plans, and policies as it would maintain the majority of the infrastructure in the surrounding communities, allowing the goals and objectives of the existing plans to be carried out generally. Notwithstanding, in certain locations there could be conflicts with the design of existing roadways, roadway capacity, and the City's circulation element and amendments to City documents may be needed to avoid these conflicts. Land use impacts would be similar with this alternative and the proposed Project.

### 10. Noise and Vibration

Under Alternative 2 the proposed Project would not be built. No demolition or construction activities which would produce noise or groundborne vibration impacts would occur, except along the public right-of-way where BRT-only lanes and bus stops are located. As such, construction noise and vibration impacts would be reduced. Though this alternative would reduce VMT, it would only be able to provide approximately 20 percent of the ridership capacity compared to the proposed Project. Alternative 2 would reduce traffic volumes along key roadway corridors and VMT on an average weekday basis to a lesser degree than the proposed Project. Specifically, typical weekday nonevent and daily VMT in the City would be reduced by an amount equivalent to 20 percent to 25 percent of those of the proposed Project. With the proposed Project, operation of the ATS trains would result in noise levels increases from a low of 0.1 dBA to a high of 1.8 dBA, and operation of the proposed MSF would result in noise increases ranging from no increase to a high of 3.9 dBA. Under Alternative 2, the ATS would not be built or operate and these noise increases would not occur. However, increased bus traffic on these roadways would increase the local noise levels and, as such, noise and vibration impacts associated with operation of Alternative 2 would be similar to the proposed Project.

### 11. Population, Employment, and Housing

The proposed Project would have no direct impact on housing as the proposed Project does not include the construction or demolition of any housing units. The proposed Project would impact existing employment opportunities in the City as commercial uses that would be displaced by the proposed Project are estimated to be approximately 464 jobs. However, the proposed Project would result in a net increase of approximately 11,052<sup>6</sup> FTE jobs, as estimated by the Job Co-Benefits calculation (see **Section 4.11 Population, Employment, and Housing**). The number of jobs that will be supported by the proposed Project in the region is within the projected regional trends in by the SCAG 2020-2045 RTP/SCS data and

<sup>6</sup> 11,516 minus 464 in numbers of jobs displaced.

the jobs that will benefit from the proposed Project will not directly translate into additional population growth in the region. As such the proposed Project would have a less than significant impact on inducing employment and population growth.

Alternative 2 would maintain the existing population and housing trends within the City and the region while having a minor impact on employment by hiring personnel for the BRT System construction and operation. As such, Alternative 2 would not significantly impact population or employment growth in the City or the region. As such, Alternative 2 would have similar impacts on population and housing conditions, although the beneficial effects of this alternative would be substantially reduced as compared to the proposed Project.

### 12. Transportation

Under Alternative 2, the City would construct and operate a BRT system that would connect the LASED, including the Performance Arena, other mixed uses in the Hollywood Park Specific Plan area, SoFi Stadium, the Forum, and the IBEC to the K Line Downtown Inglewood station. Under this alternative, the proposed Project would not be built. No demolition or construction activities would occur, except along the public right-of-way where BRT-only lanes and bus stops along the route would be located. As such, Alternative 2 would reduce impacts associated with the construction of transportation facilities.

One to two roadway lanes would be lost to mixed traffic flow along the BRT alternative route depending upon location. With a maximum potential headway of approximately 3 minutes at peak times, Alternative 2 would only be able to provide approximately 20 percent of the capacity compared to the proposed Project. The proposed plan amendments included in the proposed Project would not occur. The area would continue to be used by the existing commercial, recreational, and other uses.

Alternative 2 would provide operational benefits by reducing traffic volumes along key roadway corridors and VMT on an average weekday basis to a lesser degree than the proposed Project. Specifically, typical weekday nonevent and daily VMT in the City would be reduced by an amount equivalent to 20 percent to 25 percent of those of the proposed Project. The estimated daily BRT ridership with Event Conditions would be approximately 20 percent of the projected proposed Project ridership. Sufficient transit connection capacity between the Metro's regional transit system and the City's new major activity centers and entertainment venues would not be provided by this alternative. Additionally, this alternative would reduce the roadway capacities along Florence Avenue, Prairie Avenue, Manchester Boulevard and Market Street, consequently, increasing traffic congestion areawide. In comparison, the proposed Project would not reduce roadway capacities compared to existing conditions and would improve congestion and traffic flows areawide. As such, Alternative 2 would obtain limited operational benefits while substantially

worsening traffic flows and congestion Transportation impacts of Alternative 2 would be increased as compared to the proposed Project.

### 13. Tribal Cultural Resources

The proposed Project would have a less than significant impact on Tribal Cultural Resources (TCRs), No TCRs were identified in the records around the Project site and no sensitive resources were identified. Nonetheless, the proposed Project would include construction which would have the potential to unearth subsurface resources not previously identified. Given the level of urban development in Inglewood, the likelihood of unearthing TCRs is low but it is still a possibility. Alternative 2 would eliminate the need to construct the ATS and this potential impact to TCRs would be avoided. TCR impacts for Alternative 2 would be reduced as compared to the proposed Project.

### 14. Utilities and Service Systems

Under Alternative 2 the proposed Project would not be built. No demolition or construction activities would occur, except along the public right-of-way where BRT-only lanes and bus stops along the route are located. As such, no utility lines would need to be removed or relocated along Market Street, Manchester Boulevard, or Prairie Avenue, which would reduce construction impacts.

Once operational, the proposed Project and Alternative 2 would not require further utility upgrades or relocation of utility infrastructure, except for potential electric charging infrastructure. However, as discussed previously, operation of the proposed Project would consume a maximum net increase of 23.85 million kWh of electricity per year. Alternative 2 would reduce operational electricity demands in comparison to the proposed Project. However, operation of the proposed Project would result in a net decrease of 3.61 million kBTU of natural gas per year, and a net decrease of 71.86 afy of water per year. Alternative 2 would not result in similar reductions in utility demands.

### ***Relationship to Project Objectives***

The BRT System Alternative would meet some, but not all of the City's objectives for the proposed Project. The objectives to provide a direct and convenient connection to the Metro regional transit system, encourage intermodal transportation systems by providing convenient, safe, and reliable transit and convenient access to businesses in the City would be met by this alternative. However, the objective related to providing sufficient transit connection capacity between Metro's regional transit system and the City new major activity centers would, although not be met by this alternative, would still result in limited increased transit mode split, limited reduction in vehicle trips, and consequently, limited reduction in per-capita vehicle miles traveled to the City's major activity centers. The BRT System Alternative would also partially meet the City's objectives to support the ongoing economic revitalization within the

Downtown TOD Plan area and encourage redevelopment and investment within the City in areas served by the proposed Project, but not to the same degree as the proposed Project.

This alternative would partially meet the City's objective to support regional efforts to become more efficient, economically strong, equitable, and sustainable. Though the BRT System Alternative would provide limited operational benefits by reducing traffic volumes along key roadway corridors, it would also reduce the roadway capacities along Florence Avenue, Prairie Avenue, Manchester Boulevard and Market Street, consequently increasing traffic congestion throughout the City. As such, this alternative would not meet the City's objectives to maintain existing roadway capacity or reduce the City's traffic congestion and alleviate growing demand on the existing roadway network on both major arterials and residential streets for both nonevent and event days.

### 5.5.3 Alternative 3: Market Street Pedestrian Promenade

#### 1. Aesthetics

With this alternative, the proposed Project and all of its components would be constructed and operate, but Market Street between Florence Avenue and Manchester Boulevard would be closed to vehicular traffic. Alternative 3 would require the placement of barricades to prevent vehicle access. These barricades would need to be designed in a manner which would not degrade the existing visual character of Downtown. As the ATS system as proposed would be constructed with this alternative, the aesthetic impacts of the proposed Project would be similar to the proposed Project.

#### 2. Air Quality

Construction under Alternative 3 would be similar to the proposed Project. During construction, the proposed Project would not exceed the significance threshold for any criteria pollutant after mitigation, and impacts would be less than significant. Therefore, similar to the proposed Project, Alternative 3 would not conflict with implementation of the applicable air quality plans and would not exceed thresholds established by the SCAQMD for criteria air pollutants.

Operational impacts associated with Alternative 3 would be similar to the proposed Project as the Pedestrian Promenade would not generate additional air quality emissions. Moreover, reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis with event would occur similar in magnitude to those associated with the proposed Project. As such, Alternative 3 would result in similar operational impacts compared to the proposed Project.

### 3. Biological Resources

Approximately 502 trees along the proposed Project alignment may require removal during construction of the proposed Project. The addition of a Pedestrian Promenade would not require tree removals and would likely include the planting of additional trees. As such, impacts to biological resources during construction would be reduced compared to the proposed Project. Alternative 3 would not diminish the chances for long-term survival of bird species or their habitats and no additional tree and/or ornamental vegetation removals would be required. As such, Alternative 3 would result in similar operational impacts compared to the proposed Project.

### 4. Cultural Resources

Closing a portion of Market Street in downtown Inglewood to vehicle use, which would occur with Alternative 3, would not result in any significant impacts to historic resources located on Market Street. Conversion of this portion of Market Street to a pedestrian mall would not result in any additional direct or indirect impacts to historic or other cultural resource impacts compared to the proposed Project, nor would it substantially reduce the cultural resources impacts of the proposed Project. Neither this alternative nor the Project would result in significant impacts to cultural resources.

### 5. Energy Resources

Energy demand from construction activities under Alternative 3 would be similar to the proposed Project as the ATS system would be built as proposed. The additional construction required to create the pedestrian mall would only increase these impacts incrementally. Reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis would occur similar in magnitude to those associated with the proposed Project. As such, Alternative 3 would result in similar operational impacts compared to the proposed Project.

### 6. Geology and Soils

Under Alternative 3, the proposed Project would be built but would include a pedestrian promenade on Market Street between Florence Avenue and Manchester Boulevard. Impacts related to geology and soils conditions, including paleontological resources, would be similar to those identified for the proposed Project. Geology and soils conditions that would be encountered in construction of Alternative 3 would be the same as with the proposed Project. The Potrero Fault lies approximately one-quarter mile to the east of the project study area; however, compliance with the California Building Code would avoid the creation of seismic hazards. Ground-disturbing activity and the potential for accidental discovery of paleontological resources would continue to be potentially significant with Alternative 3. Alternative 3

would implement similar measures as the proposed Project to mitigate the potential impacts on paleontological resources to less than significant.

### 7. Greenhouse Gas Emissions

Construction under Alternative 3 would be similar to the proposed Project and would result in a similar level of GHG emissions. Reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis would occur similar in magnitude to those associated with the proposed Project. Therefore, similar to the proposed Project, Alternative 3 would be consistent with the CARB 2017 Scoping Plan Update, SCAG's 2020-2045 RTP/SCS, the ECAP, and General Plan which sets goals to reduce GHG emissions by increasing energy efficiency and improving transit infrastructure. Operational GHG impacts would be similar to the proposed Project.

### 8. Hazards and Hazardous Materials

Under Alternative 3, the proposed Project would be built but would include the pedestrian promenade. Construction under Alternative 3 would be similar to the proposed Project. Construction of the guideway and stations in conjunction with the MSF and PDS substations would involve the demolition of existing buildings, which may have the potential release hazardous materials, such as ACMs, LBP, and other potentially hazardous building materials. The additional construction activities required to create the pedestrian promenade would be minor. Similar to the proposed Project, construction activities under Alternative 3 would likely cause the temporary closure of travel lanes, roadway segments, and sidewalks along the elevated guideway and stations within the street rights-of-way.

Under Alternative 3, operation of the ATS would include the use and storage of hazardous materials typical of those used in an industrial setting, similar to the proposed Project. Alternative 3 would not interfere or impair with the City's ability to increase public awareness or make any improvements to emergency services and warning systems during operation. Converting this portion of Market Street to a pedestrian promenade would not involve the use of handling of any hazardous materials. With adherence to the federal, State, and local safety requirements, Alternative 3 would not conflict with the requirements of an emergency response plan or emergency evacuation plan, similar to the proposed Project. As such, operational impacts under Alternative 3 would be similar to the proposed Project.

### 9. Land Use and Planning

Alternative 3 would modify existing traffic patterns and connections within the community. Vehicular connections would be reduced as Market Street between Florence Avenue and Manchester Boulevard would be closed. Vehicular traffic would need to be rerouted around the closed pedestrian promenade which may increase local traffic volume for adjacent streets. The connection between different parts of

the community would not be diminished in a substantial manner as the street segment that would be closed only includes three blocks. Alternative 3 would not, therefore, divide the community physically but may contribute to additional ground level traffic surrounding the closure.

Alternative 3 would be generally consistent with all existing goals, plans, and policies as it would maintain the majority of the infrastructure in the surrounding community, allowing the goals and objectives of the existing plans to be carried out generally. Additionally, closure of Market Street would enable the activation and programming of Market Street, which could include open air markets, creative retail and concession spaces, recreational and open space areas, and locations for public art and locations for public gathering. This Alternative could achieve City's objective for economic development of Market Street. Conflicts with the design of existing roadways, roadway capacity, and the City's circulation element may exist and appropriate design and amendments proposed for City documents would be needed to avoid conflicts with existing plans and policies. The land use impacts of this alternative and the proposed Project would be similar and less than significant.

#### 10. Noise and Vibration

Construction under Alternative 3 would be similar to the proposed Project. It is anticipated that the development of a Pedestrian Promenade along Market Street would not result in substantial noise or vibration impacts as it would eliminate vehicle travel along Market Street between Florence Avenue and Manchester Boulevard which would reduce roadway noise. Moreover, reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis with event would occur similar in magnitude to those associated with the proposed Project. The operational impacts of the Project would be less than significant. As such, operational noise and vibration impacts would be reduced in comparison to the proposed Project.

#### 11. Population, Employment, and Housing

The proposed Project would have no direct impact on housing as the proposed Project does not include the construction or demolition of housing units. The proposed Project would impact existing employment opportunities in the City as commercial uses that would be displaced by the proposed Project are estimated to be approximately 464 jobs. However, the proposed Project would result in a net increase of approximately 11,052<sup>7</sup> FTE jobs through the Greenhouse Gas Reduction Funds, as estimated by the Job Co-Benefits calculation (see **Section 4.11 Population, Employment, and Housing**). The number of jobs that will be supported by the proposed Project in the region is within the projected regional trends in the SCAG 2020-2045 RTP/SCS data and the jobs that will benefit from the proposed Project will not directly

<sup>7</sup> 11,516 minus 464 in numbers of jobs displaced.

translate into additional population growth in the region. As such the proposed Project would have a less than significant impact on inducing employment and population growth.

Converting a portion of Market Street to a pedestrian mall would not result in any additional direct or indirect impacts to population, employment, and housing. Alternative 3 would maintain the existing population, employment, and housing trends within the City and the region. As such, Alternative 3 would not directly or indirectly substantially induce population in the City or the region. Employment support and would be similar to the proposed Project under Alternative 3.

#### 12. Transportation

Construction under Alternative 3 would be similar to the proposed Project. The proposed Project and all of its components would be constructed and operational. Market Street between Florence Avenue and Manchester Boulevard would be reconfigured to eliminate vehicular traffic north and south on Market Street. Cross traffic would be allowed on Regent Street and Queen Street without any turns to/from Market Street. The closure of Market Street would divert traffic to the surrounding streets including La Brea Avenue and Locust Street. Since the current traffic along Market Street is very low, this diversion of Market Street traffic can be accommodated along adjacent parallel streets. The operation of the ATS would be the same as planned for the proposed Project.

Similar to the proposed Project, Alternative 3 would result in operational benefits. Reductions to daily traffic volumes along key roadway corridors and reductions to VMTs on an average weekday basis would occur similar in magnitude to those associated with the proposed Project. Additionally, this alternative is estimated to result in transit ridership similar to the proposed Project. Finally, Alternative 3 would provide similar operational benefits as those of the proposed Project relative to reduction in traffic congestion and improvement of traffic flows along key roadway facilities areawide.

#### 13. Tribal Cultural Resources

The proposed Project would have a less than significant impact on Tribal Cultural Resources (TCRs), No TCRs were identified in the records around the Project site and no sensitive resources were identified. Nonetheless, the Project as proposed would include construction which would have the potential to unearth subsurface resources not previously identified. Given the level of urban development in Inglewood, the likelihood of unearthing TCRs is low but it is still a possibility. Converting a portion of Market Street to a pedestrian promenade would not result in any additional impacts.

## 14. Utilities and Service Systems

Construction and operation under Alternative 3 would be similar to the proposed Project. Closing a portion of Market Street to vehicle traffic would only involve minor above ground street improvements. For this reason, impacts related to the construction or relocation of water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities would be similar compared to the proposed Project.

### ***Relationship to Project Objectives***

The Market Street Pedestrian Promenade Alternative would meet most of the City's objectives for the proposed Project since the proposed Project would still be built and reductions to daily traffic volumes along key roadway corridors and reductions to VMTs on an average weekday basis with event would occur similar in magnitude to those associated with the proposed Project. However, Alternative 3 would have not meet the City's objective to maintain existing roadway capacity along Market Street.

## 5.5.4 Alternative 4: 4<sup>th</sup> Station Alternative

### 1. Aesthetics

Under the 4<sup>th</sup> station alternative, impacts to visual character under aesthetics would be similar to the proposed Project. The proposed Project would not result in significant impacts to the aesthetic character of the community during construction or operation with implementation of the project design features in the CCP and Design Guidelines. The addition of a 4<sup>th</sup> station east of the intersection of Market Street and Manchester Boulevard would not result in any additional visual impacts as this station would be integrated into the design of the ATS consistent with the Design Guidelines.

### 2. Air Quality

Under Alternative 4, the proposed Project would be built but would include an additional station along Manchester Boulevard. During construction, the proposed Project would not exceed the significance threshold for any criteria pollutant after mitigation, and impacts would be less than significant. The construction of a 4<sup>th</sup> station would require additional construction activities including operation of off-road heavy-duty equipment and on-road trucks for hauling which would increase air quality emissions. Though Alternative 4 would implement similar mitigation measures as the proposed Project, it would increase construction impacts.

Operation of the ATS with a 4<sup>th</sup> station would not result in any additional operational air quality emissions. Operational air quality impacts would be similar with this alternative and the proposed Project.

## 3. Biological Resources

Approximately 502 trees are located along the proposed ATS alignment that may require removal during construction of the proposed Project. The 4<sup>th</sup> station would be located along the guideway within the public right-of-way along Manchester Boulevard. With Alternative 4, no additional properties would need to be acquired and no additional demolition of buildings or site improvements would be required. Alternative 4 would not require an increase in tree removals or disturbance of nesting raptors or migratory birds. For this reason, impacts to biological resources during construction would be similar compared to the proposed Project. Moreover, operation of Alternative 4 would not diminish the chances for long-term survival of bird species or their habitats and no additional tree and/or ornamental vegetation removals would be planned. As such, Alternative 4 would result in similar operational impacts compared to the proposed Project.

## 4. Cultural Resources

Alternative 4 would have impacts on cultural resources similar to the proposed Project. Alternative 4 would construct the ATS guideway on the same alignment with the same dimensions as the proposed Project. The additional station would not result in any additional impacts because the additional station and this segment of the guideway would be constructed above the nearby historic resource, the Bank of America building at 320 Manchester Boulevard. The Bank of America building would retain its ability to convey its historical significance without additional indirect impact to the view of its primary façade. As such impacts to cultural resources would be similar for Alternative 4 and the proposed Project.

## 5. Energy Resources

Under Alternative 4, the proposed Project would be built but would include an additional station along Manchester Boulevard. Construction of a 4<sup>th</sup> station would result in an incremental increase in energy resource consumption for electricity and petroleum-based fuels for construction of this station. However, this increase would be minimal and temporary, similar to the proposed Project. Nonetheless construction impacts to energy resources would increase incrementally compared to the proposed Project.

Operation of a 4<sup>th</sup> station would increase consumption of energy resources including electricity and natural gas. This alternative would result in reductions to daily traffic volumes along key roadway corridors and VMT on an average weekday basis would occur similar in magnitude to those estimated for the proposed Project, although the addition of a 4<sup>th</sup> station could incrementally increase ridership. As such, this alternative would result in a reduction of petroleum-based fuel consumption from vehicle travel similar or to a slightly greater degree than the proposed Project. The addition of one station would not increase energy resource consumption to a level of significance.

## 6. Geology and Soils

Under Alternative 4, the proposed Project would be built but would include an additional station along Manchester Boulevard. Impacts related to geology and soils conditions, including paleontological resources, and potential conflict with an emergency evacuation plan, would be similar to those described for the proposed Project. Geology and soils conditions that would be encountered in construction of Alternative 4 would be the same as with the proposed Project. The Potrero Fault lies approximately one-quarter mile to the east of the project study area; however, compliance with the California Building Code would avoid the creation of seismic hazards. Ground-disturbing activity and the potential for accidental discovery of paleontological resources would continue to be potentially significant under Alternative 4. Alternative 4 would implement similar measures as the proposed Project to mitigate the potential impacts on paleontological resources to less than significant.

## 7. Greenhouse Gas Emissions

Under Alternative 4, the proposed Project would be built but would include an additional station along Manchester Boulevard. Construction of a 4th station would require additional construction activities including operation of off-road heavy-duty equipment and on-road trucks for hauling which would increase GHG emissions. However, similar to the proposed Project, these emissions would be temporary in nature and cease once the Project is complete. Nonetheless, construction related GHG emissions would increase under Alternative 4.

Operation of a 4th station would incrementally increase operational GHG emissions. However, this alternative would result in reductions to daily traffic volumes along key roadway corridors and VMT on an average weekday basis would occur similar in magnitude to those estimated for the proposed Project. As such, this alternative would result in a net negative GHG emissions associated with vehicle travel. The addition of one station would not increase operational GHG emissions to a level of significance. Moreover, similar to the proposed Project, Alternative 4 would be consistent with the CARB 2017 Scoping Plan Update, SCAG 2020-2045 RTP/SCS, the ECAP, and General Plan which sets goals to reduce GHG emissions by increasing energy efficiency and improving transit infrastructure. Nonetheless, operational GHG emissions would increase incrementally with Alternative 4.

## 8. Hazards and Hazardous Materials

Under Alternative 4, the proposed Project would be built but would include an additional station along Manchester Boulevard. Although construction of an additional station would increase construction activities compared to the proposed Project, construction impacts under Alternative 4 would be similar to those of proposed Project. Construction of the guideway and four stations in conjunction with the MSF and PDS substations would still involve the demolition of existing buildings, which may have the potential

release hazardous materials, such as ACMs, LBP, and other potentially hazardous building materials. Furthermore, excavations of potentially contaminated soils may occur during construction of Alternative 4 as a result of prior uses on some of the sites, similar to the proposed Project.

Under Alternative 4, operation would include the use and storage of hazardous materials typical of those used in an industrial setting, similar to the proposed Project. Alternative 4 would not interfere with or impair the City's ability to increase public awareness or make any improvements to emergency services and warning systems during operation. With adherence to the federal, State, and local safety requirements, Alternative 4 would not conflict with the requirements of an emergency response plan or emergency evacuation plan, similar to the proposed Project. As such, operational impacts under Alternative 4 would be similar when compared to the proposed Project.

## 9. Land Use and Planning

Alternative 4 would build an ATS similar to the proposed Project with a 4<sup>th</sup> station located on Manchester Boulevard. The proposed Project would not physically divide the community with its elevated guideways and maintenance of existing roadway capacity and roadway connections. Alternative 4 would have an alignment and elevated guideways similar to the proposed Project. As such, Alternative 4 would also maintain the existing roadway capacity and roadway connections. Alternative 4 could activate foot traffic and interest on Market Street and help reinvigorate the Downtown business area. Alternative 4 will have a similar impact on physically dividing the community as the proposed Project.

Alternative 4 would be generally consistent with the existing plans, policies and guidelines in the City and the greater region. Alternative 4 would require the same amendments to the Land Use Element, Circulation Element, Safety Element, Environmental Justice Element, and the Inglewood Municipal Code as the proposed Project to incorporate the ATS into the language of the existing plans, policies, and guidelines within the City. As such, land use impacts of Alternative 4 would be similar to the proposed Project with neither this alternative nor the proposed Project resulting in significant land use impacts.

## 10. Noise and Vibration

Under Alternative 4, the proposed Project would be built but would include an additional station along Manchester Boulevard. Construction of a 4th station would require additional construction activities including operation of off-road heavy-duty equipment and on-road trucks for hauling which could increase construction noise and vibration levels. Though Alternative 4 would implement similar mitigation measures as the proposed Project, it would increase construction noise and vibration impacts.

Alternative 4 would result in reductions to daily traffic volumes along key roadway corridors and VMT on an average weekday basis would occur similar or slightly increased in magnitude to those estimated for

the proposed Project. As such, this alternative would result in similar or slightly increased roadway noise levels as the proposed Project. The addition of one station would not increase operational noise or vibration levels to a level of significance.

### 11. Population, Employment, and Housing

The proposed Project would have no direct impact on housing as the proposed Project does not include the construction or demolition of any housing units. The proposed Project would impact existing employment opportunities in the City as commercial uses that would be displaced by the proposed Project are estimated to be approximately 464 jobs. However, the proposed Project would result in a net increase of for approximately 11,052<sup>8</sup>FTE jobs as estimated by the Job Co-Benefits calculation (see **Section 4.11 Population, Employment, and Housing**). The number of jobs that will be supported by the proposed Project in the region is within the projected regional trends in the SCAG 2020-2045 RTP/SCS data and the jobs that will benefit from the proposed Project will not directly translate into additional population growth in the region. As such the proposed Project would have a less than significant impact on inducing employment and population growth.

Alternative 4 would have a similar effect on the population and employment trend as the ATS would be constructed and the same displacement of jobs and hiring of ATS personnel would occur. As such, Alternative 4 would have similar population, employment, and housing impacts as the proposed Project.

### 12. Transportation

Under Alternative 4, the proposed Project would be built but would include an additional station along Manchester Boulevard. Construction of a 4th station would require additional construction activities including operation of off-road heavy-duty equipment and on-road trucks for hauling which could increase transportation effects and disruptions.

The weekday daily VMT would be reduced in the Future Opening Year (2027) with Event conditions similar to the VMT reductions estimated for the proposed Project. The estimated daily ITC ridership during Future Opening Year (2027) with NFL Event conditions are estimated to be approximately 29,300 passengers similar to the proposed Project. The weekday daily VMT would be reduced in the Future Horizon Year (2045) with Event conditions similar to the VMT reductions estimated for the proposed Project. The estimated daily ITC ridership during Future Horizon Year (2045) with an NFL Event conditions are estimated to be approximately 34,650 passengers, similar to the proposed Project. Additionally, daily traffic volumes would decrease along key travel corridors such as Prairie Avenue, Manchester Boulevard

<sup>8</sup> 11,516 minus 464 in numbers of jobs displaced.

and Century Boulevard, thereby reducing congestion and improving travel conditions on a system-wide basis.

Similar to the proposed Project, Alternative 4 would result in operational benefits. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur similar in magnitude to those estimated for the proposed Project. This alternative is estimated to result in ITC ridership similar to the proposed Project. Improved traffic flows and reduction in congestion along key travel corridors, similar to those associated with the proposed Project would occur with Alternative 4.

### 13. Tribal Cultural Resources

The proposed Project would have a less than significant impact on Tribal Cultural Resources (TCRs). No TCRs were identified in the records around the Project site and no sensitive resources were identified. Nonetheless, the Project as proposed would include construction which would have the potential to unearth subsurface resources not previously identified. Given the level of urban development in Inglewood, the likelihood of unearthing TCRs is low but it is still a possibility. The 4<sup>th</sup> station alternative would have a similar impact to TCRs as the proposed Project since extensive construction and excavation of soil would be required to construct the ATS structure and the 4<sup>th</sup> station. Similar impacts to the TCRs would result from the proposed Project and Alternative 4.

### 14. Utilities and Service Systems

The 4<sup>th</sup> station would be located along the guideway within the public right-of-way along Manchester Boulevard. Under Alternative 4, no additional properties would need to be acquired and no additional demolition of buildings and site improvements would be required. As such impacts related to the construction or relocation of water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities would be similar to the proposed Project.

### *Relationship to Project Objectives*

The 4<sup>th</sup> Station Alternative would meet all of the City's objectives for the proposed Project since the proposed Project would still be built and reductions to daily traffic volumes along key roadway corridors and reductions to VMTs on an average weekday basis with event would occur similar in magnitude to those associated with the proposed Project.

## 5.5.5 Alternative 5: Prairie Avenue Single Station Alternative

### 1. Aesthetics

Under Alternative 5, the proposed Project would not result in significant impacts to the aesthetic character of the community during construction or operation with implementation of the project design

features in the ITCCCP and Design Guidelines. Similarly, Alternative 5 would travel down the same alignment with the same proposed and elevated guideway across the frontage of the buildings on Market Street. No additional impacts on the visual character of downtown would result from the consolidation and relocation of the single station along Prairie Avenue.

## 2. Air Quality

Under Alternative 5, the proposed Project would be built but the two proposed stations along Prairie Avenue would be consolidated into a single station that would be located adjacent to the City's Civic Center site. The construction of a single station along Prairie Avenue instead of two stations would result in less construction activities compared to the proposed Project. Similar to the proposed Project, Alternative 5 would not conflict with implementation of the applicable air quality plans or exceed thresholds established by the SCAQMD for criteria air pollutants. Moreover, Alternative 5 would implement similar mitigation measures as the proposed Project and would reduce construction air quality emissions.

Operation of a single station along Prairie Avenue instead of two stations would slightly decrease operational air quality emissions. However, under Alternative 5, mobile operational benefits would be less than those associated with the proposed Project. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur, but approximately 15 percent less in magnitude than those associated with the proposed Project. As such, operational air quality emissions associated mobile sources would increase compared to the proposed Project.

## 3. Biological Resources

Approximately 502 trees which may require removal during construction of the proposed Project exist along the proposed Project alignment. With Alternative 5, no additional properties would need to be acquired and no additional demolition of buildings or site improvements would be required. The guideway would still be constructed along the same segment of Prairie Avenue compared to the proposed Project. As such, Alternative 5 would not require an increase or decrease in tree removals or disturbance of nesting raptors or migratory birds. As such, impacts to biological resources during construction would be similar compared to the proposed Project. Similar to the proposed Project, operation of Alternative 5 would not diminish the chances for long-term survival of bird species or their habitats and no additional tree and/or ornamental vegetation removals would be planned. As such, Alternative 5 would result in similar operational impacts compared to the proposed Project.

## 4. Cultural Resources

Alternative 5 would have a less than significant impact on cultural resources, similar to the proposed Project. The consolidated and relocated station on Prairie Avenue would have no impact and would not be located near any identified historical resources. As such, impacts to cultural resources would be similar for Alternative 5 and the proposed Project.

## 5. Energy Resources

Under Alternative 5, the proposed Project would be built but the two proposed stations along Prairie Avenue would be consolidated into a single station that would be located adjacent to the City's Civic Center site. Construction of a single station in place of two stations would result in an incremental decrease of energy resource consumption for electricity and petroleum-based fuels associated with operation of the station.

Operation of a single station along Prairie Avenue instead of two stations would also slightly decrease operational energy resource consumption. However, under Alternative 5, mobile operational benefits would be less than those associated with the proposed Project. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur, but approximately 15 percent less in magnitude than those associated with the proposed Project. As such, Alternative 5 would result in an increase in petroleum-based fuel consumption compared to the proposed Project.

## 6. Geology and Soils

Under Alternative 5, the proposed Project would be built but the two proposed stations along Prairie Avenue would be consolidated into a single station that would be located adjacent to the City's Civic Center site. Impacts related to geology and soils conditions, including paleontological resources, and potential to conflict with an emergency evacuation plan, would be similar to those described for the proposed Project. Geology and soils conditions that would be encountered in construction of Alternative 5 would be the same as with the proposed Project. The Potrero Fault lies approximately one-quarter mile to the east of the project study area; however, compliance with the California Building Code would avoid the creation of seismic hazards. Ground-disturbing activity and the potential for accidental discovery of paleontological resources would continue to be potentially significant under Alternative 5 and would require the same mitigation measures as identified for the proposed Project in order to reduce the impact to less than significant.

## 7. Greenhouse Gas Emissions

The construction of a single station along Prairie Avenue instead of two stations would result in a reduction in the level of construction activities compared to the proposed Project. As such Alternative 5 would reduce construction related GHG emissions.

Operation of a single station along Prairie Avenue instead of two stations would also slightly decrease GHG emissions resulting from operation of the stations. However, under Alternative 5, mobile operational benefits would be less than those associated with the proposed Project. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur, but approximately 15 percent less in magnitude than those associated with the proposed Project. However, similar to the proposed Project, Alternative 5 would be consistent with the CARB 2017 Scoping Plan Update, SCAG 2020-2045 RTP/SCS, the ECAP, and General Plan which sets goals to reduce GHG emissions by increasing energy efficiency and improving transit infrastructure. Nonetheless, operational GHG emissions associated mobile sources would increase compared to the proposed Project.

## 8. Hazards and Hazardous Materials

While construction of a single station along Prairie Avenue instead of two stations would result in a reduction in the level of construction activities compared to the proposed Project, construction impacts under Alternative 5 would be similar to those of the proposed Project. Construction of the guideway and stations in conjunction with the MSF and PDS substations would still involve the demolition of existing buildings, which may have the potential release hazardous materials, such as ACMs, LBP, and other potentially hazardous building materials. Furthermore, excavations of potentially contaminated soils may occur during construction of Alternative 5 as a result of prior uses on some of the sites, similar to the proposed Project. Similar to the proposed Project, construction activities under Alternative 5 would likely cause the temporary closure of travel lanes, roadway segments, and sidewalks along the elevated guideway and stations within the street rights-of-way.

Under Alternative 5, operation would include the use and storage of hazardous materials typical of those used in an industrial setting, similar to the proposed Project. Alternative 5 would not interfere or impair with the City's ability to increase public awareness or make any improvements to emergency services and warning systems during operation. With adherence to the federal, State, and local safety requirements, Alternative 5 would not conflict with the requirements of an emergency response plan or emergency evacuation plan, similar to the proposed Project. As such, operational impacts under Alternative 4 would be similar when compared to the proposed Project.

## 9. Land Use and Planning

Alternative 5 would involve building and operating an ATS system similar to the proposed Project while consolidating the two proposed stations on Prairie Avenue to one single station adjacent to the Civic Center Site on Prairie Avenue. The proposed Project would not physically divide the community with its elevated guideways and maintenance of existing roadway capacity and roadway connections. Alternative 5 would have a similar alignment and elevated guideways similar to the proposed Project. As such, Alternative 5 would also maintain the existing roadway capacity and roadway connections. Alternative 5 would have a similar impact on physically dividing the community as the proposed Project.

Alternative 5 would be generally consistent with the existing plans, policies and guidelines in the City and the greater region. Alternative 5 would include the same amendments to the Land Use Element, Circulation Element, Safety Element, Environmental Justice Element, and the Inglewood Municipal Code as the proposed Project to incorporate the ATS into the language of the existing plans, policies, and guidelines within the City. As such, the policy consistency impacts of Alternative 5 would be similar to the proposed Project.

## 10. Noise and Vibration

The construction of a single station along Prairie Avenue instead of two stations would result in a reduction in the level of construction activities compared to the proposed Project. For this reason, Alternative 5 would reduce construction related noise and vibration levels.

Operation of a single station along Prairie Avenue instead of two stations would also slightly decrease operational noise and vibration levels. However, under Alternative 5, mobile operational benefits would be less than those associated with the proposed Project. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur, but approximately 15 percent less in magnitude than those associated with the proposed Project. As such, operational noise and vibration impacts associated mobile sources would increase compared to the proposed Project.

## 11. Population, Employment, and Housing

The proposed Project would have no direct impact on housing as the proposed Project does not include the construction or demolition of any housing units. The proposed Project would impact existing employment opportunities in the City as commercial uses that would be displaced by the proposed Project are estimated to be approximately 464 jobs. However, the proposed Project would result in a net increase of for approximately 11,052<sup>9</sup>FTE jobs through the Greenhouse Gas Reduction Funds, as estimated by the

<sup>9</sup> 11,516 minus 464 in numbers of jobs displaced.

Job Co-Benefits calculation (see **Section 4.11 Population, Employment, and Housing**). The number of jobs that will be supported by the proposed Project in the region is within the projected regional trends in the SCAG 2020-2045 RTP/SCS data and the jobs that will benefit from the proposed Project will not directly translate into additional population growth in the region. As such the proposed Project would have a less than significant impact on inducing employment and population growth.

Alternative 5 would have a similar effect on the population and employment trend as the ATS would be constructed as planned. Alternative 5 would have a similar impact to the population, employment, and housing resource as compared to the proposed Project.

## 12. Transportation

Under Alternative 5, the proposed Project would be built but the two proposed stations along Prairie Avenue would be consolidated into a single station that would be located adjacent to the City's Civic Center site. The proposed Project modifies and relocates Prairie Avenue to the east to maintain the current roadway capacity. This relocation in conjunction with the need for a passenger station connection to the sidewalk/ground level affects properties located east of Prairie Avenue. Alternative 5 avoids affecting these properties by consolidating the two proposed stations along Prairie Avenue into a single station that would be located adjacent to the Intermodal Transit Facility at the City's Civic Center site. This alternative maintains Prairie Avenue within its existing right-of-way; however, one to two lanes would be lost reducing the capacity of the roadway. Specifically, one travel lane in each direction along the Prairie Avenue roadway between Arbor Vitae and La Palma, one lane in the southbound direction between La Palma and Pincay Drive, and one lane in each direction between Pincay Drive and Manchester Boulevard would be lost under Alternative 5.

Under Alternative 5, operational benefits would be less than those associated with the proposed Project. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur, but approximately 15 percent less in magnitude than those associated with the proposed Project. Alternative 5 is estimated to result in transit ridership equivalent to approximately 75 percent of the transit ridership associated with the proposed Project. However, due to a reduction in capacities along Prairie Avenue, traffic flow and congestion in the surrounding area would be worse under Alternative 5 compared to the proposed Project.

## 13. Tribal Cultural Resources

The proposed Project would have a less than significant impact on Tribal Cultural Resources (TCRs), No TCRs were identified in the records around the Project site and no sensitive resources were identified. Nonetheless, the Project as proposed would include construction which would have the potential to

unearth subsurface resources not previously identified. Given the level of urban development in Inglewood, the likelihood of unearthing TCRs is low but it is still a possibility. Alternative 5 would result in similar potential impacts to TCRs as the proposed Project since excavation of soil would be required to construct the ATS system along the proposed alignment, including a single station on Prairie Avenue. Similar impacts to the TCRs are anticipated for the proposed Project and Alternative 5.

## 14. Utilities and Service Systems

The proposed Prairie station under Alternative 5 would be located within the City's Civic Center site. The guideway would still be constructed along the same segment of Prairie Avenue compared to the proposed Project. As such, impacts related to the construction or relocation of water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities would be similar compared to the proposed Project.

### Relationship to Project Objectives

Alternative 5 would meet, or partially meet, most of the City's objectives for the proposed Project. Alternative 5 would reduce the City's traffic congestion and alleviate growing demand on the existing roadway network, although to a slightly lesser degree than the proposed Project. Specifically, the Prairie Avenue Single Station Alternative would result in a reduction in capacities along Prairie Avenue, and traffic flow and congestion on a system-wide basis would be increased compared to those estimated for the proposed Project. However, several of the City's objectives would be met to the same extent as under the proposed Project. For example, by eliminating one of the stations, Alternative 5 would not meet the objective of encouraging intermodal transportation systems by providing convenient, reliable time-certain transit to the same degree as would the proposed Project. Eliminating a station would also not meet the objective of providing convenient access to businesses, and to connect the City by providing transit within safe and accessible walking distances to the same degree as would the proposed Project.

## 5.5.6 Alternative 6: Maintenance and Storage Facility Relocation Alternative

### 1. Aesthetics

The proposed Project would not result in significant impacts to the aesthetic character of the community during construction or operation with implementation of the project design features in the ITC CCP and Design Guidelines. Similarly, Alternative 6 would travel down the same alignment with the same proposed and elevated guideway across the frontage of the buildings on Market Street. No additional impacts on the visual character of downtown would result from moving the MSF to the northwestern portion of the Vons site closest to the south corner of Hillcrest Boulevard and Manchester Boulevard.

## 2. Air Quality

Construction under Alternative 6 would be similar to the proposed Project. During construction, the proposed Project would not exceed the significance threshold for any criteria pollutant after mitigation, and impacts would be less than significant. Similar to the proposed Project, Alternative 6 would not conflict with implementation of the applicable air quality plans and would not exceed thresholds established by the SCAQMD for criteria air pollutants.

Operational impacts associated with Alternative 6 would be similar to the proposed Project as the ATS would be built as proposed. Moreover, reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis with event would occur similar in magnitude to those associated with the proposed Project. As such, Alternative 6 would result in similar operational impacts compared to the proposed Project.

## 3. Biological Resources

Approximately 502 trees which may require removal during construction of the proposed Project exist along the proposed Project alignment. With Alternative 6, no additional properties would need to be acquired and no additional demolition of buildings or site improvements would be required. As such, impacts to biological resources during construction would be similar compared to the proposed Project. Similar to the proposed Project, operation of Alternative 6 would not diminish the chances for long-term survival of bird species or their habitats and no additional tree and/or ornamental vegetation removals would be planned. As such, Alternative 6 would result in similar operational impacts compared to the proposed Project.

## 4. Cultural Resources

Alternative 6 would have a less than significant impact on cultural resources, similar to the proposed Project. The relocated MSF on the northwest portion of its site would have no impact on cultural resources and would not be located near any identified historical resources. For this reason, impacts to cultural resources would be similar for Alternative 6 and the proposed Project.

## 5. Energy Resources

Energy demand from construction activities under Alternative 6 would be similar to the proposed Project as the ATS would be built as proposed. Reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis would occur similar in magnitude to those associated with the proposed Project. As such, Alternative 6 would result in similar operational impacts compared to the proposed Project.

## 6. Geology and Soils

Impacts related to geology and soils conditions, including paleontological resources, would be similar to those identified for the proposed Project. Geology and soils conditions that would be encountered in construction of Alternative 6 would be the same as with the proposed Project. The Potrero Fault lies approximately one-quarter mile to the east of the project study area; however, compliance with the California Building Code would avoid the creation of seismic hazards. Ground-disturbing activity and the potential for accidental discovery of paleontological resources would continue to be potentially significant with Alternative 6. Alternative 6 would implement similar measures as the proposed Project to mitigate the potential impacts on paleontological resources to less than significant.

## 7. Greenhouse Gas Emissions

Construction under Alternative 6 would be similar to the proposed Project and would result in a similar level of GHG emissions. Reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis would occur similar in magnitude to those associated with the proposed Project. Therefore, similar to the proposed Project, Alternative 6 would be consistent with the CARB 2017 Scoping Plan Update, the SCAG 2020-2045 RTP/SCS, the ECAP, and General Plan which sets goals to reduce GHG emissions by increasing energy efficiency and improving transit infrastructure. Operational GHG impacts would be similar to the proposed Project.

## 8. Hazards and Hazardous Materials

Under Alternative 6, the MSF would be relocated to the northwestern portion of the Vons site. Construction under Alternative 6 would be similar to the proposed Project. Construction of the guideway and stations in conjunction with the MSF and PDS substations would involve the demolition of the existing building, which may have the potential release hazardous materials, such as ACMs, LBP, and other potentially hazardous building materials. Similar to the proposed Project, construction activities under Alternative 6 would likely cause the temporary closure of travel lanes, roadway segments, and sidewalks along the elevated guideway and stations within the street rights-of-way. Construction of Alternative 6, however, would not involve demolition of the existing gas station at the MSF site, thereby resulting in a slightly reduced potential for the potential release of hazardous materials.

Under Alternative 6, operation of the ATS would include the use and storage of hazardous materials typical of those used in an industrial setting, similar to the proposed Project. Alternative 6 would not interfere or impair with the City's ability to increase public awareness or make any improvements to emergency services and warning systems during operation. With adherence to the federal, State, and local safety requirements, Alternative 6 would not conflict with the requirements of an emergency response

plan or emergency evacuation plan, similar to the proposed Project. As such, operational impacts under Alternative 3 would be similar to the proposed Project.

### 9. Land Use and Planning

Alternative 6 would include the construction and operation of an ATS system similar to the proposed Project while moving the MSF along Hillcrest Boulevard between Manchester Boulevard and Nutwood Street. With this alternative the existing gas station on this property would be retained, but the existing commercial building containing the grocery store and other businesses would be demolished. Under the proposed Project a replacement Vons store would be constructed on the corner of Manchester Boulevard and Hillcrest Boulevard. Under Alternative 6, however, a replacement grocery store would not be provided on this site. Nevertheless, the community is served by other grocery stores and the loss of this store is not considered a significant land use impact for this reason.

The proposed Project would not create a physical division of the existing community as the ATS guideway and stations would be elevated and the existing configuration of travel lanes on Market Street, Manchester Boulevard and Prairie Avenue would be maintained.

Alternative 6 would be generally consistent with the existing regional and local land use plans and policies. Alternative 6 would require the same amendments to the Land Use Element, Circulation Element, Safety Element, Environmental Justice Element, and the Inglewood Municipal Code as the proposed Project to incorporate the ATS system into these plans and regulations.

### 10. Noise and Vibration

Construction under Alternative 6 would be similar to the proposed Project and would result in similar noise levels. Moreover, Alternative 6 would implement similar mitigation measures as the proposed Project to reduce construction noise and vibration impacts to less than significant. Alternative 6 would result in reductions to daily traffic volumes along key roadway corridors and VMT on an average weekday basis would occur similar in magnitude to those estimated for the proposed Project. As such, this alternative would result in similar roadway noise levels as the proposed Project. Neither this alternative or the proposed Project would result in significant noise and vibration impacts.

### 11. Population, Employment, and Housing

The proposed Project would have no direct impact on housing as the proposed Project does not include the construction or demolition of housing units. The proposed Project would impact existing employment opportunities in the City as commercial uses that would be displaced by the proposed Project are estimated to be approximately 464 jobs. However, the proposed Project would result in a net increase of

approximately 11,052<sup>10</sup> FTE jobs through the Greenhouse Gas Reduction Funds, as estimated by the Job Co-Benefits calculation (see **Section 4.11 Population, Employment, and Housing**). The number of jobs that will be supported by the proposed Project in the region is within the projected regional trends in the SCAG 2020-2045 RTP/SCS data and the jobs that will benefit from the proposed Project will not directly translate into additional population growth in the region. As such the proposed Project would have a less than significant impact on inducing employment and population growth.

Alternative 6 would result in the demolition of the existing Vons grocery store and other businesses on site (with the exception of the existing gas station). It is possible that these businesses might choose not to relocate, which would result in corresponding job losses. Overall, alternative 6 would maintain the existing population, employment, and housing trends within the City and the region. As such, Alternative 6 would not directly or indirectly substantially induce population in the City or the region. Employment support and would be similar to the proposed Project under Alternative 6.

### 12. Transportation

Construction under Alternative 6 would be similar to the proposed Project. The proposed Project and all of its components would be constructed and operate. The operation of the ATS would be the same as planned for the proposed Project.

Similar to the proposed Project, Alternative 6 would result in operational benefits. Reductions to daily traffic volumes along key roadway corridors and reductions to VMTs on an average weekday basis would occur similar in magnitude to those associated with the proposed Project. Additionally, this alternative is estimated to result in transit ridership similar to the proposed Project. Finally, Alternative 6 would provide similar operational benefits as those of the proposed Project relative to reduction in traffic congestion and improvement of traffic flows along key roadway facilities areawide.

### 13. Tribal Cultural Resources

The proposed Project would have a less than significant impact on Tribal Cultural Resources (TCRs), No TCRs were identified in the records around the Project site and no sensitive resources were identified. Nonetheless, the Project as proposed would include construction which would have the potential to unearth subsurface resources not previously identified. Given the level of urban development in Inglewood, the likelihood of unearthing TCRs is low but it is still a possibility. Relocating the MSF to the northwestern portion of the Vons site would not result in any additional impacts.

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<sup>10</sup> 11,516 minus 464 in numbers of jobs displaced.

**14. Utilities and Service Systems**

Construction and operation under Alternative 6 would be similar to the proposed Project. For this reason, impacts related to the construction or relocation of water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities would be similar compared to the proposed Project.

**Relationship to Project Objectives**

Alternative 6 would meet most of the City’s objectives since the proposed Project would still be built and reductions to daily traffic volumes along key roadway corridors and reductions to VMTs on an average weekday basis with event would occur similar in magnitude to those associated with the proposed Project. Alternative 6, however, would not meet the objective to encourage redevelopment and investment within the City in areas served by the Project to the same degree as would the proposed Project because Alternative 6 would not include replacement of the existing Vons grocery store on the MSF site.

**5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

An EIR is required to identify the Environmentally Superior Alternative from among the range of reasonable alternatives that are evaluated. CEQA Guidelines section 15126.6(e)(2) requires that an environmentally superior alternative be designated and states that if the Environmentally Superior Alternative is the No Project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

**Table 5.0-2: Alternatives Summary**, identifies the ability of the Alternatives to meet the Project Objectives.

**Table 5.0-2  
Alternatives Summary**

Project Objectives	Does the Alternative meet the Project Objectives?					
	Alternative 1 No Project	Alternative 2 Bus Rapid Transit System	Alternative 3 Market Street Promenade	Alternative 4 4th Station Alternative	Alternative 5 Prairie Single Alternative	Alternative 6 Maintenance and Storage Facility Alternative
1 Provide direct and convenient connection to the Metro regional transit system for local residents and the region to access the city’s new major employment, commercial, and activity centers;	No	Yes	Yes	Yes	Yes	Yes
2 Close the “last mile gap” to the regional transit system by providing Metro Line;	No	Yes	Yes	Yes	Yes	Yes
3 Provide sufficient transit connection capacity between the Metro regional transit system and the major activity centers to meet peak ridership demands to encourage transit as a travel mode choice;	No	Partial	Yes	Yes	Yes	Yes
4 Maintain existing roadway capacity;	Yes	Partial	Yes, except on Market Street	Yes	Yes, except on Prairie Ave	Yes
5 Reduce the City’s traffic congestion and alleviate growing demand on the existing roadway network on both major arterials and residential streets for both nonevent and event days	No	Partial	Yes	Yes	Partial	Yes
6 Encourage intermodal transportation systems by providing convenient, reliable certain transit	No	Yes	Yes	Yes	Yes	Yes
7 Increase transit mode split, reduce vehicle trips, and reduce per-capita vehicle miles traveled to the City’s major activity centers, with corresponding improvement in air quality, public health, and reductions in greenhouse gas emissions from transportation sources in accordance with the City’s goals, the SCAG 2020-2045 RTP/SCS, and State policies with respect to climate change and land use;	No	Yes	Yes	Yes	Yes	Yes
8 Support the ongoing economic revitalization, including through the creation of public parking facilities;	No	Partial	Yes	Yes	Yes	Yes
9 Encourage redevelopment and investment within the City in areas served by the proposed Project;	No	Yes	Yes	Yes	Yes	Partial
10 Provide safe, reliable, and convenient access to businesses in the City so that they are accessible to their workforce and customers;	No	Yes	Yes	Yes	Yes	Yes
11 Connect the Inglewood community and citizens to jobs, education, services, and destinations within the City and within the region by providing transit within safe and accessible walking distances; and	No	Yes	Yes	Yes	Yes	Yes
12 Support regional efforts to become more efficient, economically strong, equitable, and sustainable.	No	Yes	Yes	Yes	Yes	Yes

## 5.0 Alternatives

Of the alternatives evaluated in this Recirculated Draft EIR, the Environmentally Superior Alternative is considered to be Alternative 2, the Bus Rapid Transit (BRT) System Alternative. The Project would not result in any significant impacts and, for this reason, Alternative 2 would not avoid any significant impact that would result from the Project as proposed. Alternative 2 is considered the Environmentally Superior Alternative because it would lessen impacts to the greatest degree of the alternatives evaluated. The BRT System Alternative would, however, not meet the City's basic objectives for the proposed Project.

With the BRT System Alternative, the proposed Project would not be constructed. No demolition or construction activities would occur, except along the public right-of-way where BRT-only lanes along the route are implemented. The BRT System Alternative would avoid all significant construction related effects and impacts identified for the proposed Project.

Unlike the No Project Alternative, the BRT System Alternative would meet some of the City's objectives including providing a direct and convenient connection to the Metro regional transit system, encouraging intermodal transportation systems by providing convenient transit, and providing safe, reliable, and convenient access to businesses in the City. The BRT System Alternative would also meet the City's objectives to support the ongoing economic revitalization, growth opportunities within the Downtown TOD Plan area, and encourage redevelopment and investment within the City in areas served by the proposed Project. The BRT System Alternative would not, however, create additional public parking to support ongoing economic revitalization efforts. The proposed Project would create additional public parking facilities in three locations along the proposed Alignment. In addition, the objective to provide sufficient transit connection capacity between Metro's regional transit system and the City's new major activity centers would not be met by this BRT alternative, resulting in limited increased transit mode split, limited reduction in vehicle trips, and consequently, limited reduction in per-capita vehicle miles traveled to the City's major activity centers. The estimated daily BRT ridership with Event Conditions would be approximately 20 percent of the projected ridership for the proposed ATS, providing transit options, increasing transit mode split, reducing vehicle trips, and reducing per capita vehicle miles traveled to the City's major activity centers. The BRT System Alternative would also not meet the City's objectives to maintain existing roadway capacity, reduce the City's traffic congestion and alleviate growing demand on the existing roadway network on both major arterials and residential streets for both nonevent and event days.

## 6.0 OTHER ENVIRONMENTAL CONSIDERATIONS

### 6.1 INTRODUCTION

California Environmental Quality Act (CEQA) Guidelines section 15126<sup>1</sup> requires that all phases of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. Further, CEQA Guidelines section 15126.2(a) requires that the evaluation of significant impacts consider direct and reasonably foreseeable indirect effects of the proposed Project over the short-term and long-term. The Environmental Impact Report (EIR) must identify (1) significant environmental effects that cannot be avoided if the proposed Project is implemented, (2) significant irreversible environmental changes that would result from implementation of the proposed Project, (3) effect found not to be significant, and (4) growth-inducing effects of the proposed Project.

### 6.2 SIGNIFICANT UNAVOIDABLE IMPACTS

CEQA Guidelines section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. The proposed Project would not result in significant environmental impacts with implementation of the mitigation measures identified in this Recirculated Draft EIR.

### 6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Under CEQA, an EIR must evaluate the extent to which the Proposed Project primary and secondary effects would generally commit future generations to the allocation of nonrenewable resources and to irreversible environmental damage. Specifically, CEQA Guidelines section 15126.2(d)<sup>2</sup> states:

*Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

The evaluation below addresses whether the proposed Project would result in significant irreversible environmental changes if they would:

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1 CEQA Guidelines sections 15126.2(a), (c-e).  
2 EQA Guidelines sections 15126.2(d).

## 6.0 Other Environmental Considerations

- Involve a large commitment of nonrenewable resources;
- Result in primary or secondary impacts that would generally commit future generations to similar uses;
- Involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- Result in consumption of resources that is not justified (e.g., the project involves the wasteful use of energy).

Each of these issues is discussed below for the proposed Project.

### Commitment of the Project for Future Generations

Development of the proposed Project would result in the commitment of the Project area to a transit use along with accompanying support facilities uses, thereby precluding other uses for the lifespan of the proposed Project, a period of time anticipated to be at least 50 years.

### Irreversible Environmental Damage

The CEQA Guidelines also require a discussion of the potential for irreversible environmental damage that could be caused by an environmental accident associated with the proposed Project. While the proposed Project could result in the use, transport, storage, and disposal of limited amounts of hazardous wastes during construction and operation, all activities would comply with applicable State and federal laws related to hazardous materials, which significantly reduce the likelihood and severity of the occurrence of accidents that could result in irreversible environmental damage.

Over the past decade, the understanding of global climate change and the role that communities can play in mitigating and/or adapting to it has grown tremendously. There is broad scientific consensus that recent changes in climatic conditions, including increases in global temperatures, are associated with corresponding increases of greenhouse gases (GHGs). Temperature increases are beginning to affect regional climates and continued increases are expected result in impacts to the southern California region and the world. Climate change is anticipated to have profound implications for the availability of the natural resources on which economic prosperity and human development depend.

Greenhouse Gas Emissions, the emission of GHGs is known to have long-term effects on atmospheric conditions that affect the global climate, with resultant changes in sea level, hydrological conditions in rivers, heat island effects, and a range of other conditions. While these changes are not considered irreversible, they could last for generations. The proposed Project could result in short-term increases in GHG emissions during construction, but through the implementation of mitigation measures identified in

## 6.0 Other Environmental Considerations

this Draft EIR, the construction-related GHG emissions would be reduced. Operation of the proposed Project would result in a decrease in GHG emissions as it would provide for the conversion of vehicles trips in the area to ridership on the ATS trains. As such, the proposed Project would not contribute to global climate changes and related irreversible environmental damage.

### Unjustified Consumption of Resources

Resources that would be permanently and continually consumed by implementation of the proposed Project include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would not result in the unnecessary, inefficient, or wasteful use of resources.

### Project Construction

As shown in **Table 4.5-3** and **Table 4.5-4** in **Section 4.5: Energy Resources**, a total of approximately 165,115 kWh of electricity and 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 is estimated to be consumed during construction of the proposed Project. Construction activities do not typically involve the consumption of natural gas, as construction equipment and staging rely heavily on electricity and transportation fuels. Accordingly, natural gas would likely not be needed to support construction activities; thus, there would be little to no demand generated by construction.

Construction of the proposed Project would result in the irretrievable commitment of construction materials (e.g., steel products, cement, glass). While construction of the proposed Project would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment, the consumption of fossil fuels would occur on a temporary basis during the construction period.

Construction of the proposed Project would employ fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations in accordance with the California Air Resources Board (CARB) Pavley Phase II standards, the anti-idling regulation in accordance with section 2485 in Title 13 of the (CCR), and fuel requirements for stationary equipment in accordance with section 93115 (concerning Airborne Toxic Control Measures) in Title 17 of the CCR. Use of construction equipment that is compliant with these regulations would result the use of more fuel-efficient engines and associated fuel savings.

The proposed Project would divert mixed construction and demolition debris to City-certified construction and demolition waste processors using City-certified waste haulers, which would reduce truck trips to landfills, and increase the amount of waste recovered (e.g., recycled, reused, etc.) at material recovery

facilities, thereby further reducing transportation fuel consumption. As such, the consumption of energy during project construction would not be wasteful, inefficient, or unnecessary.

### Project Operation

Operation of the Proposed Project would result in the demand for electricity and natural gas for project operations, and gasoline and diesel fuel for transportation and backup generation functions.

As shown in **Table 4.5-6** in **Section 4.5**, the electricity demand for the proposed Project during normal operation would result in a net increase of 20,625,176 kWh (20.6 GWh) per year. In the event the MSF PDS is unable to operate, the electricity demand would result in a net increase of 20,789,426 kWh (20.8 GWh) per year. In the event the Prairie Avenue/Hardy Street station PDS is unable to operate, the electricity demand would result in a net increase of 22,109,996 kWh (22.1 GWh) per year.

As shown in **Table 4.5-7** in **Section 4.5**, the proposed Project would result in a net decrease of 4,561,725 kBTU of natural gas per year.

As shown in **Table 4.5-9** in **Section 4.5**, implementation of the proposed Project would reduce annual petroleum-based fuel under all scenarios. Specifically, under the Adjusted Baseline scenario, the proposed Project would reduce annual fuel consumption from 45,338,712 gallons to 44,754,415 gallons, a decrease of 584,297 gallons. Under the Future (2027) Non-Event scenario, the proposed Project would reduce annual fuel consumption from 47,071,377 gallons to 46,448,809 gallons, a decrease of 622,567 gallons. Under the Future (2027) All Event scenario, the proposed Project would reduce annual fuel consumption from 50,876,477 gallons to 49,507,575 gallons, a decrease of 1,368,902. Under the Future (2045) Non-Event scenario, the proposed Project would reduce annual fuel consumption from 43,780,331 gallons to 43,199,383 gallons, a decrease of 580,949 gallons. Under the Future (2045) All Event scenario, the proposed Project would reduce annual fuel consumption from 47,000,246 gallons to 45,620,737 gallons, a decrease of 1,379,509 gallons.

Additionally, the proposed Project would include up to two stationary standby generators with an estimated total capacity rated at approximately 4,000 kilowatts (kW) to provide emergency power primarily for lighting and other emergency building systems. The estimated annual fuel usage assuming each generator operates of 50 hours per year (2 hours per day) is 27,440 gallons of diesel fuel.<sup>3</sup>

Operation of the proposed Project would comply with all applicable building codes, including the 2019 Title 24 building energy efficiency standards, CAFE fuel economy standards, consistency with the SCAG

<sup>3</sup> Vender Specifications for Standby Generator, [https://www.cat.com/en\\_US/products/new/power-systems/electric-power.html](https://www.cat.com/en_US/products/new/power-systems/electric-power.html). Accessed October 2021.

2020-45 RTP/SCS, compliance with the County's Low Impact Development (LID) Development Standards Manual, compliance with the City's Low Impact Development Requirements for New Development and Redevelopment, the City's Green Street Policy, the City's Water Conservation and Water Supply Shortage Program, as well as mitigation measures included in this Draft EIR, would ensure that natural resources are used efficiently and conserved to the maximum extent possible. Further, it is expected that, over time, new technologies or systems will emerge, or will become more cost-effective or user-friendly, to further reduce the reliance upon nonrenewable natural resources. For example, future implementation of the Clean Fuel Standard and the Renewable Portfolio Standard are expected to decrease the use of nonrenewable fossil fuels.

Collectively, the incorporation of the above described conservation measures and features, operation of the proposed Project would minimize the consumption of electricity, natural gas, and transportation fuels. Therefore, as proposed operation of the proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of electricity, natural gas, and transportation fuels, and thus would not result in the unjustified consumption of natural resources.

### 6.4 EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the CEQA Guidelines<sup>4</sup> requires that an EIR "contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and therefore were not discussed in detail in the EIR."

The Original Initial Study (Original IS) was published in July 2018 and determined that an EIR would be prepared in compliance with CEQA to analyze potentially significant impacts that may result from the Project. As such, an Original Notice of Preparation (Original NOP) was circulated and comments were received from the public and agencies following a 30-day comment period that ended on August 15, 2018.

As a result of the comments received and refinements and modifications to proposed Project identified in the Original NOP and Original IS, a Revised NOP and IS were circulated. Subsequent to the circulation of the Original IS, the State of California Office of Planning and Research (OPR) updated and revised the thresholds contained in the State CEQA Guidelines Appendix G.<sup>5</sup> The Revised IS was updated to address the updated Appendix G checklist that became effective on December 28, 2018. The following analysis is based on the Revised Initial Study (Revised IS) recirculated on September 10<sup>th</sup>, 2020.

<sup>4</sup> California Environmental Quality Act (CEQA) Guidelines, Section 15128.  
<sup>5</sup> California Environmental Quality Act (CEQA) Guidelines, Appendix G.

Impacts determined by the Initial Study to be potentially significant, as well as included in this Draft EIR are addressed in detail in **Section 4.0: Environmental Impact Analysis**. The discussion below presents the analysis of the effects related to specific thresholds for the impacts identified in the Revised Initial Study that were not found to be significant. All impacts for the issues discussed in this section would be less than significant or have no impact.

#### 6.4.1 Aesthetics

Except as provided in Public Resources Code Section 21099, would the Project:

**Threshold:** Have a substantial adverse effect on a scenic vista?

A significant impact regarding a scenic vista could occur if the proposed Project were to introduce incompatible visual elements within a field of view containing a scenic vista or substantially blocked views of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest). Scenic resources typically include natural open spaces, topographic formations, and landscapes that contribute to a high level of visual quality. They also can include ridgelines, parks, trails, nature preserves, sculpture gardens, and similar features.

The proposed Project would include an elevated guideway for the ATS system that would be located along segments of 3 major streets in Inglewood; Market Street, Manchester Boulevard and Prairie Avenue. The proposed alignment would extend from a point near the under-construction Metro K Line, which will run south along North and South Market Street, east along East Manchester Avenue, and south along South Prairie Avenue before terminating near the intersection of South Prairie Avenue and Hardy Street.

The proposed Project is located entirely within the City in a highly developed urban area characterized by commercial, residential, and industrial uses. The existing level of development on the site and in the surrounding area limits views across and beyond the site from surrounding roadways. The City's General Plan states that no forest resources, wildlife, fisheries, shorelines, or agricultural land are present in the City,<sup>6</sup> nor does the General Plan designate any scenic vistas within the City or its vicinity. Additionally, the proposed Project is not near any designated wild or scenic rivers pursuant to the National Wild and Scenic Rivers System.<sup>7</sup> The nearest surrounding mountains, the Santa Monica Mountains, are more than 10 miles

<sup>6</sup> City of Inglewood, General Plan, "Conservation Element" (1997), 1.

<sup>7</sup> National Wild and Scenic Rivers System, <https://www.rivers.gov>. Accessed October 2021.

to the north.<sup>8</sup> No views of these mountains or of any other focal points or broad panoramic view corridors are available from public rights-of-way along the proposed Project.

Based on the above, the proposed Project would not have a substantial adverse effect on a scenic vista. Impacts would be less than significant.

**Threshold:** Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

A significant impact would occur if the proposed Project were to substantially damage identified scenic resources bordered by or within the viewshed of a State-designated scenic highway.

There are no designated scenic highways near the proposed Project. In addition, although the City Municipal Code (IMC) has a tree protection ordinance that requires any street trees affected by project implementation be replaced at a 1:1 ratio, the appended tree inventory does not identify any federally or State-listed trees that would be affected by proposed Project's implementation. None of the trees inventoried is located within a State scenic highway. Historic buildings located in the vicinity of the proposed Project also do not fall within a State scenic highway, and no rock outcroppings are present on or near the proposed Project. As such, impacts would be less than significant.

#### 6.4.2 Agricultural and Forestry Resources

Would the proposed Project:

**Threshold:** Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?

Significant impacts would occur if the proposed Project were to adversely impact Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The location of the proposed Project is surrounded by commercial, commercial recreation, single- and multifamily residential, and entertainment uses (within the Hollywood Park Specific Plan).

According to the California Department of Conservation's Farmland Mapping and Monitoring Program, the location of the proposed Project has not been previously mapped.<sup>7</sup> However, the City is highly developed and entirely urbanized; no portion of the City, including the proposed Project location and

<sup>8</sup> Google Maps <https://www.google.com/maps>. Accessed October 2021.

surrounding development, is currently in agricultural use. As such, no portion of the proposed Project's location would qualify for designation as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance. No impacts would occur.

**Threshold: Conflict with existing zoning for agricultural use, or Williamson Act contract?**

Significant impacts would occur if the proposed Project were to conflict with existing agricultural zoning or a Williamson Act contract.

As previously noted, the proposed Project's location and surrounding development are not used for agricultural, nor can they support agricultural use. The area is not subject to a Williamson Act contract. No impacts would occur.

**Threshold: Conflict with existing zoning for, or cause rezoning of, forestland (as defined in PRC section 12220(g)), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**

The proposed Project's location is not designated or zoned for forest or timberland. No timber operations exist in the area. Additionally, the area is highly urbanized area and is not within any forestland area. No impacts would occur.

**Threshold: Would the Project result in the loss of forest land or conversion of forest land to non-forest use?**

As previously noted, the proposed Project's location does not contain any farmland or forestland. Development of the proposed Project would occur in an existing highly urbanized and developed area. No impacts would occur.

**Threshold: Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to nonagricultural use, or conversion of forestland to nonforest use?**

The proposed Project's location is not designated or zoned for forest or timberland. No timber operations exist in the area. Additionally, the area is highly urbanized area and is not within any forestland area. No impacts would occur.

### 6.4.3 Air Quality

Would the proposed Project:

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

Impacts would be considered potentially significant if the proposed Project were to result in the creation of objectionable odors with the potential to affect substantial numbers of people, or if construction or operation of the proposed Project would result in the creation of nuisance odors that would be noxious to a substantial number of people as codified in South Coast Air Quality Management District (SCAQMD) Rule 402 (Nuisance).<sup>9</sup>

Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills.

During construction, activities associated with the operation of equipment, the application of asphalt, and the application of architectural coatings and other interior and exterior finishes may produce discernible odors typical of most construction sites. As construction-related emissions dissipate from the area, odors associated with these emissions would also decrease, dilute, and become unnoticeable.

According to the SCAQMD CEQA Air Quality Handbook, land uses that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting refineries, landfills, dairies, and fiberglass molding.<sup>10</sup> The proposed Project would not include any of these odor-producing uses. Odors associated with the proposed Project's operation would be limited to on-site waste generation and disposal, as well as cleaning operations at the MSF. All trash receptacles would be covered and properly maintained in a manner as to minimize odors, as required by City and Los Angeles County Health Department regulations and be emptied on a regular basis.<sup>11</sup>

Implementation of the proposed Project would not generate objectionable odors affecting a substantial number of people. Impacts related to odors would be less than significant.

<sup>9</sup> SCAQMD, "Rule 402: Nuisance" (adopted May 7, 1976), <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>. Accessed October 2021.

<sup>10</sup> SCAQMD, Air Quality Handbook, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>. Accessed October 2021.

<sup>11</sup> County of Los Angeles Department of Public Health, "Solid Waste Management Program," accessed July 2020, [http://publichealth.lacounty.gov/eh/EP/solid\\_waste/solid\\_waste\\_main.htm](http://publichealth.lacounty.gov/eh/EP/solid_waste/solid_waste_main.htm). Accessed October 2021.

#### 6.4.4 Biological Resources

Would the project:

**Threshold:** Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?

A significant impact would occur if the proposed Project were to lead to adverse effects on any species identified as a candidate, sensitive, or special status species according to any adopted plan, policy, or regulation. This includes effects caused by habitat modification.

The proposed Project is located entirely within a highly developed urban area characterized by commercial and residential uses. The proposed Project's location consists of paved and active streets with various landscaping, as well as developed or previously developed parcels where the MSF and PDS facilities may be located. The existing level of development in the area and in the surrounding area is not compatible with supporting wildlife and natural plant communities.

A biological assessment for the proposed Project's location was completed to determine the presence or absence of any sensitive biological resources. As part of the biological assessment, the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB)<sup>12</sup> was used to conduct a 9-quadrant survey. In the Inglewood quadrant, 29 species were previously identified as seen in **Table 6.0-1: CNDDDB Inglewood Quadrant Species List**.

There were no species listed on the CNDDDB that have been observed within the area of proposed Project. Fourteen of the species listed in **Table 6.0-1** were no closer than 1.89 miles from the proposed Project. The only plant species on site were landscaping as well as weeds and ruderal vegetation. Of these species, none listed is a candidate, sensitive, or special-status species. None of the species listed in the CNDDDB was found to be present within or surrounding the proposed Project during the field survey on May 23, 2018.

The sensitive species listed in quadrants are not within the proposed Project's footprint. The species listed tend to only occur in specific habitats that do not present within the City; suitable habitats for these species tend to occur in area beyond the City, such as the Santa Monica Mountains to the northwest and the coastal regions to the west. The proposed Project area is completely urbanized and has no natural open space natural plant communities.

12 California Department of Fish and Wildlife (CDFW), California Natural Diversity Database (CNDDDB), "Maps and Data," <https://www.wildlife.ca.gov/Data/CNDDDB>. Accessed October 2021.

**Table 6.0-1**  
**CNDDDB Inglewood Quadrant Species List**

Scientific Name	Common Name	Distance to Proposed Project (miles)
<i>Spea hammondi</i>	Western spadefoot	Unprocessed
<i>Nycticorax</i>	Black-crowned night heron	Unprocessed
<i>Ammodramus savannarum</i>	Grasshopper sparrow	Unprocessed
<i>Spizella breweri</i>	Brewer's sparrow	Unprocessed
<i>Agelaius tricolor</i>	Tricolored blackbird	3.06 SE
<i>Setophaga petechia</i>	Yellow warbler	Unprocessed
<i>Athene cunicularia</i>	Burrowing owl	4.19 NE
<i>Poliptila californica</i>	Coastal California gnatcatcher	2.01 NW
<i>Empidonax traillii eximus</i>	Southwestern willow flycatcher	4.19 NE
<i>Vireo bellii pusillus</i>	Least Bell's vireo	4.59 NE
<i>Bombus crotchii</i>	Crotch bumble bee	Not Present on-site
<i>Eumops perotis californicus</i>	Western mastiff bat	1.89 SE
<i>Nyctinomops femorosaccus</i>	Pocketed free-tailed bat	Unprocessed
<i>Microtus californicus stephensi</i>	South coast marsh vole	2.01 NW
<i>Taxidea taxus</i>	American badger	4.19 NE
<i>Lasionycteris noctivagans</i>	Silver-haired bat	Unprocessed
<i>Anniella stebbinsi</i>	Southern California legless lizard	Unprocessed
<i>Phrynosoma blainvillii</i>	Coast horned lizard	5.70 S
<i>Eryngium aristulatum var. parishii</i>	San Diego button-celery	2.12 SW
<i>Centromadia parryi ssp. australis</i>	Southern tarplant	Not Present on-site
<i>Lasthenia glabrata ssp. coulteri</i>	Coulter's goldfields	0.77 NE
<i>Atriplex coulteri</i>	Coulter's saltbush	4.44 SE
<i>Astragalus tener var. titi</i>	Coastal dunes milk-vetch	0.77 NE
<i>Sidalcea neomexicana</i>	Salt spring checkerbloom	3.07 NW
<i>Camissoniopsis lewisii</i>	Lewis' evening-primrose	Unprocessed
<i>Hordeum intercedens</i>	Vernal barley	Unprocessed
<i>Orcuttia californica</i>	California Orcutt grass	3.69 SW
<i>Navarretia fossalis</i>	Spreading navarretia	On site
<i>Navarretia prostrata</i>	Prostrate vernal pool navarretia	Not Present on-site

Source: CNDDDB

Notes: NE = Northeast; S = South; SE = Southeast; SW = Southwest; Unprocessed = Data for species has not been uploaded to CNDDDB for mapping—cannot determine distance.

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The proposed Project is not located in a significant ecological area defined in the County of Los Angeles (the County) General Plan.<sup>13</sup> Moreover, the City's General Plan states that no forest resources, wildlife, fisheries, shorelines, or agricultural land are present in the City.<sup>14</sup>

Impacts would be less than significant.

**Threshold:** Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?

Significant impacts would occur if the proposed Project were to cause adverse effects on any riparian habitat or other sensitive natural community identified in an adopted plans, policies, or regulations.

The proposed Project is located in an area that consists of paved rights-of-way, as well as developed or previously developed urban parcels adjacent to the proposed Project. As such, no riparian habitat or sensitive natural community is located in the area.<sup>15</sup> In addition, the proposed Project is not located in a significant ecological area defined in the County's General Plan<sup>16</sup> or the City's General Plan.<sup>17</sup>

No impacts would occur.

**Threshold:** Have a substantial adverse effect on State or federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

A significant impact would occur if the proposed Project were to adversely affect federally protected wetlands under Section 404 of the Clean Water Act.

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 US Army Corps of Engineers or the CDFW. The National Wetlands Mapper does not show any federally protected streams, wetlands, or other water bodies, or any riparian habitat on site or adjacent to the proposed Project.<sup>18</sup>

13 Los Angeles County, Department of Regional Planning (LA County DRP), General Plan 2035, "General Plan Update Program— Interactive Map (GP-NET)," <http://planning.lacounty.gov/gpnet>. Accessed October 2021.  
14 City of Inglewood, General Plan, "Conservation Element" (1997).  
15 CDFW, CNDDDB, "Maps and Data."  
16 LA County DRP, General Plan 2035, "General Plan Update Program—Interactive Map (GP-NET)."  
17 City of Inglewood, General Plan, "Conservation Element."  
18 US Fish and Wildlife Service (USFWS), National Wetlands Inventory, "National Wetlands Mapper," <https://www.fws.gov/wetlands/data/mapper.html>. Accessed October 2021

6.0 Other Environmental Considerations

Because the proposed Project would not have any effect on federally protected wetlands, and would not result in any removal, filling, hydrological interruption, or other means of disruption to a watercourse, no impact would occur.

**Threshold:** Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan?

Significant impacts would occur if the proposed Project were to conflict with a Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or another approved plan designed to conserve habitat.

No adopted HCP, NCCP, or similar plan applies to the proposed Project's area.<sup>19</sup> Consequently, implementation of the proposed Project would not conflict with the provisions of any adopted conservation plan and therefore no impacts would occur.

6.4.5 Geology and Soils

Would the proposed Project:

**Threshold:** Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Significant impacts would occur if the proposed Project were to expose people or structure to the effects of liquefaction.

Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: shallow groundwater; low-density, fine, clean sandy soils; and strong ground motion. The effects of liquefaction can include sand boils, settlement, and bearing-capacity failures below structural foundations.

According to the CGS, the location of the proposed Project is not within an area susceptible to liquefaction.<sup>20</sup> Based on previous investigations and available geologic data, liquefaction zones are not mapped or known to exist beneath the proposed Project.

19 CDFW, "NCCP Plan Summaries," <https://www.wildlife.ca.gov/conservation/planning/nccp/plans>. Accessed October 2021.  
20 CDC, CGS, Earthquake Zones of Required Investigation, interactive map, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed October 2021.

The following materials were consulted regarding potential liquefaction for the proposed Project:<sup>21</sup>

- Mapped liquefaction areas on the Inglewood Quadrangle,
- The City of Los Angeles Safety Element, and
- The County of Los Angeles Seismic Safety Element.

Based on a review of the above, it was determined that the proposed Project is not located within areas identified as having a potential for liquefaction according to these source materials. Furthermore, the regional geologic map and subsurface conditions reported in previous geotechnical investigations, and the absence of shallow groundwater, the Pleistocene age sediments underlying the proposed Project (generally dense silty sand and firm silty clay silts) are not considered prone to liquefaction. Therefore, the potential for liquefaction and its secondary effects are considered low and a Project area-specific study in accordance with the Seismic Hazards Mapping Act<sup>22</sup> will not be required. The design and construction of the proposed Project would conform to California Building Code requirements related to seismic standards, as approved by the City Building Safety Division.

Impacts related to seismic related liquefaction would be less than significant.

**Threshold:** **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?**

Significant impacts would occur if the proposed Project were to expose people or structures to adverse impacts associated with landslides.

The proposed Project is located on level terrain. Based on the topographic setting and a review of previous geotechnical evaluations in the proposed Project's vicinity, no historical landslides are known to have occurred that could potentially impact the proposed Project. According to the CGS,<sup>23</sup> the proposed Project is not located within an Earthquake-Induced Landslide Zone as shown on the Earthquake Zones of Required Investigation, Inglewood Quadrangle map. The probability of seismically induced landslides occurring within the area of the proposed Project is not significant due to the general lack of elevation difference in slope geometry across or adjacent to the site. In addition, development of the proposed Project would not substantially alter the existing topography of the area.

<sup>21</sup> Inglewood Transit Connector, Technical Memorandum (DRAFT), Geology and Soils, Geosyntec Consultants, June 25, 2018.

<sup>22</sup> 2018 California Code, Public Resources Code – PRC, Division 2 – Geology, Mines and Mining, Chapter 7.8, Seismic Hazards Mapping, Section 2690, Seismic Hazards Mapping Act.

<sup>23</sup> California Department of Conservation, California Geological Survey, DC, CGS, Earthquake Zones of Required Investigation.

As such, no impacts related to slope instability or landslides would occur.

**Threshold:** **Result in substantial soil erosion or the loss of topsoil?**

Significant impacts would occur if the proposed Project were to result in substantial soil erosion or the loss of topsoil.

The location of the proposed Project has been substantially developed with impermeable surfaces with only small areas of vegetative planters, and no areas of the site are susceptible to erosion under existing conditions. The area is highly urbanized and developed; the land is relatively flat and contains minimal rises or changes in elevation. No major slopes or bluffs are on or adjacent to the site. Although development of the proposed Project has the potential to result in the erosion of soils during construction activities, erosion would be reduced through implementation of SCAQMD Rule 403—Fugitive Dust to minimize wind- and waterborne erosion.

The proposed Project's construction would temporarily expose on-site soils to surface water runoff. Compliance with construction-related best management practices (BMPs), as detailed in a Storm Water Pollution Prevention Plan (SWPPP), would control, and minimize erosion and siltation. Appropriate erosion control BMPs may include but are not limited to silt fencing, fiber rolls, sandbag barriers, gravel bag berms, stabilized construction site entrances/exits, and any other practices laid out in the City's Low-Impact Development (LID) Standards Manual.<sup>24</sup> Following construction activities, treated runoff would be directed into existing storm drains that receive surface water runoff under existing conditions, and runoff would not encounter unprotected soils.

Because the proposed Project is greater than 1 acre in size, the proposed Project will implement a SWPPP in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site specific SWPPP would be prepared prior to earthwork activities and would be implemented during the proposed Project's construction. The SWPPP would include BMPs and erosion control measures to prevent pollution in stormwater discharge. Typical BMPs that could be used during construction include good housekeeping practices (e.g., street sweeping; proper waste disposal; vehicle and equipment maintenance; concrete washout area; materials storage; minimization of hazardous materials; proper handling and storage of hazardous materials; etc.) and erosion- and sediment-control measures (e.g., silt fences, fiber rolls, gravel bags, stormwater inlet protection, soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City.

<sup>24</sup> IMC, ch. 10, Public Works, art. 16, LID Standards Manual, incorporated by reference.

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The proposed Project's construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet-weather erosion control plan if construction occurs during the rainy season. Through compliance with these existing regulations, the proposed Project would not result in any significant impacts related to soil erosion during the construction phase.

During the proposed Project's operational phase, the proposed Project's surface areas would be developed with impervious surfaces, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. In addition, no native topsoil is present on the site because it has been previously disturbed and developed. Therefore, soil erosion impacts associated with construction and operation of the proposed Project would not occur, and soil erosion impacts would be less than significant.

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

Significant impacts would occur if the proposed Project were based on unstable soils that could result in landslides, lateral spreading, subsidence, liquefaction, or soil collapse.

Subsidence and ground collapse generally occur in areas with active groundwater withdrawal or petroleum production. The extraction of groundwater or petroleum from sedimentary source rocks can cause the permanent collapse of the pore space previously occupied by the removed fluid. The proposed Project does not involve the creation of new groundwater wells, nor are there active groundwater activities in the vicinity of the proposed Project.<sup>25</sup>

According to the California Energy Management Division (CalGEM) (formerly the Division of Gas and Geothermal Resources (DOGGR)), the area of the proposed Project is not located within the limits of any existing or former oil fields.<sup>26</sup> The area does not contain existing oil production wells, and no plugged or abandoned oil exploration wells are known to be located within the proposed Project area. The closest known oil production well is located approximately 1,00 feet east of Prairie Avenue and is categorized as

<sup>25</sup> Los Angeles County Public Works. Groundwater Wells. <https://dpw.lacounty.gov/general/wells/>. September 1, 2020.

<sup>26</sup> California Division of Gas and Geothermal Resources (DOGGR), Well Finder, <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.32073/33.94064/15>. Accessed October 2021.

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"idle."<sup>27</sup> Therefore, while there is some history of oil extraction in the area, no oil extraction occurs or is known to have historically occurred within the area of the proposed Project.

Subsidence and ground collapse can also occur during dewatering activities. However, dewatering is not necessary for the proposed Project. US Geological Survey groundwater measurements indicate that nearby groundwater is at least 85 feet below grade. Given that the proposed Project does not include substantial excavation or subterranean structures, groundwater would not be encountered during construction. The proposed Project's design features and construction would comply with all applicable building codes and standards.

A site-specific geotechnical study would be performed by a licensed engineer that would outline structural design elements to ensure structural integrity is maintained and account for site specific soil conditions. In addition, the design and construction of the proposed Project would conform to California Building Code requirements related to site specific soil conditions, as approved by the City Building Safety Division.

With adherence to existing regulations, impacts related to geological failure—including lateral spreading, off-site landslides, liquefaction, or collapse—would be less than significant.

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

Significant impacts could occur if the proposed Project were located on expansive soil that could create substantial risks to life or property.

Expansive soils include clay minerals characterized by their ability to undergo significant volume change (shrink or swell) due to variation in moisture content. Sandy soils are generally not expansive, while clayey soils generally are expansive. Changes in soil moisture content can result from rainfall, irrigation, pipeline leakage, perched groundwater, drought, or other factors. Volumetric change of expansive soil may cause excessive cracking and heaving of structures with shallow foundations, concrete slabs-on-grade, or pavements supported on these materials.

Soil materials in the area tend to include: (1) artificial fill, consisting primarily of silty sand and sand with silt and gravel; (2) alluvial deposits consisting of sand, gravel, and cobbles; and (3) alluvial deposits consisting of silty sand, sand, silty clay, and sandy clay. Typically, sandy soils have a low expansion potential

<sup>27</sup> California Division of Gas and Geothermal Resources (DOGGR), Well Finder, <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.32073/33.94064/15>. Accessed October 2021.

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while clayey soils can have a high expansion potential. The predominance of granular content in the soils in the area including gravels, sands, and cobbles indicate a generally low potential for expansive soils.

A site-specific geotechnical study would be performed by a licensed engineer that would outline structural design elements to ensure structural integrity is maintained and account for site specific soil conditions. In addition, the design and construction of the proposed Project would conform to California Building Code requirements related to site specific soil conditions, as approved by the City Building Safety Division.

The proposed Project would incorporate standard construction practices to maintain the integrity of the proposed Project's structures. Additionally, the proposed Project's design features and construction would comply with all applicable building codes and standards. With adherence to existing regulations, impacts related to expansive soils would be less than significant.

**Threshold: Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

The proposed Project would result in significant impacts if it were located on soils incapable of supporting septic tanks or other alternative systems in the event that the proposed Project were not connected to existing sewer systems.

The proposed Project is located in a highly urbanized area where wastewater infrastructure is currently in place. The proposed Project would connect to the City's existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. Thus, the proposed Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.

No impacts would occur.

#### 6.4.6 Hazards and Hazardous Materials

Would the proposed Project:

**Threshold: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

##### Construction

During construction activities, excavation of soil impacted with petroleum hydrocarbons or dry-cleaning solvents or other contaminants may be encountered. In addition, common construction materials, such

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as fuels, paints, oils, transmission fluids, solvents, and other acidic and alkaline solutions, would be utilized. The potential encounter and usage of contaminants and hazardous materials would require special handling, transport, and disposal. Hazardous materials used during construction would typically be packaged in consumer quantities with handling instructions from the manufacturers. Manufacturer instructions will be followed during required usage of hazardous materials to minimize the risk of exposure to workers and the environment.

In addition, the construction of the MSF and PDSs will necessitate the demolition of existing structures. Demolition activities have the potential to release hazardous materials, such as asbestos containing materials (ACM), lead-based paint (LBP), and other potentially hazardous building materials in some form such as polychlorinated biphenyl, mercury, or chlorofluorocarbons found in fluorescent lighting and electrical switches. Potential exposure to hazardous materials during demolition will be limited only to the duration of demolition activities. Prior to demolition, existing buildings are required to be inspected for the presence of hazardous materials, including asbestos containing materials, lead based paint, polychlorinated biphenyl (PCB) materials and mercury.

The identification, removal, and disposal of ACM is regulated under 8 CCR 1529 and 5208. The identification, removal, and disposal of LBP is regulated under 8 CCR 1532.1. A State-certified professional would be required to conduct all work related to the identification, removal, and disposal of both ACM and LBP. If either ACM or LBP are found, a site-specific hazard control plan must be prepared and submitted to the appropriate agency detailing removal methods and specific instructions for protective clothing and equipment for abatement personnel. A State-certified LBP and an asbestos removal contractor would be retained to conduct the appropriate abatement measures and be retained for the removal of the hazardous material in compliance with all federal, State, and local laws and regulations. Once all abatement measures have been implemented and the hazardous material has been removed, a written documentation will be submitted to the City.

The identification, removal, and disposal of PCBs is regulated by the EPA under the Toxic Substances Control Act<sup>28</sup> and 22 CCR 66263.44. Electrical transformers and older fluorescent light ballasts, along with other suspect material will need to be tested and verified for PCB content prior to demolition. If PCBs are detected above action levels, a material must be disposed of at a licensed facility permitted to accept the materials. The identification, removal, and disposal of PCBs must follow all federal, State, and local laws and regulations. Upon completion of abatement measures, the contractor will submit written documentation to the City.

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28 Title 40, Chapter 1, Subchapter R, Part 761

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All hazardous material identification, removal, and disposal activities will be carried out in accordance with all federal, State, and local laws and regulations in combination with enforcement mechanisms by agencies including SCAQMD and Cal/OSHA. Compliance with applicable laws and regulations will minimize the potential for exposure of individuals and the environment to hazards during the construction, demolition, and disposal process.

The transport of hazardous material is regulated by US Department of Transportation, Caltrans, and the California Highway Patrol. The enforcement agencies have established driver-training requirements, load labeling requirements, and container specifications designed to minimize the exposure of hazardous materials. Manchester Boulevard and Prairie Avenue are major roadways along the elevated guideway that are designated truck routes.<sup>29</sup> These routes are permitted for use by any vehicle exceeding a maximum gross weight of 3 tons and includes the routine transport of hazardous materials by such trucks. While hazardous materials, with some exceptions, can be transported on all City roadways, Section 31303 of the California Vehicle Code and US Department of Transportation regulations require that hazardous materials be transported by routes with the least overall travel time, ensuring that freeways and major boulevards are primarily used for the transport of hazardous materials. Prior to the commencement of construction, haul routes will be reviewed and approved of by the City.

Additionally, the NPDES General Construction Permit described above in **Section 4.6: Geology and Soils**, would include the submittal of a SWPPP, identifying various BMPs and other measures, including proper material storage, prevention, and containment of accidental spills of hazardous materials and wastes, to ensure hazardous materials are contained. All materials will also be stored, handled, transported, and disposed of in accordance with all applicable local, State, and federal regulations. Therefore, the proposed Project would not create a significant impact related to routine transport, use, or disposal of hazardous materials during construction. Impacts would be less than significant.

**Operation**

The types and amounts of hazardous materials that would be used in connection with operation of the proposed Project, including along the elevated guideway and at the stations, but particularly at the MSF, would be typical of those used in an industrial setting (e.g., cleaning solutions, solvents, pesticides for landscaping, painting supplies, and petroleum products used in normal vehicle fleet operations, coolants, absorbents, oil and fuel products, and machining wastes). All potentially hazardous materials would be used and stored in accordance with applicable federal, State, and local regulations, and the proposed Project would comply with planning and emergency response regulations pertaining to the presence of

<sup>29</sup> IMC, ch. 3, Motor Vehicles and Traffic, art. 3, Truck Route Regulations, sec. 3-85, Truck Routes Established (1985).

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such materials. The potential for a significant hazardous impact to occur during operation of the proposed Project is considered low. Impacts would be less than significant.

**Threshold: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

Significant impacts would occur if the proposed Project were located on a site that is included on a list of hazardous materials sites.

California Government Code Section 65962.5 requires various State agencies, including but not limited to the Department of Toxic Substances Control (DTSC) and the State Water Resources Control Board (SWRCB), to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis.<sup>50</sup> The State of California maintains the Hazardous Waste and Substances Site List, also known as the Cortese List, as a planning document that assists Lead Agencies with CEQA compliance as it relates to hazardous materials and sites.

Section 65962.5(a)(1) requires that DTSC “shall compile and update as appropriate, but at least annually, and shall submit to the Secretary for Environmental Protection, a list of all the following: (1) [a]ll hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code (HSC).” The hazardous waste facilities, identified in HSC Section 25187.5, are those where DTSC has taken or contracted for corrective action because a facility owner/operator has failed to comply with a date for taking corrective action in an order issued under HSC Section 25187, or because DTSC determined that immediate corrective action was necessary to abate an imminent or substantial endangerment.

No portions of the of the proposed Project are currently on the active Cortese list of sites compiled pursuant to Government Code Section 65962.5. Any site that was within the area of the proposed Project areas that were previously on the Cortese list has been sufficiently remediated to meet DTSC, SWRCB, and other agency requirements, and no longer pose a significant hazard to the public and the environment. Therefore, impacts would be less than significant.

**Threshold:** For a project located within an airport land use plan or, where such plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the Project area?

A significant impact would occur if the proposed Project were located in an airport land use plan or within 2 miles of a public airport and would result in a safety hazard as a result of that location.

The proposed Project is not subject to the Los Angeles County Airport Land Use Plan, which was adopted in December 1991 and revised in December 2004. Los Angeles International Airport (LAX) is located more than 2 miles southwest of the proposed Project, and the Hawthorne Municipal Airport is located approximately 1.5 miles south of the proposed Project. The proposed Project is not located near a private airstrip.

Airport operation hazards include incompatible land uses or features such as power transmission lines, wildlife hazards, and tall structures that can interfere with aircraft operations. The proposed Project would not construct any buildings or structures to a height that would interfere with or obstruct any local airport operations. Therefore, impacts would be less than significant.

**Threshold:** Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Significant impacts would occur if the proposed Project were to expose people or structures to significant risks associated with wildland fires.

The City is highly developed and entirely urbanized and is without an urban/wildland interface. The proposed Project is not within a Moderate, High, or Very High Fire Hazard Severity Zone as designated by CAL FIRE. As such, the proposed Project would not increase or create the potential for wildland fires to occur near the proposed Project. No impacts would occur.

### 6.4.7 Hydrology and Water Quality

Would the proposed Project:

**Threshold:** Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

A significant impact would occur if project discharges (either urban or stormwater runoff) to surface water or groundwater were to violate the conditions of any of the guiding federal, State, regional, or local requirements.

#### Construction

During construction, the proposed Project could disturb areas that require development outside of the transportation rights-of-way, including excavation, site preparation, and infrastructure improvements. Removing existing pavement, importing/exporting soil, grading, and stockpiling could potentially result in soils being exposed, loosened, and transported by stormwater to downstream receiving waters. Additional pollutants, including oil and grease, metals, and pH-altering materials, may also be introduced to the receiving water(s) during the construction phase. However, to reduce the potential for the above impacts during the construction phase, the proposed Project will comply with the SWRCB Construction General Permit (CGP). Under the CGP, the proposed Project will prepare an approved SWPPP and implement construction BMPs. The CGP will be enforced through the City's construction, grading, and excavation permitting process.

Therefore, impacts related to water quality standards and waste discharge requirements during the construction phase would be less than significant.

#### Operation

The proposed Project's elevated guideway is located within existing transportation rights-of-way. The proposed Project component would be constructed on impervious surfaces. The proposed Project structures would also be constructed in compliance with the applicable City's and County's Municipal Separate Storm Sewer System (MS4) Permits and LID Ordinance requirements to address any potential pollutant or pollutant loading impacts.

The proposed MSF site has nearly fully impervious surfaces with the exception of a few landscape areas. The MSF site would be constructed in full compliance with the City's and County's MS4 Permits and LID Ordinance requirements to address any potential pollutant or pollutant loading impacts.

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The proposed Project is located over the West Coast Basin, which is a confined aquifer, and is located approximately 220 ft below the ground surface. Urban and stormwater runoff infiltrated on site is unlikely to reach this groundwater aquifer. As a result, even if infiltration BMPs are incorporated into the proposed Project as required LID measures, such BMPs would extend to such a depth as to enter the basin. Therefore, infiltrated runoff would be unlikely to cause adverse impact to the local groundwater quality. Any potential impacts would be reduced to acceptable levels with implementation of infiltration BMPs.

Therefore, impacts related to surface water and groundwater quality standards and waste discharge requirements during both the construction and operations phases would be less than significant.

**Threshold:** Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?

A significant impact would occur if the proposed Project were to substantially deplete groundwater or interfere with groundwater recharge.

**Construction**

The proposed Project's water supply needs during the construction phase will be provided by the City's municipal system (MS4). There would be no impact on groundwater supplies during the construction phase of the proposed Project. Because the underlying water basin is a confined aquifer, and the water table is located approximately 50 to 200 feet below ground surface, dewatering is not anticipated during the construction phase.

Therefore, impacts related to groundwater supply depletion during the construction phase would be less than significant.

**Operation**

The proposed Project could result in increased demand of potable and nonpotable water from proposed Project operation and addition of commercial sites. The proposed Project's water supply during the operation phase will be provided by the City, which depends on a combination of extracted groundwater from City-owned wells and potable and nonpotable water purchased from WBMWD.

However, according to the City's 2015 Urban Water Management Plan Update (UWMP), the City cannot meet increased water demand through an increase in groundwater extraction due to limitations in water rights. Therefore, projected demands are anticipated to be met through a combination of conservation of

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local surface water, imported water, graywater, stormwater capture, ocean desalination, and/or other nongroundwater sources.

Impacts related to groundwater supply depletion during the operation phase would be less than significant.

**Threshold:** Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site?

- i. Result in substantial erosion or siltation on or off site;
- ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
- iv. Impede or redirect flood flows?

A significant impact could occur if the proposed Project were to substantially alter the drainage pattern of an existing stream or river such that substantial erosion or siltation would result.

**Construction**

No existing surface streams or rivers pass within the proposed Project's extent. The nearest open channel is Centinela Creek, approximately 1.3 miles downstream of the proposed Project. In the existing condition, stormwater runoff is collected in curbs, gutters, and inlets, and conveyed through the storm drain network. No topographic changes are proposed as part of the proposed Project. If the construction phase of the proposed Project results in increased runoff or any modifications to existing drainage patterns, the existing stormwater facilities will be analyzed in the context of the proposed additional flow and upgraded if needed.

Activities during construction may expose and/or loosen soils, potentially resulting in erosion and topsoil loss. The average slopes of the proposed Project extents within the Ballona Creek and Dominguez Channel Watersheds were 0.5 and 0.9 percent, respectively. Because the slopes in the proposed Project extents are relatively flat, the majority of soil disturbance is expected to be related to importing and exporting of soil, grading, and stockpiling. All potential impacts related to these activities are expected to be reduced

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to acceptable levels under the CGP-required SWPPP. The SWPPP will identify any potential sources of sedimentation during construction and detail required BMPs to reduce or eliminate erosion and/or any potential alterations to drainage patterns. BMPs may include silt fencing, fiber rolls, sandbag barriers, gravel bag berms, and/or stabilized construction site entrances/exits. A Qualified SWPPP Practitioner will ensure compliance with the SWPPP by conducting regular monitoring and inspections of construction activities.

Any storm drain upgrades required to address increases in peak flow or runoff volumes would be made as part of the proposed Project's drainage design. BMPs as required by the SWPPP and the MS4 Permit would preclude any additional sources of polluted runoff during both construction and operations.

Therefore, impacts related to the creation or contribution of runoff water exceeding the capacity of existing or planned stormwater drainage systems, or providing substantial additional sources of polluted runoff, during both the construction and operation phases would be less than significant.

No streams or rivers run within the proposed Project's location. The proposed Project does not propose any changes to existing drainage patterns. During construction, BMPs (required and monitored under the SWPPP) would be used to reduce the volume and velocity of stormwater runoff, thereby mitigating the potential for flooding due to construction. Any accumulated sediment observed during inspection of temporary BMPs or permanent stormwater network devices would be removed to prevent flooding. The proposed Project is located outside the 100-year Federal Emergency Management Agency (FEMA) flood hazard area.<sup>30</sup>

Impacts related to altering the existing drainage pattern of the proposed Project's structural and support facilities that would result in erosion or siltation during the construction phase would be less than significant.

**Operation**

No topographic changes or altered drainage patterns are currently proposed as part of the proposed Project, and any increases in runoff would be handled through compliance with MS4 Permit requirements.

Surface drainage will continue to be collected via the storm drain network to be ultimately conveyed to Ballona Creek and Dominguez Channel. Should the proposed Project result in increased runoff or peak flows, the existing stormwater facilities will be analyzed in the context of the proposed additional flow and

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<sup>30</sup> County of Los Angeles, Department of Public Works, Flood Zone Determination Website, <http://dpw.lacounty.gov/floodzone/>.

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upgraded if needed. In the proposed condition, stormwater runoff would not encounter unprotected soils within landscaped areas.

The proposed Project will not modify the existing drainage patterns and would address any increases in runoff through compliance with the MS4 Permits and upgrades to existing stormwater infrastructure, if needed.

Impacts related to altering the existing drainage pattern of the area of the proposed Project that would result in erosion or siltation during the operation phase would be less than significant.

**Threshold: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

A significant impact would occur if the proposed Project were located within an area susceptible to flooding because of the failure of a levee or dam. A significant impact could occur if the proposed Project were located in an area subject to inundation by seiche, tsunami, or mudflow. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, or lake. A tsunami is a sea wave produced by a significant undersea disturbance. Mudflows result from the down-slope movement of soil and/or rock under the influence of gravity.

**Construction and Operation**

The proposed Project is located within FEMA unshaded Zone X, which is defined as an area outside the 0.2 percent annual chance floodplain. Further, the proposed Project is outside of the floodplain of any nearby flood control channel (Centinela Creek and Dominguez Channel). Any increase in peak flow or runoff volumes in the proposed condition would be addressed through compliance with the MS4 Permit and drainage system upgrade as part of the proposed Project.

The proposed Project is not located in any established tsunami inundation area, liquefaction zone, or landslide zone. The proposed Project is at least 1.3 miles away from any open water feature and, therefore, would not be subjected to seiche events. As stated above, the proposed Project proposed is relatively flat within both the Ballona Creek and Dominguez Channel Watersheds, and it is not adjacent to any exposed or steep grades.

Therefore, the proposed Project would have no impact related to exposing people or structures to loss, injury, or death involving flooding during either the construction or operational phases.

**Threshold:** Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

#### Construction

Regular construction activities have the ability to result in the degradation of water quality, most noticeably from erosion and sedimentation. Loose sediment itself may degrade water quality and has the capacity to carry such pollutants as heavy metals, nutrients, pathogens oil and grease, and fuels. Additionally, construction may expose the proposed Project's location and stormwater to trash, solvents, paint, etc. The CGP requires the implementation of BMPs to eliminate or reduce the discharge of pollutants in stormwater discharges and prohibits the discharge of nonstormwater from construction sites because these nonstormwater discharges are likely to carry pollutants to receiving waters. The BMPs detailed in the SWPPP will minimize potential for impacts from erosion and sedimentation during construction. The SWPPP will also detail use of BMPs to minimize the potential for spills of toxic or hazardous chemicals or substances into surface or ground waters.

Impacts related to otherwise substantially degrading water quality during the construction phase would be less than significant.

#### Operation

The Project will address proposed changes in land use, which often results in changes in pollutant contributions, through an analysis of the anticipated pollutant concentrations and loads under both the existing and proposed condition. Any projected increase in pollutant concentrations or loads will be addressed through compliance with the MS4 Permit, as well as site-specific BMPs to address any increases in pollutant concentrations or loads.

Impacts related to substantially degrading water quality during the operation phase would be less than significant.

### 6.4.8 Mineral Resources

Would the project:

**Threshold:** Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State?

Significant impacts would occur if the proposed Project's implementation would result in the loss of availability of a known mineral resource.

The proposed Project is located within a Mineral Resources Zone 3 (MRZ-3), which is an area where significant mineral deposits cannot be evaluated based on current and available data.<sup>31</sup> The State of California has not classified or designated mineral resource zones within the area, and the Bureau of Land Management mineral potential maps also indicate no prospective valuable deposits.<sup>32</sup>

In addition, the proposed Project is located entirely within a highly developed urban area characterized by commercial, industrial, and residential land uses. No records exist with respect to the presence of valuable mineral resources within the proposed Project's area or the immediate surrounding area, and no mining is currently taking place in the City.<sup>33</sup>

No impacts would occur.

**Threshold:** Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Significant impacts would occur if the proposed Project were to result in the loss of availability of a locally important mineral resource recovery site.

The proposed Project is located within MRZ-3 and, as such, information is not available to determine whether valuable mineral resources are deposited on site.

As mentioned above, the proposed Project is located entirely within a highly developed urban area characterized by commercial and residential uses and no mining operations are currently being conducted in the City. There are no records of valuable mineral resources within the proposed Project's footprint or the immediate surrounding area.<sup>34</sup>

No impacts would occur.

31 CDC, Division of Mines and Geology, Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California: Part II—Los Angeles County (1994), Plate 18, available at [ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR\\_94-14/OFR\\_94-14\\_Text.pdf](ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Text.pdf). Accessed October 2021.

32 CDC, CGS, Mineral Lands Classification, data portal, <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>. Accessed October 2021.

33 CDC, Division of Mines and Geology, Update of Mineral Land Classification of Portland Cement Concrete Aggregate, Plate 18.

34 LA County DRP, General Plan 2035, "General Plan Update Program—Interactive Map (GP-NET)."

### 6.4.9 Noise

Would the proposed Project:

**Threshold:** For a project within an airport land use plan or, where such a plan has not been adopted within 2 miles of a public airport or public use airport, would the Project expose people residing or working the Project area to excessive noise levels?

A significant impact would occur if the proposed Project were to expose people residing or working in the proposed Project area to excessive noise levels from a public airport or public use airport.

The Federal Aviation Administration (FAA) requires airports to prepare noise contour maps to assess the effects of aircraft noise to surrounding land uses. These maps can be used as an indicator of potential impacts. The closest airports to the proposed Project are the Hawthorne Municipal Airport (HHR), approximately 1.5 miles to the south, and Los Angeles International Airport (LAX), approximately 2 miles to the west of the proposed Project. Noise contours for the Hawthorne Municipal Airport remain confined within the runway of the airports and not within the proposed Project immediate area.<sup>35</sup>

The proposed Project is partially located within the Planning Boundary/Airport Influence Area for the LAX Airport, as designated within the Los Angeles County ALUP.<sup>36</sup> The proposed Project falls within the Airport Influence Area and Airport Compatibility Zone for LAX for the southern LAX runway. Portions of the proposed Project are within the 65 dBA CNEL noise contour. This includes a portion of the proposed Project located within street rights-of-way on E. Manchester Boulevard and Prairie Avenue. The proposed Project is not considered a noise sensitive use in and of itself; therefore, noise associated with LAX would not create any impacts. Further, according to the Los Angeles World Airports' Noise Contour Map for the first quarter of 2018, the proposed Project is not located within noise contours associated with LAX as determined by studies by Los Angeles World Airports.<sup>37</sup>

Therefore, the proposed Project would not expose people to excessive noise levels associated with airport uses. As such, impacts would be less than significant.

<sup>35</sup> LA County DRP, Hawthorne Airport: Airport Influence Area (May 13, 2003), [http://planning.lacounty.gov/assets/upl/project/aluc\\_airport-hawthorne.pdf](http://planning.lacounty.gov/assets/upl/project/aluc_airport-hawthorne.pdf).

<sup>36</sup> Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, adopted December 1991, <http://planning.lacounty.gov/view/alup/>

<sup>37</sup> Los Angeles World Airports, "Quarterly Noise Reports and Contour Maps," <https://www.lawa.org/en/lawaenvironment/noise-management/lawa-noise-management-lax/quarterly-noise-reports-and-contour-maps>.

### 6.4.10 Population, Employment, and Housing

Would the proposed Project:

**Threshold:** Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

A significant impact would occur if the proposed Project were to displace substantial numbers of existing housing. The proposed Project would be constructed entirely within the existing public rights-of-way along City streets except for the MSF and the PDSs. These features would be built on sites that are either currently vacant or being used for commercial or industrial purposes. As such, no housing would be displaced because of the proposed Project's implementation, and no impacts would occur. As noted above, portions of the proposed Project would be constructed and operated in areas that are proximate to residential uses. The proposed Project's elevated guideway and stations would be constructed almost entirely within existing public rights-of-way along existing City streets. The potential sites for the MSF and PDS facilities are either vacant or are currently occupied by nonresidential uses. The EIR will address whether the proposed Project may have an indirect effect on these uses as a result of noise or vibration.

In addition, the proposed Project is consistent with the City's General Plan and Downtown TOD Plan and will assist the City in achieving the goals of these plans by supporting economic development in areas located along the proposed alignment by providing an additional transit option and reducing congestion on streets throughout the City. The existing number of travel lanes and traffic capacity of these streets will be maintained. Access and circulation to existing businesses and residences located along the proposed alignment will be maintained at all times during construction and the ITC Construction Commitment Program includes program to support local businesses during construction including the provision of funding for temporary signage and advertising during construction to help businesses affected by construction.

The ATS guideway and stations will be located within the public right of way and designed in accordance with the ITC Design Standards and Guidelines (Design Guidelines) to ensure the Project is integrated into the streets it is located on in a complementary manner. For these reasons, it is not expected that the project will result in business closures or vacancies. If any commercial property vacancies occur along the proposed alignment, these vacancies are expected to be short term and would not result in changes to the character of the community that would result in physical impacts to the environment that would be significant.

### 6.4.11 Public Services

**Threshold:** Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

**i) Fire protection?**

The proposed Project would have a significant impact on fire protection if it were to require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. Services include fire suppression; hazardous materials protection; emergency medical treatment, including basic and advanced life support transportation; earthquake and fire safety planning; fire inspections; and building plan reviews.

The City is served by Battalion 20 within Division 6 of LACFD. Battalion 20 operates six stations in total; four of these serve the City (Fire Stations 170, 171, 172, and 173). Fire Station 171 is located approximately 0.25 miles west of the proposed Project at 141 W. Regent Street; Station 172 is approximately 0.7 miles north at 810 Centinela Avenue; Station 173 is approximately 1 mile east at 9001 S. Crenshaw Boulevard; and Station 170 is approximately 1.1 miles southeast at 10701 S. Crenshaw Boulevard. The stations are staffed in three rotating shifts (A, B, and C). A three-platoon schedule is based on 24-hour shifts that start at 8 AM. Standard company staffing is generally a minimum of 25 personnel per shift. An assistant deputy chief oversees each of the three divisions.

Although the proposed Project would help accommodate large numbers of persons attending events at adjacent sports and entertainment venues, these people would likely be in the proposed Project's vicinity due to events at LASED or proposed IBEC. The reduction in vehicle traffic that would directly result from the proposed Project's implementation could potentially reduce the amount of fire services required in the area. Therefore, implementation of the proposed Project would not represent an increase in the need for these services.

Impacts would be less than significant.

**ii) Police protection?**

The proposed Project would have a significant impact on police protection services if it were to require expanded police services in the area as a result of the proposed Project's implementation.

Law enforcement services in the City are provided by the Inglewood Police Department (IPD). IPD operates one police station that houses most of the department's offices, located adjacent to Inglewood City Hall at One Manchester Boulevard. The Office of the Chief of Police, the Patrol Bureau, the Detective Bureau, the Records Division, the Custody Division, and the pistol range are all located at the police station. The Communications Division is located in the basement of the station, known as the Emergency Operations Center. The offices for the Traffic Division, the Training Section, and the Personnel Section are located on the second floor of the City Hall Building. IPD has 186 sworn officers and approximately 92 civilian personnel. The department comprises three major offices: Administrative Services, Criminal Investigative Services, and Patrol Services.

Although the proposed Project would help accommodate large numbers of persons attending events at adjacent sports and entertainment venues associated with LASED and proposed IBEC, these people would likely be in the proposed Project's vicinity regardless of the proposed Project's implementation. The proposed Project would provide an alternative mode of transit for persons attending such events but would not result in greater attendance than would otherwise be expected to occur. Because the proposed Project would divert some attendees who would otherwise travel by private vehicle, the proposed Project will reduce vehicle traffic. The reduction in surface vehicle traffic could potentially reduce the amount of police services required in the area. Therefore, the implementation of the proposed Project would not increase the need for police services.

Impacts would be less than significant.

**iii) Schools?**

Significant impacts would occur if the Project were to necessitate the construction or expansion of schools in the proposed Project's area.

The proposed Project would not result in an increase in the number of residents; thus, there would be no increase in demand for school facilities. Because the proposed Project will primarily serve to accommodate persons attending one-day events at adjacent sports and entertainment venues, the construction or expansion of schools would not be required because of the proposed Project's implementation.

No impacts would occur.

**iv) Parks?**

Significant impacts would occur if the proposed Project were to result in a need for new or expanded parks facilities.

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The proposed Project would not result in an increase in the number of residents; thus, there would be no increase in demand for parks and recreational facilities. Because the proposed Project will primarily serve to accommodate persons attending one-day events at adjacent sports and entertainment venues, the construction or expansion of parks or recreational facilities would not be required because of the proposed Project's implementation.

No impacts would occur.

v) **Other public services?**

Significant impacts would occur if the proposed Project were to result in an increased need in public services other than those described above.

The proposed Project would not result in an increase in the number of residents; thus, there would be no increase in demand for other public services such as libraries. Because the Project will primarily serve to accommodate persons attending one-day events at adjacent sports and entertainment venues, the construction or expansion of library facilities would not be required because of the proposed Project's implementation.

No impacts would occur.

**6.4.12 Recreation**

Would the project:

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

Significant impacts would occur if the proposed Project were to result in an increased use of existing recreational facilities such that these facilities would need to be expanded or new ones constructed.

The proposed Project would primarily serve special events at the existing, under-construction, and proposed sports and entertainment venues associated with LASED. As such, most of ridership would use the proposed Project for events at those facilities and would not visit existing neighborhood or regional parks. In addition, weekday commuter ridership on nonevent days would not increase the use of neighborhood and regional parks.

No impacts would occur.

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**Threshold:** **Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?**

Significant impacts would occur if the proposed Project were to include recreational facilities or required the expansion or construction of existing residential facilities.

The proposed Project does not include recreational facilities. Because it will primarily serve to accommodate persons attending one-day events at adjacent sports and entertainment venues, the construction or expansion of recreational facilities would not be required because of the proposed Project's implementation.

**6.4.13 Utilities and Service Systems**

Would the proposed Project:

**Threshold:** **Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?**

A significant impact could occur if a project were to increase water consumption to such a degree that new water sources would need to be identified.

Water supply to the City is provided through WBMWD and the West Coast Groundwater Basin via City wells.<sup>38</sup> The City's UWMP concludes that Inglewood has sufficient existing water supplies so that a nonwater-intensive project, such as the one proposed, would not result in a strain on existing water supplies. Because water supplies in the proposed Project area are more than sufficient, impacts would be less than significant.

**Threshold:** **Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?**

A significant impact would occur if a project were to increase water consumption or wastewater generation to such a degree that the capacity of the existing facilities would be exceeded.

Water is provided to the proposed Project via WBMWD as well as City-owned wells. Wastewater generated by the proposed Project would be treated at the JWPCP.

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<sup>38</sup> City of Inglewood, Final Draft 2015 Urban Water Management Plan, <https://www.cityofinglewood.org/DocumentCenter/View/1061/2015-Urban-Water-Mangement-Plan-PDF?bidid=>

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Development of the proposed Project would not significantly increase the demand for water and wastewater treatment services within the City. The ATS trains are electrified systems; the operation of the trains would not require significant water resources because none of its constituent components is water dependent. In addition, activities at the MSF and PDS sites would not require additional water demands such that existing facilities would need expansion or new facilities constructed. The routine maintenance and storage of parts of the ATS trains at the MSF would not require significant amounts of water except for train washing. Activities that would take place at the MSF includes service activities to the ATS train cars, vehicle storage, loading platforms, and a paint booth. Although water and wastewater lines may need to be relocated, no aspect of the construction or operation of the proposed Project would require new or expanded water or wastewater treatment facilities.

Impacts would be less than significant

**Threshold: Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

A significant impact would occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste.

Solid waste services in the City are provided by Consolidated Disposal Service (CDS); trash collected in the City is taken to CDS's American Waste Transfer Station in the City of Gardena, where it is sorted; residual garbage is taken to the Consolidated Volume Transport Disposal and Recycling Center (CVT) in the City of Anaheim, and recycling and green waste is taken to CDS's Compton Transfer Station in the City of Compton.<sup>66</sup> Solid waste generated in the City is ultimately disposed of at various landfill facilities located throughout Los Angeles County.

The proposed Project would generate additional solid waste from construction debris, activities, and site preparation, as well as during operation of the proposed Project. Solid waste generated during construction and operation of the proposed Project would have to be separated and recycled. As described in Los Angeles County's most recent landfill disposal capacity report, a shortfall in permitted solid waste disposal capacity within the County is not anticipated to occur under forecasted growth and ongoing municipal efforts at waste reduction and diversion. The proposed Project would not drastically change the amount of solid waste disposal projected by the County due to the fact that the operations phase would generate minimal waste. Impacts would be less than significant.

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**Threshold: Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?**

A significant impact would occur if a project were to generate solid waste that was not disposed of in accordance with applicable regulations.

Assembly Bill (AB) 939 requires every city and county to divert 50 percent of its waste from landfills by the year 2000 through such means as recycling, source reduction, and composting.<sup>39</sup> In addition, AB 939 requires each county to prepare a countywide siting element for a 15-year period, specifying areas for transformation or disposal sites to provide capacity for solid waste generated in the county that cannot be reduced or recycled. Further, AB 1327, the California Solid Waste Reuse and Recycling Access Act of 1991, requires local agencies to adopt ordinances mandating the use of recyclable materials in development projects.<sup>40</sup>

The proposed Project would generate solid waste during both construction and operation that is typical of the development of a mechanical transportation system and industrial uses. This includes typical construction waste such as wood, concrete, and asphalt, as well as operational waste such as that collected from pedestrians and employees.

The proposed Project would fully comply with all federal, State, and local statutes and regulations regarding proper disposal. Impacts would therefore be less than significant.

**6.4.14 Wildfire**

If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:

**Threshold: Substantially impair an adopted emergency response plan or emergency evacuation plan?**

Significant impacts would occur if the proposed Project were to impair the implementation of an adopted emergency response or emergency evacuation plan.

The City is located in a fully developed urban area that is not associated with wildland fires. According to the Fire Hazard Severity Zone mapping done by the California Department of Forestry and Fire Protection, the proposed Project is located in an incorporated city that is considered to be in the Non Very High Fire

<sup>39</sup> CalRecycle, "Assembly Bill 939," <http://www.calrecycle.ca.gov/laws/legislation/calhist/1985to1989.htm>. Accessed October 2021.

<sup>40</sup> CalRecycle, "Ordinances, Resolutions, and Policies," <http://www.calrecycle.ca.gov/LGCentral/Library/LocalDocs/Policy.htm>. Accessed October 2021.

6.0 Other Environmental Considerations

Hazard Safety Zone (non-VHFHSZ).<sup>41</sup> The City is responsible for fire protection in the area, which is implemented in part by enforcement of the Fire Code requirements contained within the Building Code, as well as fire protection services provided by the City Fire Department.

As described in **Section 4.8: Hazards and Hazardous Materials**, the proposed Project is located largely within public rights-of-way. For this reason, construction activities associated with the proposed Project would likely cause the closure of travel lanes in streets along the elevated guideway. The City has planned evacuation routes that assume worst-case displacement and surface rupture from a seismic event in the region along the Newport-Inglewood Fault or Potrero Fault, as described in the Safety Element of the City's General Plan.<sup>42</sup>

However, the closure of lanes would be temporary and such closures would only be associated with the construction phase of the proposed Project. A Traffic Management Plan will be prepared to ensure that interference with area traffic is minimized. This would include ensuring that routes to the emergency room at the adjacent Centinela Hospital Medical Center would be maintained. The plan will require that emergency access be maintained throughout the proposed Project's construction. Therefore, the proposed Project's impacts on emergency response or evacuation plans would be less than significant.

**Threshold:** Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Significant impacts would occur if the proposed Project were to exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors.

The City is a fully developed urban area that is not associated with wildland fires. As mentioned previously, the proposed Project is located in an area considered to be non-VHFHSZ.<sup>43</sup> The City is responsible for fire protection in the area, which is implemented in part by enforcement of Fire Code requirements contained within the Building Code, as well as fire protection services provided by the City Fire Department.

As described in **Section 4.7: Greenhouse Gas Emissions**, the proposed Project is located on level terrain. Based on the topographic setting and a review of previous geotechnical evaluations in the proposed Project's vicinity, no historical landslides are known to have occurred that could potentially impact the

41 California Department of Forestry and Fire Protection, 2011. Fire and Resource Assessment Program. Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Los Angeles County.  
42 City of Inglewood, General Plan (adopted July 1995).  
43 California Department of Forestry and Fire Protection, 2011. Fire and Resource Assessment Program. Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Los Angeles County.

6.0 Other Environmental Considerations

proposed Project. The nearest surrounding mountains, the Santa Monica Mountains, are more than 10 miles to the north.<sup>44</sup>

According to the CGS,<sup>45</sup> the proposed Project is not located within an Earthquake-Induced Landslide Zone as shown on the Earthquake Zones of Required Investigation, Inglewood Quadrangle map. The probability of seismically induced landslides occurring within the area of the proposed Project is not significant due to the general lack of elevation difference in slope geometry across or adjacent to the site. In addition, development of the proposed Project would not substantially alter the existing topography of the area.

Therefore, the proposed Project's impacts on exacerbation of wildfire risks, and thereby exposure of Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would be less than significant due to slope, prevailing winds, and other factors.

**Threshold:** Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Significant impacts would occur if the proposed Project were to require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

As discussed above in **Section 4.14: Utilities and Service Systems**, the proposed Project will require utility systems improvements, upgrades, and possible relocations to accommodate and serve the various project related components. The design and construction of the proposed Project's elevated guideway structures, stations and support facilities will avoid existing utility and other infrastructure to the degree possible. In addition to surface improvements, some utility infrastructure that cannot be avoided may need to be relocated to accommodate the guideway columns and foundations. As mentioned above, the City is a fully developed urban area that is not associated with wildland fires. According to the Fire Hazard Severity Zone mapping done by the California Department of Forestry and Fire Protection, the proposed Project is located in an incorporated city that is considered to be non-VHFHSZ.<sup>46</sup> The City is responsible for fire protection in the area, which is implemented in part by enforcement of Fire Code requirements contained within the Building Code, as well as fire protection services provided by the City Fire Department. With

44 Google Maps, <https://www.google.com/maps>. Accessed October 2021.  
45 CDC, CGS, Earthquake Zones of Required Investigation.  
46 California Department of Forestry and Fire Protection, 2011. Fire and Resource Assessment Program. Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Los Angeles County.

adherence to Fire Code requirements contained within the Building Code and implementation of fire protection services provided by the City Fire Department, any potential infrastructure-induced fire risk or ongoing environmental impacts would be less than significant.

**Threshold: Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

Significant impacts would occur if the proposed Project were to expose people or structures to impacts associated with downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. The City is a fully developed urban area that is not associated with wildland fires. According to the Fire Hazard Severity Zone mapping done by the California Department of Forestry and Fire Protection, the proposed Project is located in an incorporated city that is considered to be non-VHFHSZ.<sup>47</sup> The City is responsible for fire protection in the area, which is implemented in part by enforcement of Fire Code requirements contained within the Building Code, as well as fire protection services provided by the City Fire Department.

As discussed in **Section 4.7**, the proposed Project is located on level terrain. Based on the topographic setting and a review of previous geotechnical evaluations in the proposed Project's vicinity, no historical landslides are known to have occurred that could potentially impact the proposed Project.

According to the CGS,<sup>48</sup> the proposed Project is not located within an Earthquake-Induced Landslide Zone as shown on the Earthquake Zones of Required Investigation, Inglewood Quadrangle map. The probability of seismically induced landslides occurring within the area of the proposed Project is not significant due to the general lack of elevation difference in slope geometry across or adjacent to the site. In addition, development of the Project would not substantially alter the existing topography of the area.

No streams or rivers run within the proposed Project's location, nor does it propose any changes to existing drainage patterns. During construction, BMPs (required and monitored under the SWPPP) would be used to reduce the volume and velocity of stormwater runoff, thereby mitigating the potential for flooding due to construction. Any accumulated sediment observed during inspection of temporary BMPs or permanent stormwater network devices would be removed to prevent flooding. The proposed Project is located outside the 100-year Federal Emergency Management Agency (FEMA) flood hazard area.<sup>49</sup> No

<sup>47</sup> California Department of Forestry and Fire Protection, 2011. Fire and Resource Assessment Program. Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Los Angeles County.

<sup>48</sup> California Department of Forestry and Fire Protection, 2011. Fire and Resource Assessment Program. Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Los Angeles County.

<sup>49</sup> County of Los Angeles, Department of Public Works, Flood Zone Determination Website, <http://dpw.lacounty.gov/floodzone/>.

topographic changes or altered drainage patterns are currently proposed as part of the proposed Project, and any increases in runoff would be handled through compliance with MS4 Permit requirements during operation.

As such, no impacts associated with downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes would occur.

## 6.5 GROWTH INDUCING EFFECTS

As required CEQA Guidelines section 15126.2(e),<sup>50</sup> an EIR must discuss ways in which a project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Also, an EIR must discuss the characteristics of a project that could encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Growth can be induced in a number of ways, such as through the elimination of obstacles to growth, through the stimulation of economic activity within the region, or through the establishment of policies or other precedents that directly or indirectly encourage additional growth. The purpose of this section is to evaluate the potential growth-inducing effects resulting from the implementation of the proposed Project in the greater Los Angeles area. Additional analysis of the effects of the proposed Project on population and employment growth is provided in **Section 4.11: Population, Employment, and Housing**.

In general, a project may foster spatial, economic, or population growth in a geographic area if the project removes an impediment to growth (e.g., the establishment of an essential public service, the provision of the new access to or infrastructure capacity that serves an area; a change in zoning or general plan designations that increase density for areas outside the boundaries of a project site); or indirectly stimulates economic expansion or growth that occurs in an area in response to the project (e.g., changes in revenue base, employment expansion, etc.). These circumstances are further described below:

- **Elimination of Obstacles to Growth:** This refers to the potential for a project to remove infrastructure limitations or provide infrastructure capacity, or remove regulatory constraints that could result in growth unforeseen at the time of project approval; and
- **Economic Effects:** This refers to the potential for a project to cause increased activity in the local or regional economy. Economic effects can include such effects as the Multiplier Effect. A "multiplier" is an economic term used to describe inter-relationships among various sectors of the economy. The Multiplier Effect provides a quantitative description of the direct employment effect of a project, as well as indirect and induced employment growth. The multiplier effect recognizes that the on-site employment and population growth of each project may not be the complete picture of growth caused by the project.

<sup>50</sup> CEQA Guidelines sections 15126.2(e).

### Elimination of Obstacles to Growth

The elimination of physical obstacles to growth is considered a growth-inducing effect. The proposed Project is located in a highly urbanized area in the vicinity of other facilities designed to accommodate large sporting and entertainment events. Common factors that limit growth include limited capacities of local or regional utility infrastructure, such as storm drainage systems, or wastewater conveyance and treatment systems. Transportation infrastructure can also be a factor that limits growth.

The proposed Project is located within a fully urbanized landscape, with extensive transportation and utility infrastructure designed to accommodate urban development in the City and the larger South Bay region.

### Economic Effects

**Section 4.11, Population, Employment, and Housing** describes potential employment of the proposed Project. The proposed Project is anticipated to have a total direct employment of up to 150 full-time equivalent people. This would include workforce requirements for the operation and maintenance necessary for the proposed Project, including system engineers, operators, maintenance personnel, janitorial crews, security, and other jobs. These jobs would extend beyond construction and into oversight of long-term operations.

Additionally, the proposed Project will provide funding for the support and transition of jobs through the California Climate Investments which facilitate GHG emission reductions and deliver a suite of economic, environmental, and public health co-benefits, including job co-benefits. Approximately 11,516 jobs will be benefitted through these funds and programs. Estimated jobs supported by the California Climate Investments through the proposed Project can be found in the **Table 4.11-8**.

The proposed Project would also result in some existing uses located on properties proposed for acquisition in order to accommodate the various Project components (guideway, stations, and MSF). Existing uses located on these properties include the commercial/retail center at the southeast corner of Florence Avenue and Market Street that would be removed for the Market Street/Florence Avenue station, the office uses at the southwest corner of Prairie Avenue and Manchester Boulevard, the commercial/retail space at the northwest corner of Prairie Avenue and Hardy Street, the commercial uses at 500 and 510 Manchester Boulevard that would be removed for the proposed MSF, and the commercial building that would be removed to allow for the encroachment of the guideway at 150 S. Market Street. The existing work force for these uses include:

- The retail commercial center at Market Street and Florence Avenue with an estimated 284 workers employed at the various commercial and retail uses.
- The private property at the southwest corner of Prairie Avenue and Manchester Boulevard with an estimated 98 workers employed under office uses.

- The private property at the northwest corner of Prairie Avenue and Hardy Street with an estimated 123 workers employed at the various commercial/retail/office uses.
- The commercial use at 150 S. Market Street with an estimated 37 workers; and
- Existing businesses at the commercial center at 500 and 510 Manchester Boulevard (grocery store, café, gym, bank, and a gas station) which have a combined estimated workforce of 172 workers.<sup>51</sup>

In total, the existing businesses on these properties which would be displaced by the construction of the proposed Project employs approximately 733 workers (for existing employment details refer to **Table 4.11-6**). To the extent these businesses relocate in Inglewood, these existing jobs would be retained.

The proposed Project would generate approximately 150 full-time jobs for the operation and maintenance of the ATS trains and will either directly or indirectly benefit 11,516 jobs. This results in a net support for approximately 10,783<sup>52</sup> jobs with the implementation of the proposed Project. Furthermore, ongoing, and proposed developments along the elevated guideway would also benefit from the implementation of the proposed Project. Nearby projects such as the Hollywood Park Specific Plan (HPSP) and the Los Angeles Sports and Entertainment District (LASED) would also provide additional jobs and employment opportunities. The HPSP is projected to generate approximately 517 net new jobs<sup>53</sup> while the IBEC is projected to generate 833 net new jobs,<sup>54</sup> resulting in a combined 1,350 net new jobs from adjacent projects. Since jobs supported by the implementation of the proposed Project does not directly correlate to the number of new jobs created, the number of jobs created does not directly correlate to population growth within the area.

As previously discussed, approximately 92 percent of the residents in the City currently commutes to work outside of the City, with the remaining 8 percent of residents working within the City (**Table 4.11-5**). This pattern points to a regional spread in work locations for the City residents. Because of this, local fluctuations in job generation are unlikely to directly impact population growth within the City. Even though the proposed Project will either directly or indirectly support 10,783 jobs, the implementation of the proposed Project will only directly create 150 full-time equivalent jobs. Therefore, not all jobs

51 Number of employees generated by each commercial plaza area are calculated using the square footage of the facilities multiplied by a set factor. The factor used is 2.2371 employees per 1,000 SF, which is found in Inglewood Unified School District's Commercial Fee Justification Study 2018. The report can be located at: [https://www.lbschools.net/Asset/Files/Business\\_Services/Developer\\_Fees/2018/2018-Commercial-Fee-Justification-Study.pdf](https://www.lbschools.net/Asset/Files/Business_Services/Developer_Fees/2018/2018-Commercial-Fee-Justification-Study.pdf). Accessed September 7, 2021. It is important to note that land areas and number of employees are rounded numbers used for estimates for analysis purposes only.

52 11,516 minus 733 in numbers of jobs displaced.

53 Hollywood Park Specific Plan. "Introduction Executive Summary." <https://www.cityofinglewood.org/DocumentCenter/View/125/1-Introduction-Executive-Summary-PDF>. Accessed October 2021.

54 City of Inglewood. Summary. <https://www.cityofinglewood.org/DocumentCenter/View/13888/03-Summary>. Accessed October 2021.

supported by the proposed Project will translate into an increase in population growth for the local area or the region.

Additionally, according to SCAG 2020-2045 RTP/SCS, approximately 8,389,000 jobs were available in 2016 across industries in the region and the number of jobs available would increase to 10,050,000 by 2045, an increase of approximately 0.62 percent or approximately 52,700 annually in jobs.<sup>55</sup> The proposed Project would provide benefits to approximately 0.13 percent of the jobs in the region based on the 2016 jobs number or approximately 20 percent of new jobs added to the region annually. The jobs that would be supported by the proposed Project in the region is within the regional trends provided by the SCAG 2020-2045 RTP/SCS data and the jobs that would benefit from the proposed Project does not directly translate into population growth.

As a result of this analysis, the proposed Project will not substantially induce population growth beyond the regionally projected value. Therefore, there is a less than significant impact on employment and population growth from the operation of the proposed Project.

### Environmental Effects of Induced Growth

The proposed Project's is a transit system that spans the length of approximately 1.6 miles and would be located near existing residential, office, retail, and commercial land uses which generate vehicle trips on local roadways within the City. The proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Metro K line, and other transit providers as well as the City's major activity centers, such as The Forum, the LASED and HPSP. Implementation of the proposed Project would provide an alternate mode of transportation within the City and decrease vehicle ridership and thereby resulting in a corresponding decrease in VMTs.

The proposed Project would be designed to accommodate a projected demand of approximately 11,450 travelers during the peak hour in each direction for special-events service, which occurs during a three event night.<sup>56</sup> In addition, the operations to serve the normal weekday peak-hour ridership outlined in the Lea+Elliott Report would be approximately 414 pedestrians per hour per direction (pphpd). At 2.0 minutes headway, the system capacity is approximately 11,000 pphpd. **Table 4.12-8** shows the projected ridership numbers for the proposed Project.

VMT estimates are derived from the Transportation Study (see **Appendix O**) and are shown in **Table 4.7-7** for the six operational scenarios with and without the proposed Project. As shown, the proposed Project daily and annual VMT are less than the daily and annual VMT without the proposed Project.

<sup>56</sup> Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition, August 2021.

<sup>56</sup> Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition, August 2021.

Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce VMT accordingly.

The proposed Project will help manage and support the City's projected growth by providing transit within a safe and accessible walking distance to thousands of new residents, housing units and jobs. The proposed Project's connection from the City's new housing and employment centers, and sports and entertainment venues, to the Metro K Line and larger regional and State rail system will result in significant benefits for both the City and southern California region. The housing and employment growth projected in the City, together with the proposed Project, are generating approximately 6.9 million annual boardings on the regional transportation system in 2026 and increase to approximately 13.9 million annual boardings in 2076;<sup>57</sup> the resulting reduction in VMT in 2026 is approximately 30 million, and in 2076 will reach 67.4 million. These reductions will improve air quality through reduced emissions and generate a significant reduction in the generation of GHG emissions throughout the region.

The incremental changes in economic activity created by the indirect and induced employment associated with the proposed Project would be a small part of the overall future growth in economic activity in the City or the greater Los Angeles metropolitan region. The City is approving additional employment-generating land uses such as the LASED and HPSP, which would benefit from the proposed Project. Through their planning and entitlement actions, the future actions of the City and other surrounding local agencies would be subject to environmental review under CEQA and would be required to be consistent with regional and State plans and regulations. To the extent that future development that accommodates indirect and induced growth from the proposed Project is undertaken in a manner consistent with the multitude of planning and regulatory documents referred to throughout the technical sections of this EIR, many of the potential adverse environmental consequences would be reduced in magnitude or avoided altogether.

Although the economic effect of indirect and induced employment can be predicted because the adverse physical environmental impacts of these economic effects could occur at locations throughout the City and the Los Angeles metropolitan region, the environmental consequences of this type of economic growth are too speculative to evaluate or predict. Pursuant to CEQA Guidelines section 15145, no further analysis of the environmental consequences of indirect or induced growth associated with the proposed Project is required under CEQA.

<sup>57</sup> City of Inglewood, Transit, and Intercity Rail Program (TIRCP) Application for the City of Inglewood Transit Connector Project, January 16, 2020. Table 6.

## 7.0 ORGANIZATIONS AND PERSONS CONSULTED

The City of Inglewood, with assistance from Meridian Consultants LLC, prepared this Recirculated Draft Environmental Impact Report (Recirculated Draft EIR). The report preparers and consultants are identified as follows, along with agencies, organizations, and individuals that provided information used to prepare this Recirculated Draft EIR.

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**8.0 TERMS, DEFINITIONS, AND ACRONYMS**

AAQS	ambient air quality standards
AB	Assembly Bill
ACC	Advanced Clean Cars
ACM	asbestos-containing materials
ACWM	asbestos-containing waste materials
ADA	Americans with Disabilities Act
ADT	Average daily traffic
AERMOD	American Meteorological Society/USEPA Regulatory Model
AFY	Acre-feet per year
AIA	Airport Influence Area
ALRT	Automated light rail transit
ALUC	Airport land use commission
ALUP	Los Angeles County Airport Land Use Plan
AM	Morning Peak Hour
ANSI	American National Standard Institute
ATS	Automated Transit System
APEFZ	Alquist-Priolo earthquake fault zones
AQMP	SCAQMD 2016 Air Quality Management Plan
ATCM	Airborne Toxic Control Measure
BACT	Best Available Control Technology
Basin	South Coast Air Basin
BAU	Business-as-usual
BMP	best management practice
BRT	Bus rapid transit
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
California Register/CR	California Register of Historical Resources
CalRecycle	California Department of Resources Recycling and Recovery
CALSTA	California State Transportation Agency

**8.0 Terms, Definitions, and Acronyms**

Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CBSC	California Building Code Commission
CCC	Command, control, and communications
CCP	Construction Commitment Program
CCR	California Code of Regulations
CCTV	Closed-circuit television
CDC	California Department of Conservation
CDFW	California Department of Fish and Wildlife
CDRP	Construction and Demolition Recycling Program
CDS	Consolidated Disposal Service
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CEUS	California Commercial End Use Survey
CFR	Code of Federal Regulations
CGP	Construction General Permit
CGS	California Geological Survey
CHHSL	California Human Health Screening Levels
CHMIRS	California Hazardous Material Incident Report System
CHRIS	California Historic Resources Information System
CI	Compression ignition
CIP	cast-in-place
City	City of Inglewood
CIWMB	California Integrated Waste Management Board
CLEO	Commercial Lighting Efficiency Offer
CMP	Congestion Management Plan
CNDDB	California Natural Diversity Database
CNEL	Community noise exposure level
CO	Carbon monoxide
CO2	Carbon dioxide
Col WMP	County of Los Angeles Integrated Waste Management Plan

**8.0 Terms, Definitions, and Acronyms**

COPCs	Chemicals of potential concern
COPD	Chronic obstructive pulmonary disease
CPUC	California Public Utility Commission
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CNRA	California Natural Resources Agency
County	County of Los Angeles
CPUC	California Public Utilities Commission
CTA	Central Terminal Area
CVT	Consolidated Volume Transport Disposal and Recycling Center
CWC	California Water Code
CY	Cubic yards
DB	decibel
dBA	A-weighted sound pressure level
DBFOM	design/build/finance/operate/maintain
DBH	Diameter at breast height
DDW	Division of Drinking Water
DES	Division of Engineering Services
DHS	Department of Health Services
DMV	Department of Motor Vehicles
DNEL	Day-Night Average Sound Level
DOE	Department of Energy
DOGGR	Department of Conservation, Division of Oil, Gas and Geothermal Resources
DOSH	Division of Occupational Safety and Health
DPM	Diesel Particulate Matter
DPF	Diesel Particulate Filters
DTSC	California Department of Toxic Substances Control
DWP	Drinking Water Program
ECAP	Energy and Climate Action Plan
EIFD	Enhanced Infrastructure Financing District
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act
ELM	Energy Loading Monitoring
EPCRA	Emergency Planning and Community Right-to Know Act

*8.0 Terms, Definitions, and Acronyms*

ETDM	Event Travel Demand Model
EWMP	Enhanced Watershed Management Programs
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FTA	Federal Transit Administration
Geosyntec	Geosyntec Consultants
GHG	Greenhouse Gas
GPS	Geographic positioning system
GSA	Groundwater Sustainability Agencies
GSP	Groundwater Sustainability Plans
GSWC	Golden State Water Company
GWP	Global warming potential
HABS	Historic American Buildings Survey
HAZNET	California Department of Toxic Substances Control database
HCP	Habitat Conservation Plan
HEPA	High-efficiency particulate air filters
HHM	Hazards and Hazardous materials
HHMD	Hazards and Hazardous Materials Division
HHR	Jack Northrop Field/Hawthorne Municipal Airport (HHR)
HI	Hazard Index
HMBP	Hazardous materials business plan
HOT	High occupancy toll
HPSP	Hollywood Park Specific Plan
HRA	Health Risk Assessment
HRG	Historic Resources Group
HSWA	Hazardous and Solid Waste Amendments
Hz	Hertz
IBEC	Inglewood Basketball and Entertainment Center
ICT	Innovative Clean Transit Program
IEC	International Electrotechnical Commission
IHPA	Inglewood Historic Preservation Alliance
IIPP	Injury and Illness Prevention Program
IMC	City of Inglewood Municipal Code

*8.0 Terms, Definitions, and Acronyms*

IPCC	Intergovernmental Panel on Climate Change
IPD	Inglewood Police Department
ips	Inches per second
IRP	Integrated Water Resources Plan
ITC	Inglewood Transit Connector
ITDF	Inglewood Travel Demand Forecasting Model
ITF	Inglewood intermodal transit facility
JWPCP	Joint Water Pollution Control Plant
LACDRP	Los Angeles County Department of Regional Planning
LACFD	Los Angeles County Fire Department
LACM	Natural History Museum of Los Angeles County
LACSD	Los Angeles County Sanitation District
LADOT	Los Angeles Department of Transportation
LADWP	City of Los Angeles Department of Water and Power
LAMP	Landside Access Modernization Program
LARWQCB	Los Angeles Regional Water Quality Control Board
LASED	Los Angeles Sports and Entertainment District
LAWA	Los Angeles World Airports
LAX	Los Angeles International Airport
LAX ALUP	LAX Airport Land Use Plan
LCFS	Low Carbon Fuel Standard
LDP	Lead-based paints
LED	Light-emitting diode
LEPC	Local emergency planning center
LPA	Locally Preferred Alternative
LID	low-impact development
Lmax	Maximum noise level
LRT	Light Rail Transit
Lv	velocity level in decibels as measured in 1/3 octave bands of frequency over the frequency ranges of 8 to 80
MATES IV	Multiple Air Toxics Exposure Study
MBTA	Migratory Bird Treaty Act
MD	Midday

8.0 Terms, Definitions, and Acronyms

MDAB	Mojave Desert Air Basins
MDE	Maximum design element
MDR LCP	Marina Del Rey Local Coastal Program
Metro	Los Angeles County Metropolitan Transportation Authority
MEI	Maximally exposed individual
MHMP	Multi-Hazard Mitigation Plan
MM	Mitigation measure
MMRP	Mitigation monitoring and reporting program
MPO	Metropolitan planning organization
MRZ-3	Mineral Resources Zone 3
MS4	Municipal Separate Storm Sewer System
MSF	Maintenance and storage facility
MTA	Metropolitan Transportation Authority
MTD	Memo to designers
MTBE	methyl tertiary-butyl ether
NAAQS	National Ambient Air Quality Standards
NAHC	California Native American Heritage Commission
National Register/NR	National Register of Historic Places
NBA	National Basketball Association
NCCP	Natural Community Conservation Plan
NEHRPA	National Earthquake Hazards Reduction Program
NFL	National Football League
NFRAP	No Further Remedial Action Planned
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NIFZ	Newport-Inglewood Fault Zone
NIST	National Institute of Standards and Technology
NPPA	California Naive Plant protect act
NPS	National Park Service
NO	Nitric oxide
NOx	Nitrogen Oxide
NPDES	National Pollutant Discharge Elimination System
NSF	National Science Foundation

8.0 Terms, Definitions, and Acronyms

NSR	New Source Review
OEHHA	Office of Environmental Health Hazard Assessment
OES	Office of Emergency Services
OHP	Office of Historic Preservation
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Act
PCB	polychlorinated biphenyl
PCE	Perchloroethylene
PDS	Power Distribution System
PEM	Premium Efficiency Motors
PFA	Public Financing Authority
PHBT	Puente Hills Blind Thrust fault
PM	Evening Peak Hour
PM	Particulate Matter
PPV	Peak particle velocity
PRC	Public Resources Code
PSC	Property-specific Soil Criteria
PVC	Polyvinyl chloride
RCRA	Resource Conservation and Recovery Act
RFS	Renewable Fuel Standard
RHNA	Regional Housing Needs Allocation
RMS	Root mean square
ROGs	Reactive organic gases
ROW	Right-of-way
RPS	Renewable Portfolio Standards
RPZ	Reduced pressure zone
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SAFE Vehicles Rule	Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks
SAR	Second Assessment Report
SB	Senate Bill
SBCCOG	South Bay Cities Council of Governments
SCAB	South Coast Air Basin

8.0 Terms, Definitions, and Acronyms

SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SCP	Site Cleanup Program
SCS	Sustainable Communities Strategy
SEL	Sound exposure level
SERC	State Emergency Response Center
SGMA	Sustainable Groundwater Management Act
SHRC	State Historical Resources Commission
SLF	Sacred Lands File
SLMs	Sound level meters
SMFZ	Santa Monica Fault Zone
SMP	Soils Management Plan
SOx	Sulfur oxide
SP	Service population
SRTS	Safe Routes to Schools
SSMP	Sewer System Management Plan
SUSMP	Standard Urban Storm Water Mitigation Plan
SVP	Society of Vertebrate Paleontology
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic air contaminants
TBA	tert-Butyl alcohol
TCR	Tribal cultural resource
TIRCP	Transit and Intercity Rail Capital Program
TNC	Transportation network company
TNM	Traffic noise model
TOD	Transit Oriented Development
TOD Plan	City of Inglewood 2016 <i>New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines</i>
TPZ	Tree Protective Zone
TSA	Thomas Safran & Associates
TSCA	Toxic Substances Control Act

8.0 Terms, Definitions, and Acronyms

UPS	Uninterruptible power supplies
USDOE	US Department of Energy
USDOT	US Department of Transportation
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	US Geological Survey
UWMP	City of Inglewood <i>2015 Urban Water Management Plan Update</i>
UST	Underground storage tank
VdB	Vibration decibels
VDC	Volt direct current
VMT	Vehicle miles traveled
VOC	Volatile organic compound
WBMWD	West Basin Municipal Water District
WMPs	Watershed Management Programs
YOLA	Youth Orchestra Los Angeles
ZE	Zero emissions

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# Notice of Completion

**Notice of Completion & Environmental Document Transmittal**

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613  
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<b>SCH # 2018071034</b>
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**Project Title:** Inglewood Transit Connector ProjectLead Agency: City of InglewoodContact Person: Mindy Wilcox, Planning ManagerMailing Address: One W. Manchester Boulevard, 4th FloorPhone: (310) 412-5230City: InglewoodZip: 90301County: Los Angeles**Project Location:** County: Los AngelesCity/Nearest Community: InglewoodCross Streets: Florence Ave and Market St, Manchester Blvd and Prairie Ave, Prairie Ave and Hardy St Zip Code: 90301

Longitude/Latitude (degrees, minutes and seconds): \_\_\_\_\_ ° \_\_\_\_\_ ' \_\_\_\_\_ " N / \_\_\_\_\_ ° \_\_\_\_\_ ' \_\_\_\_\_ " W Total Acres: \_\_\_\_\_

Assessor's Parcel No.: \_\_\_\_\_ Section: \_\_\_\_\_ Twp.: \_\_\_\_\_ Range: \_\_\_\_\_ Base: \_\_\_\_\_

Within 2 Miles: State Hwy #: \_\_\_\_\_ Waterways: \_\_\_\_\_

Airports: \_\_\_\_\_ Railways: \_\_\_\_\_ Schools: Kelso Elementary Sch**Document Type:**

CEQA:  NOP  Draft EIR NEPA:  NOI Other:  Joint Document  
 Early Cons  Supplement/Subsequent EIR  EA  Final Document  
 Neg Dec (Prior SCH No.) \_\_\_\_\_  Draft EIS  Other: \_\_\_\_\_  
 Mit Neg Dec Other: NOA  FONSI \_\_\_\_\_

**Local Action Type:**

General Plan Update  Specific Plan  Rezone  Annexation  
 General Plan Amendment  Master Plan  Prezone  Redevelopment  
 General Plan Element  Planned Unit Development  Use Permit  Coastal Permit  
 Community Plan  Site Plan  Land Division (Subdivision, etc.)  Other: Overlay Zone

**Development Type:**

Residential: Units \_\_\_\_\_ Acres \_\_\_\_\_  Transportation: Type Automated People Mover (APM)  
 Office: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  Mining: Mineral \_\_\_\_\_  
 Commercial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  Power: Type \_\_\_\_\_ MW \_\_\_\_\_  
 Industrial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  Waste Treatment: Type \_\_\_\_\_ MGD \_\_\_\_\_  
 Educational: \_\_\_\_\_  Hazardous Waste: Type \_\_\_\_\_  
 Recreational: \_\_\_\_\_  Other: \_\_\_\_\_  
 Water Facilities: Type \_\_\_\_\_ MGD \_\_\_\_\_

**Project Issues Discussed in Document:**

Aesthetic/Visual  Fiscal  Recreation/Parks  Vegetation  
 Agricultural Land  Flood Plain/Flooding  Schools/Universities  Water Quality  
 Air Quality  Forest Land/Fire Hazard  Septic Systems  Water Supply/Groundwater  
 Archeological/Historical  Geologic/Seismic  Sewer Capacity  Wetland/Riparian  
 Biological Resources  Minerals  Soil Erosion/Compaction/Grading  Growth Inducement  
 Coastal Zone  Noise  Solid Waste  Land Use  
 Drainage/Absorption  Population/Housing Balance  Toxic/Hazardous  Cumulative Effects  
 Economic/Jobs  Public Services/Facilities  Traffic/Circulation  Other: Energy, GHG, Utilities

**Present Land Use/Zoning/General Plan Designation:**

Downtown TOD, Public Rights-Of-Way, Commercial, and Commercial Recreation

**Project Description:** (please use a separate page if necessary)

The Inglewood Transit Connector Project (ITC Project) is a 1.6-mile, three-station, fully elevated, electrically powered light-rail transit system, including, among other things, an Automated People Mover (APM) mass-transit line, proposed by the City to close the last-mile gap and connect passengers between the Metro Crenshaw/LAX Line and Downtown Inglewood to major event and activity centers, including the Forum, the Los Angeles Sports and Entertainment District (which includes SoFi Stadium) and the Inglewood Basketball and Entertainment Center. The ITC Project also includes a maintenance storage facility (MSF) for maintaining APM trains, two traction power substations (TPSSs) for providing power to the APM system, and surface parking facilities at the Market Street/Florence Avenue station, the MSF, and at 150 Market Street.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

## Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".  
If you have already sent your document to the agency please denote that with an "S".

<u>S</u> Air Resources Board	<u>X</u> Office of Historic Preservation
<u>    </u> Boating & Waterways, Department of	<u>    </u> Office of Public School Construction
<u>    </u> California Emergency Management Agency	<u>    </u> Parks & Recreation, Department of
<u>    </u> California Highway Patrol	<u>    </u> Pesticide Regulation, Department of
<u>S</u> Caltrans District # <u>7</u>	<u>S</u> Public Utilities Commission
<u>S</u> Caltrans Division of Aeronautics	<u>S</u> Regional WQCB # <u>LA</u>
<u>S</u> Caltrans Planning	<u>    </u> Resources Agency
<u>    </u> Central Valley Flood Protection Board	<u>    </u> Resources Recycling and Recovery, Department of
<u>    </u> Coachella Valley Mtns. Conservancy	<u>    </u> S.F. Bay Conservation & Development Comm.
<u>    </u> Coastal Commission	<u>    </u> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
<u>    </u> Colorado River Board	<u>    </u> San Joaquin River Conservancy
<u>    </u> Conservation, Department of	<u>    </u> Santa Monica Mtns. Conservancy
<u>    </u> Corrections, Department of	<u>    </u> State Lands Commission
<u>    </u> Delta Protection Commission	<u>    </u> SWRCB: Clean Water Grants
<u>    </u> Education, Department of	<u>    </u> SWRCB: Water Quality
<u>    </u> Energy Commission	<u>    </u> SWRCB: Water Rights
<u>S</u> Fish & Game Region # <u>SAC</u>	<u>    </u> Tahoe Regional Planning Agency
<u>    </u> Food & Agriculture, Department of	<u>    </u> Toxic Substances Control, Department of
<u>    </u> Forestry and Fire Protection, Department of	<u>    </u> Water Resources, Department of
<u>    </u> General Services, Department of	<u>    </u> Other: _____
<u>    </u> Health Services, Department of	<u>    </u> Other: _____
<u>    </u> Housing & Community Development	
<u>S</u> Native American Heritage Commission	

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### Local Public Review Period (to be filled in by lead agency)

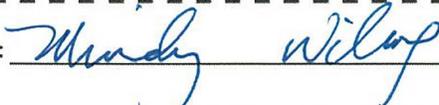
Starting Date November 12, 2021 Ending Date December 27, 2021

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### Lead Agency (Complete if applicable):

Consulting Firm: <u>Meridian Consultants LLC</u>	Applicant: <u>City of Inglewood</u>
Address: <u>920 Hampshire Road, Suite A-5</u>	Address: <u>One W. Manchester Boulevard, 4th Floor</u>
City/State/Zip: <u>Westlake Village, CA 91361</u>	City/State/Zip: <u>Inglewood, CA 90301</u>
Contact: <u>Tony Locacciato</u>	Phone: <u>(310) 412-5230</u>
Phone: <u>(805) 444-7896</u>	

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Signature of Lead Agency Representative:  Date: 11/10/2021

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

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# Notice of Availability



# CITY OF INGLEWOOD

## ECONOMIC AND COMMUNITY DEVELOPMENT DEPARTMENT

### Planning Division



Christopher E. Jackson, Sr.  
Director

Mindy Wilcox, AICP  
Planning Manager

**November 11, 2021**

### **NOTICE OF AVAILABILITY OF A RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT**

NOTICE IS HEREBY GIVEN that the City of Inglewood (City or Inglewood) has prepared a Recirculated Draft Environmental Impact Report (Recirculated Draft EIR) for the Inglewood Transit Connector Project (ITC Project). The Recirculated Draft EIR is being distributed for public review. Pursuant to the California Public Resources Code and the California Environmental Quality Act (CEQA) Guidelines, the City of Inglewood is the Lead Agency for the ITC Project.

**PROJECT TITLE: Inglewood Transit Connector Project**

**STATE CLEARINGHOUSE NO.: 2018071034**

**PROJECT DESCRIPTION:** The Inglewood Transit Connector Project (ITC Project) is a 1.6-mile, three-station, fully elevated, electrically powered light-rail transit system, including, among other things, an Automated Transit System (ATS) mass-transit line, proposed by the City to close the last-mile gap and connect passengers between the Metro K (Crenshaw/LAX) Line and Downtown Inglewood to major event and activity centers, including the Forum, the Los Angeles Sports and Entertainment District, including SoFi Stadium, and the Inglewood Basketball and Entertainment Center (Intuit Dome). Three stations are proposed: (1) The Market Street/Florence Avenue station generally located between Market Street and Locust Street; (2) The Prairie Avenue/Manchester Boulevard station located on the southwest corner of Prairie Avenue and Manchester Boulevard; and (3) The Prairie Avenue/Hardy Street station located on the northwest corner of Prairie Avenue and Hardy Street. The ITC Project also includes a maintenance storage facility (MSF) for maintaining ATS trains, two power distribution substations (PDSs) for providing power to the ATS system, and public parking along the proposed alignment at the Market Street/Florence Avenue station, 150 South Market Street and the Prairie Avenue/Hardy Street station. The proposed Project is planned to operate from 6:00 AM to 12:00 AM during the week and on weekends, with the possibility of extending operation hours as needed during special events.

**PROJECT LOCATION:** The proposed Project is located entirely in the central portion of the City, east of the San Diego Freeway (I-405) and north of the Glen Anderson Freeway (I-105) in Los Angeles County, California. The proposed alignment for the Project would be primarily located within the public right of way along Market Street, Manchester Boulevard, and Prairie Avenue, with limited encroachments on adjacent private property (See **Figure 1: Project Vicinity Map**).

**Environmental Topics Evaluated/Potentially Significant Impacts:** The Recirculated Draft EIR examines the potential impacts that would be generated by the ITC Project for the following environmental topics: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use and Planning, Noise and Vibration, Population, Employment, and Housing, Transportation, Tribal Cultural Resources, and Utilities and Service Systems. Less than significant impacts are identified for the following topics: Aesthetics, Energy, Greenhouse Gas Emissions, Hazards and Hazardous Waste, Noise and Vibration, Land Use and Planning, Population, Employment, and Housing, and Transportation. Potentially

November 11, 2021

significant impacts are identified related to the following topics: Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Tribal Cultural Resources, and Utilities and Service Systems. Measures are identified to mitigate all potentially significant impacts to less than significant.

**Alternatives Evaluated:** (1) No Project, (2) Bus Rapid Transit (BRT) System, (3) Market Street Pedestrian Promenade, (4) 4th Station Alternative, (5) Prairie Avenue Single Station Alternative and (6) Maintenance and Storage Facility Relocation Alternative.

A portion of the Project Site, the MSF site located at 500 Manchester Boulevard, is included on the following list compiled pursuant to Section 65962.5 of the California Government Code: Historical Cortese list. The sites in this list are designated by the State Water Resource Control board [i.e., LUST sites], the Integrated WasteBoard [i.e., active, closed and inactive landfills, SWF/LF], and the Department of Toxic Substances Control [i.e., sites contain potential or confirmed hazardous substance release, CALSITES]. This list is no longer updated by the state.

### **Public Meeting**

A Public Meeting will be held at the date and time below to provide project information on the Project and Recirculated Draft EIR:

- **Date:** Monday, November 22, 2021
- **Time:** 6:00PM to 7:00PM

Please see below for instructions on how to join this meeting.

- **Zoom Meeting Weblink:**  
<https://trifiletticonsulting.zoom.us/j/86733559092?pwd=YWw3SFFSQUIZHRUeEU5Wml3U0tzQT09>
  - **Meeting ID:** 867 3355 9092      **Passcode:**1970
- **Join By Phone:**
  - **Number:** (253) 215-8782
  - **Number:** (346) 248-7799

**Public Comment Period:** The Recirculated Draft EIR and its technical appendices are available for public review and comment as required by Section 15105 of the CEQA Guidelines from November 12, 2021, through December 27, 2021. Written comments on the Recirculated Draft EIR and technical appendices must be received **no later than 5:00 p.m. on December 27, 2021.**

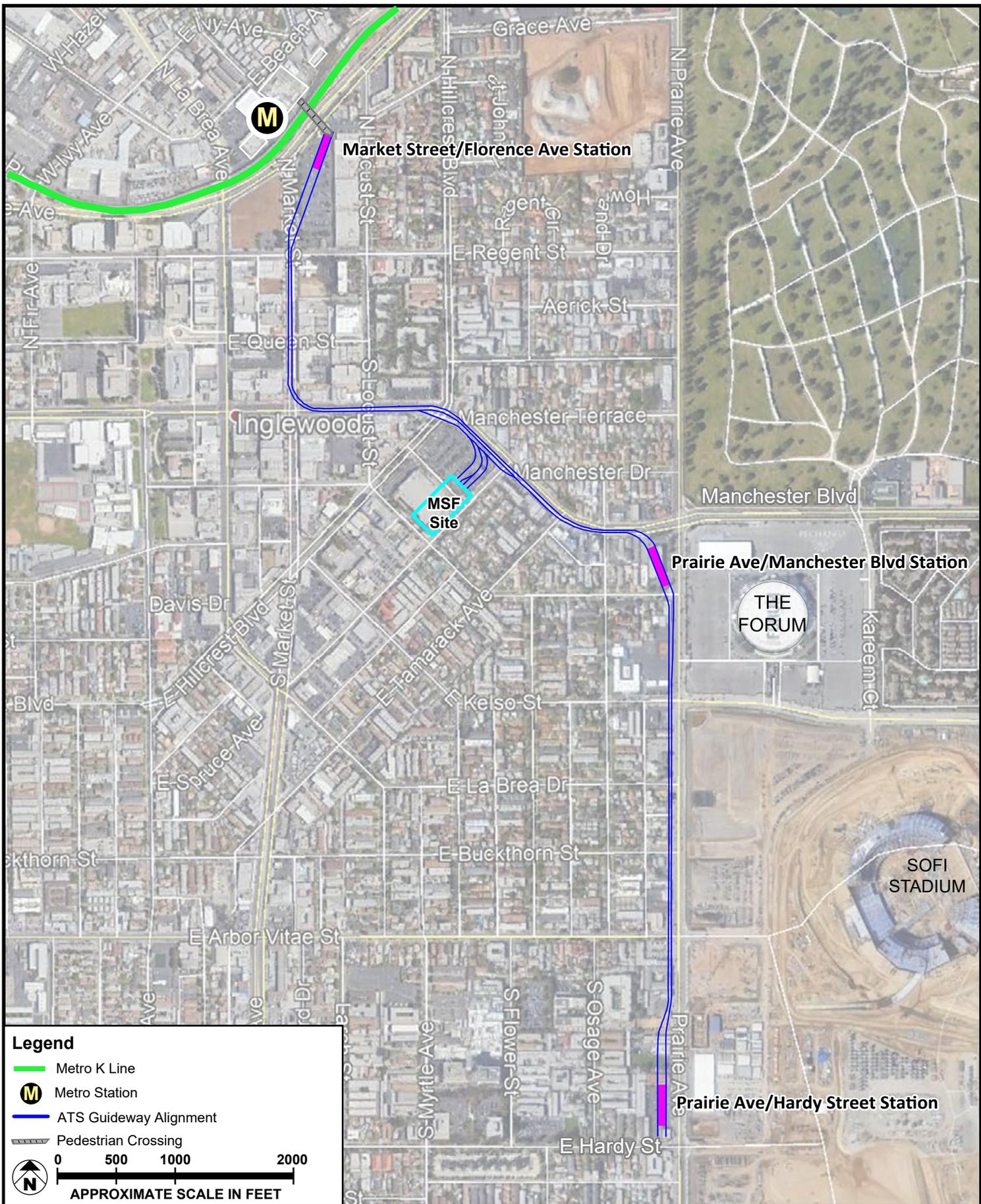
The Recirculated Draft EIR and technical appendices are available for review at the City of Inglewood website at:

<https://www.cityofinglewood.org/1016/Environmental-Documents>

Submit written comments to:

Mindy Wilcox, AICP, Planning Manager:  
City of Inglewood, Planning Division  
One W. Manchester Boulevard, 4th Floor  
Inglewood, CA 90301

You may also send comments via email to:  
E-Mail: [inglewoodtransitconnector@cityofinglewood.org](mailto:inglewoodtransitconnector@cityofinglewood.org)



SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021

Illustrative and subject to adjustments as part of finalization during final design

FIGURE 1



# Project Vicinity Map

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Final EIR

# Inglewood Transit Connector Project



## Final Environmental Impact Report

February 2022

State Clearinghouse No. 2018071034

Lead Agency: City of Inglewood, Economic and Community Development, Planning Division  
One West Manchester Boulevard, 4th Floor, Inglewood CA 90301



**Meridian**  
Consultants

# Final Environmental Impact Report for the Inglewood Transit Connector Project SCH NO. 2018071034

### PREPARED FOR:

City of Inglewood  
One W. Manchester Boulevard, 4th Floor  
Inglewood CA 90301

### PREPARED BY:

**Westlake Village**  
920 Hampshire Road, Suite A5  
Westlake Village, CA 91361

**Meridian**  
Consultants

**Los Angeles**  
706 S. Hill Street, 11th Floor  
Los Angeles, CA 90014

February 2022

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### Appendices

Appendix D: Construction Commitment Program

*A disc containing both the Final and Recirculated Draft EIR is attached on the inside back cover.*

## 1.0 INTRODUCTION AND LIST OF COMMENTERS

### 1.1 PURPOSE OF THIS DOCUMENT

This document includes all agency and public comments received on the Recirculated Draft Environmental Impact Report [Draft EIR, State Clearinghouse (SCH) #2018071034] for the Inglewood Transit Connector (ITC) Project (proposed Project). Written comments were received by the City of Inglewood during the public comment period from November 12, 2021 through December 27, 2021. This document includes written responses to each comment received on the Recirculated Draft EIR. The responses correct, clarify, and amplify text in the Recirculated Draft EIR, as appropriate. These changes do not alter the conclusions of the Recirculated Draft EIR. This Final EIR document has been prepared in accordance with the California Environmental Quality Act (CEQA) and together with the Recirculated Draft EIR (and Appendices) constitutes the EIR for the proposed Project that will be used by the decision makers during project hearings.

### 1.2 SUMMARY OF THE PROPOSED PROJECT

The proposed Project is an Automated Transit System (ATS) which would include an approximately 1.6-mile-long, elevated guideway located within current and to-be-acquired public right-of-way along Market Street, Manchester Boulevard, and Prairie Avenue. Three stations are proposed adjacent to the guideway on privately owned land that is proposed to be acquired as part of the proposed Project. The elevated guideway will contain dual lanes to allow trains to travel continuously in each direction. Several trains would likely be operating at the same time, depending on ridership demand.

As part of the City's collaboration and partnership with Metro, the proposed Project is proposed as an extension of the Metro regional rail system to the City's activity centers, closing the critical first/last mile transit gap in Inglewood, increasing passenger service along the Metro system by facilitating a seamless transfer of passengers between the ITC and the Metro K Line.

The ATS technology may be a self-propelled technology, including rubber-tire ATS systems, monorails, large steel-wheel ATS systems, also known as automated light rail transit (ALRT), or a cable propelled ATS system. The system will be fully automated (i.e., driverless) to operate at the headways to meet the projected peak ridership needs. The vehicles are smaller than traditional heavy rail technology and can maneuver the tight curves required for the site-specific conditions. This type of technology is oftentimes also referred to as automated guideway transit, automated people mover or monorail; regardless of the terminology used in the industry, it is a form of light rail technology without an overhead catenary.

1.0 Introduction and List of Commenters

The ATS trains will operate in a pinched-loop mode on dual tracks along the alignment, wherein trains follow each other and switch back at the end-of-line stations to make the return journey on the other track. As planned, the trains can be operated in multiple different configurations, ranging from a one-car train to multiple-car length trains with a maximum train length of approximately 200 feet. Depending on the technology (self-propelled or cable propelled) and ridership demands, which include time of day and are event day dependent, multiple trains of up to the maximum train length can be operated at varying headways for self-propelled systems, as close as 1.5 minutes apart, to provide the necessary peak and reserve capacity.

Three stations are proposed on private property proposed for acquisition as part of the proposed Project. These stations are:

- The *Market Street/Florence Avenue* station generally located between Market Street and Locust Street providing connections to the Metro K Line and Downtown Inglewood;
- The *Prairie Avenue/Manchester Boulevard* station located on the southwest corner of the intersection of Prairie Avenue and Manchester Boulevard providing service to the Forum and the LASED at Hollywood Park including SoFi Stadium and existing and future local businesses and residences.
- The *Prairie Avenue/Hardy Street* station located on the northwest corner of the intersection of Prairie Avenue and Hardy Street providing service to the LASED at Hollywood Park, including SoFi Stadium, the IBEC, and other existing and future local businesses and residences.

These station locations were chosen to be near major employment, housing, and retail centers, including the Forum, the LASED, including SoFi Stadium, and other employment, housing and retail commercial uses in the Hollywood Park Specific Plan (HPSP), the IBEC, and employment, housing and retail commercial uses in Downtown Inglewood, which the City is seeking to enhance and activate.

Existing roadways and infrastructure along the transit alignment will require reconfiguration to accommodate the new elevated transit guideway structures and stations. In addition to surface improvements, utility infrastructure located under roadways may need to be relocated to accommodate the guideway columns, footings, and other components. The roadway reconfigurations proposed along Market Street, Manchester Boulevard, and Prairie Avenue are necessary to assure that the existing roadway travel capacity is not reduced to accommodate the proposed Project.

The proposed Project includes a Maintenance and Storage Facility (MSF) to provide regular and preventive maintenance for the ATS trains, vehicle storage, and an operations control center located on the eastern half of the block bound by Manchester Boulevard, Hillcrest Boulevard, Nutwood Street and Spruce Avenue. An existing commercial building containing a Vons grocery store, a fitness center, and a bank branch, is located on the southern portion of this site. A gas station operated by Vons is located on the northeast portion of this site. Demolition of the existing commercial building and gas station are proposed

1.0 Introduction and List of Commenters

as part of the Project. A new Vons replacement store is proposed on the corner of Manchester Boulevard and Hillcrest Boulevard.

The proposed Project also includes two power distribution system (PDS) substations. These PDS substations will provide the necessary power for the proposed Project including traction power, auxiliary power, and housekeeping power for the stations and related infrastructure. One of the PDS substations will be located on the MSF site, where the Southern California Edison (SCE) service connection will be provided. The second PDS substation will be located on the Prairie Avenue/Manchester Boulevard Station site or the Prairie Avenue/Hardy Street station site.

Additional public parking would be provided as part of the proposed Project at three locations that are proposed for acquisition for use as construction staging areas. After construction, these sites will be improved as public parking lots:

- Approximately 650 parking spaces would be provided in a surface parking lot at the Market Street/Florence Avenue Station along with pick-up and drop-off areas on Locust Avenue and Regent Street.
- Approximately 50 parking spaces would be provided in a surface parking lot at 150 S. Market Street.
- Approximately 80 parking spaces and a shuttle bus pick-up and drop-off area are proposed at the Prairie Avenue/Hardy Street Station. This lot would be used for public parking, TNCs and shuttle bus pick-up and drop-off operations during events.

These parking areas will provide public parking needed in the City to support use of the proposed Project, businesses, and the City's efforts to help revitalize the retail areas along Market Street. The proposed Project is designed and intended to extend the transit service provided by the Metro K Line to the major event venues and existing and planned residential and commercial uses in the City, and these parking facilities are proposed to support transit use. On non-event days, the parking is designed to allow the City's residents to become transit riders and use the Metro Rail system, providing local convenient parking adjacent to the ITC and Metro K Line. Moreover, on event days, the City recognizes that many visitors may still drive to the City in search of convenient parking with proximity to commercial uses and access to a direct transportation connection to the City's major event venues. To help with overall traffic congestion and improve circulation on local streets, and to help reduce visitors parking in residential areas, the City proposes to provide parking in close proximity to the proposed Project stations and downtown Market Street area. These parking areas will also provide replacement parking for public parking on streets that may be removed as part of the proposed Project.

### 1.3 PROJECT ACTIONS

The proposed Project would require a number of actions and reviews by the City, acting as Lead Agency, and other local, regional, and state agencies acting as Responsible Agencies as described below.

- Although the Proposed Project is exempt from CEQA under Public Resources Code section 21080, subdivision (b)(12), if the City approves the Project, the City would voluntarily certify the Final EIR for the Inglewood Transit Connector Project and adopt of the Mitigation Monitoring and Reporting Plan, CEQA Findings of Fact, and, if there are significant and unavoidable environmental impacts, adopt a Statement of Overriding Considerations;
- Approval of the proposed General Plan Amendment, consisting of changes to the City General Plan Land Use Element, Circulation Element, and Safety Element;
- Approval of an amendment to Chapter 12 (Planning and Zoning) of the Inglewood Municipal Code to:
  - Add the Transportation Corridor Overlay (T-C-O) Zone; and
  - Amend the Medical Enterprise Overlay Zone to exclude properties within the Project alignment.
- Approval of amendments to the Forum Development Agreement to reflect the acquisition of frontage along Prairie (including loss of Forum parking);
- Approval of a Special Use Permit required for demolition of a gas station, Design Review for the new supermarket, and any other discretionary approval required for a new supermarket at 500 and 510 East Manchester Boulevard;
- Approval of amendments and clarifications to the Hollywood Park Specific Plan and associated Development Agreement;
- Preparation of a Project-specific Stormwater Management Plan or Standard Urban Stormwater Mitigation Plan for approval;
- Approvals of lot line adjustment(s), parcel map(s), and tract map(s) as needed;
- Approval of agreements and/or resolutions necessary to acquire the property necessary for construction and operation of the Project, in fee simple or through easements, licenses, air rights, leases, or other means of access, including through eminent domain;
- Approval of the ITC Design Guidelines;
- Approval of a contract or contracts for the design, finance, construction, and operation of the proposed Project; and
- Approvals for federal, State, or local financing plans or grants.

In addition to the above, ministerial approvals may be required as follows:

- Grading permits, building permits, haul route approval, and other permits issued by the Department of Building and Safety for the Project and any associated Department of Public Works permits (including encroachment permits) for infrastructure improvements;
- Tree removal permits; and
- Noise permit for Construction and Building Hours extension.
- Other federal, State, or local approvals, permits, or actions that may be deemed necessary for the Project including, but not limited to, the following:
  - California Public Utilities Commission;
  - Los Angeles County Fire Department.

### 1.4 ORGANIZATION OF THE FINAL EIR

**Section 1.0: Introduction and List of Commenters.** This section summarizes the Project under consideration and describes the contents of the Final EIR. This chapter also contains a list of all of the agencies or persons who submitted comments on the Recirculated Draft EIR during the public review period, presented in order by federal, State, and local agency; tribal entity; organization; individual; and date received.

**Section 2.0: Revisions to the Recirculated Draft EIR.** This section describes changes and refinements made to the proposed Project since publication of the Recirculated Draft EIR. These refinements, clarifications, amplifications, and corrections, which are described in the beginning of the section, would not change the environmental analysis and conclusions presented in the Recirculated Draft EIR for the reasons discussed in this section. This section also summarizes text changes made to the Recirculated Draft EIR in response to comments. Changes to the text of the Recirculated Draft EIR are shown by either ~~strike through~~ where text has been deleted, or double underline where new text has been inserted.

**Section 3.0: Comments and Responses.** This section contains the comment letters received on the Recirculated Draft EIR, followed by responses to individual comments.

This section includes copies of the comment letters received by the City of Inglewood (City) on the Recirculated Draft EIR. Each letter is numbered and identified for reference and the individual comments in each letter are also identified by number. Each comment letter is followed by written responses to each of the comments in that letter.

Some comments that were submitted to the City do not pertain to substantial environmental issues or do not address the adequacy of the analysis contained in the Recirculated Draft EIR. Responses to such comments, though not required, are included to provide additional information. When a comment does

not directly pertain to environmental issues analyzed in the Recirculated Draft EIR, does not ask a question about the adequacy of the analysis contained in the Recirculated Draft EIR, expresses an opinion related to the merits of the proposed Project, or does not question an element of or conclusion of the Recirculated Draft EIR, the response notes the comment and may provide additional information where appropriate. Many comments express opinions about the merits or specific aspects of the proposed Project and these are included in the Final EIR for consideration by the decision makers.

**Section 4.0: Mitigation Monitoring and Reporting Program.** This section contains the Mitigation Monitoring and Reporting Program (MMRP) to guide the City in its implementation and monitoring of measures adopted in the EIR, and to comply with the requirements of Public Resources Code section 21081.6, subdivision (a).

## 1.5 PUBLIC PARTICIPATION AND REVIEW

The City of Inglewood has complied with all noticing and public review requirements of CEQA. This compliance included notification of all responsible and trustee agencies and interested groups, organizations, and individuals that the Recirculated Draft EIR was available for review. The following list of actions took place during the preparation, distribution, and review of the Recirculated Draft EIR:

- In 2017, the City partnered with Metro to address the City's critical mobility issues by analyzing viable transit connection options from the Metro K Line to the LASED, which includes SoFi Stadium. With the City's input, Metro conducted a study<sup>1</sup> to explore how best to extend the Metro Rail system via a high-capacity transit connection to the LASED.
- In early 2018, the City also initiated stakeholder outreach to understand the City's need for a comprehensive long-range mobility plan, potential project goals and objectives, potential project benefits and impacts, and stakeholder concerns.
- In July 2018, pursuant to the requirements of the California Environmental Quality Act (CEQA), the City as the Lead Agency prepared a Notice of Preparation (Original NOP) and an Initial Study (Original IS) (SCH 2018071034).
- The Original NOP and IS were circulated and comments were received from the public and agencies following a 30-day comment period that ended on August 15, 2018.
- A scoping meeting was held on July 26, 2018, from 6 PM to 8 PM at the Inglewood Senior Citizens Center, 111 N. Locust Street, Inglewood, CA 90301. The City provided the opportunity for comments to be submitted at the scoping meeting.

<sup>1</sup> Los Angeles County Metropolitan Transportation Authority, *City of Champions/Inglewood (NFL) Focused Analysis of Transit Connection* (August 2017).

- As a result of the comments received and refinements and modifications to the proposed Project identified in the Original NOP and Original IS after circulation of the July 2018 Notice of Preparation, a Revised NOP and IS were circulated for public review and comment from September 10, 2020 to October 12, 2020. The City submitted both the Original and Revised NOPs and Initial Studies to the Governor's Office of Planning and Research (OPR); applicable trustee or responsible federal, State, regional, and local agencies identified for the proposed Project, including adjacent cities and counties; the County of Los Angeles; relevant Native American tribes; and all interested parties requesting such notice to allow for comment on the IS during the 30-day comment period. In addition, copies of the Original and Revised NOPs and ISs were made available for review at Inglewood City Hall and the Inglewood Public library, as well as on the City's website, to give the public the opportunity to comment during the respective 30-day comment periods.
- The City prepared and released a Draft EIR for public review in December 2020. Based on additional feedback received during the Draft EIR circulation period the City continued further collaboration with key stakeholders on the design of the Project. City also conducted additional technical analysis and due diligence on potential utility conflicts, property impacts, and potential impacts to historical resources, and refined the project to reduce the project footprint where feasible.
- As a result of this ongoing consultation process, the City has further refined the Project and revised the Draft EIR to evaluate these changes to the Project. The City prepared and released a Recirculated Draft EIR for public review in November 2021. The Project remains an approximately 1.6-mile long alignment with 3 stations beginning at the intersection of Market Street and Florence Avenue, continuing along Manchester Avenue and Prairie Avenue, and ending at the intersection of Prairie Avenue and Hardy Street.
- A Notice of Completion (NOC) and copies of the Draft EIR were filed with SCH on November 12, 2021. An official 45-day public review period for the Draft EIR was established by SCH, ending on December 27, 2021. A Notice of Availability (NOA) for the Draft EIR was published on November 11, 2021 and sent to appropriate public agencies, including SCH and Los Angeles County Clerk, and all entities who requested to be notified about the Proposed Project and/or EIR. The Recirculated Draft EIR was also published on the City's website.
- A virtual public meeting to provide project information on the Project and Recirculated Draft EIR was held on November 11, 2021, from 6 PM to 7 PM.

## 1.6 PROJECT MODIFICATIONS IN THE FINAL EIR

Project modifications implemented as part of the Final EIR include: (1) revisions to the location of power distribution system (PDS) substations, and (2) revisions to the Construction Commitment Program (CCP), specifically the Business Assistance Fund Program, Construction Staging & Traffic Control Program, Air Quality Program, Visual Resources Program, Hazardous Materials Program, and Noise and Vibration Control Program.

1.0 Introduction and List of Commenters

These minor modifications to the Proposed Project do not necessitate further recirculation of the Recirculated Draft EIR. Under section 15088.5 of the CEQA Guidelines,<sup>2</sup> recirculation of an EIR is required when “significant new information” is added to the EIR after public notice is given of the availability of the Draft EIR for public review but prior to certification of the Final EIR. The term “information” can include changes in the project or environmental setting, as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.
4. The DEIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Recirculation is not required to address the modifications to the Proposed Project. The modifications, which were made as a result of public and stakeholder feedback on the Proposed Project and the Recirculated Draft EIR, primarily further reduce the Proposed Project’s potential impacts and do not increase any of the significant impacts of the Proposed Project identified in the Recirculated Draft EIR or result in any new previously unidentified significant impact. Therefore, recirculation of the Recirculated Draft EIR is not required to address the modifications to the Proposed Project.

1.7 LIST OF COMMENTERS

The City of Inglewood received 21 comments in response to the Recirculated Draft EIR. **Table 1: Comment Letters Regarding the Recirculated Draft EIR** displays the numerical designation, entity, author, and date of each comment.

2 CEQA Guidelines, Section 15088.5, subd. (a).

1.0 Introduction and List of Commenters

Table 1-1  
Comment Letters Regarding the Recirculated Draft EIR

Letter No.	Entity	Name of Commenter	Date of Comment
<b>Public Agencies</b>			
1	California Department of Transportation, District 7	Miya Edmondson, IGR/CEQA Branch Chief	December 8, 2021
2	City of Torrance	David Mach, Senior Business Manager, Transit Planning	December 2, 2021
3	Inglewood Unified School District	Dr. Erika F. Torres, County Administrator	December 19, 2021
4	Los Angeles County Fire Department	Ronald M. Durbin, Chief, Forestry Division	December 8, 2021
5	Los Angeles County Sanitation District Email	Mandy Huffman, Environmental Planner	December 23, 2021
6	Los Angeles County Sanitation District Letter	Mandy Huffman, Environmental Planner	December 23, 2021
7	West Basin Municipal Water District	Uzi Daniel, Manager of Operations	December 7, 2021
8	Los Angeles Metropolitan Transportation Authority	Alison Yoh, Shine Ling	December 27, 2021
<b>Public</b>			
9	Aero Collective	Andrew Crane	December 2, 2021
10	Miracle Theater	Owen Smith	December 1, 2021
11	Glaser Weil/TSA	Elisa Paster	December 22, 2021

1.0 Introduction and List of Commenters

Letter No.	Entity	Name of Commenter	Date of Comment
12	Urban Ropeways Project Manager	Frederic Demoulin	December 27, 2021
13	FASTSIGNS	Eric Baines, Owner	December 2, 2021
14	Apartment Complex	Arthur Dawson	November 22, 2021
15	South Bay Workforce Investment Board	Jan Vogel, Executive Director	December 14, 2021
16	Community Fellowship Church	Bishop Robert Douglas, Jr., Director	December 14, 2021
17	-	Patricia Patrick	December 1, 2021
18	-	Tina McKinnor	December 13, 2021
19	Forum Entertainment, LLC.	Geni Lincoln, General Manager & Senior Vice President	December 27, 2021
20	Los Angeles Conservancy	Adrian Scott Fine, Senior Director of Advocacy	December 27, 2021
21	Hollywood Park Land Company, LLC.	Jason Gannon, Managing Director at SoFi Stadium	February 8, 2022

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1.0-10

Inglewood Transit Connector Project  
February 2022

2.0 REVISIONS TO THE RECIRCULATED DRAFT EIR

2.1 INTRODUCTION

The City of Inglewood (City), acting as the Lead Agency for the planning and environmental review of the proposed Project, has prepared this Final Environmental Impact Report (EIR) pursuant to the requirements of the California Environmental Quality Act (CEQA). In accordance with the CEQA Guidelines Section 15132 (a), this section of the Final EIR provides changes to the Recirculated Draft EIR (RDEIR) that have been made to clarify, correct, or supplement the environmental impact analysis for the proposed Project. Such changes are a result of recognition of inadvertent errors or omissions as well as public and agency comments received in response to the RDEIR. The changes described in this section do not result in any new or increased significant environmental impacts that would result from the proposed Project.

2.2 TEXT CHANGES TO THE RECIRCULATED DRAFT EIR

Provided below are corrections and additions to the RDEIR including, where appropriate, the associated technical appendices. Changes are identified below by the corresponding Recirculated Draft EIR section and subsection, if applicable, and the page number. Additions are double underlined and deletions are shown in ~~strikethrough~~ format. It should also be noted that in response to comments received on the Recirculated Draft EIR and community and stakeholder outreach, modifications to the Construction Commitment Program (CCP), provided in **Appendix D** were made. These changes are summarized in the relevant responses to comments, as applicable.

Section 1.0 Executive Summary

The following revision has been made to Page 1.0-11, List Bullets 2, 5, 9 and 10 of the RDEIR:

As part of the Project, the City of Inglewood has developed a Construction Commitment Program to proactively address the effects of the construction of the Project on the community. This program, provided in **Appendix D**, includes the following programs and plans:

- Business Community and Support Program
- Business ~~Interruption~~ Assistance Program
- Transit Access and Circulation Program
- Construction Staging and Traffic Control Program
- Pedestrian Access Program
- Parking Management Plan
- Air Quality Program

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2.0-1

Inglewood Transit Connector Project  
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2.0 Revisions to the Draft EIR

- Visual Resources Program
- Hazardous Materials Program
- Construction Noise Control Plan
- Construction Vibration Reduction Plan
- Tree Removal and Replacement Plan

The following revision has been made to Page 1.0-13, List Bullet 8 of the RDEIR:

- Power Distribution System (PDS) substations located on the MSF and the Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard station sites to provide traction/propulsion power, auxiliary power, and housekeeping power:

The following revision has been made to Page 1.0-18, Paragraph 2, Line 9 of the RDEIR:

During construction, the proposed Project would generate a demand for 165,115 kWh of electricity and up to 163.7 million gallons of petroleum each year. Electricity for operation of the proposed ATS system would be provided via two power distribution system (PDS) substations. One of the PDS substations would be located on the MSF site. The second PDS substation would be located on the Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard station site. The electricity demand for the proposed Project during normal operation would be 27.1 million kWh (27.1 GWh) per year.<sup>1</sup>

The following revision has been made to PDF AES-1 in **Table 3.0-1** on Page 1.0-37 of the RDEIR:

**PDF AES-1 Construction (CCP)**

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 will be limited to the amount necessary to safely perform the required work and will 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.

1 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021.

2.0 Revisions to the Draft EIR

- Construction night lighting shall be shielded to prevent a direct view of the light sources from residential properties with a property boundary that is within 150 feet of the construction site.
- 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.

The following revision has been made to PDF AQ-1 in **Table 3.0-1** on Page 1.0-46 of the RDEIR:

**PDF AQ-1 Construction Air Quality Program**

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.
- Dust shall be controlled per local ordinances. The Contractor shall be responsible for excessive dust or construction debris that results in impacts to adjacent residences or private vehicles, including taking responsibility for clean-up and addressing complaints brought to the project.
- All trucks carrying fill materials, debris, or similar materials shall secure and cover loads to prevent dust or debris while travelling on public right of ways.
- All trucks removing materials from the site will be loaded within the site perimeter and will be required to cover loads as deemed necessary for dust control.
- Material stockpiles and construction area surfaces shall be covered and/or watered as needed to prevent dust at designated construction areas.
- 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.
- Contractors shall maintain and operate construction equipment to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications and documentation demonstrating proper maintenance, in accordance with the manufacturer's specifications, shall be maintained on site. Tampering with construction equipment to increase horsepower or to defeat emission control devices must be prohibited.
- Require in all applicable bid documents, purchase orders, and contracts of the requirement to notify all construction vendors, contractors, and/or haul truck operators that vehicle and construction equipment idling time will be limited to no longer than five minutes, consistent with the CARB's policy. For any idling that is expected to take longer than five minutes, the engine should be shut off. Notify construction vendors, contractors, and/or haul truck operators of these idling requirements at the time that the purchase order is issued and again when vehicles enter the Project area. To further ensure that drivers understand the vehicle idling requirement, post signs at the proposed Project entry gates and throughout the Project alignment, where appropriate, stating that idling longer than five minutes is not permitted.

The following revision has been made to PDF HAZ-1 in **Table 3.0-1** on Page 1.0-63 of the RDEIR:

**PDF HAZ-1 Hazardous Materials Program**

The following practices will be followed during construction to address the potential for encountering hazardous materials during construction of the Project.

- Building Demolition Plan – Prior to any demolition occurring, conduct an evaluation of all buildings built prior to 1980 to be demolished to identify the presence of asbestos containing materials (ACMs) and lead-based paint (LBP). Remediation shall be implemented in accordance with the recommendations of these evaluations to ensure that no ACMs or LBP remain present and to ensure ACMs and LBP are removed to levels established for public safety.
- Hazardous Materials Contingency Plan – Prior to construction, prepare a plan addressing the potential for discovery of unidentified underground storage tanks (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 materials encountered during construction are removed to levels established for public safety.
- Soil Management Plan – After final construction plans are prepared showing the lateral and vertical extent of soil excavation during construction are prepared, prepare a Soil Management Plan to 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.

- Health and Safety Plan – Prior to construction, prepare a Health and Safety Plan to address the potential for exposure to any constituents of concern that may be encountered during construction.
- Utility Relocation Work - All Project utility relocations in the vicinity of Kelso Elementary School shall be designed and constructed to remain within the public right-of-way and not impact school property. Relocations shall be located further away from the school as feasible and designed and constructed to current standards to assure that they create no unacceptable hazards to the school. During Project construction, any open trenches and construction equipment shall be marked and barricaded such that they are not accessible by the students or create any potential hazard to school operations. Project utility relocations or cut overs that may require disruption to school normal utility services shall be scheduled to occur outside of normal school hours with advanced notification to the School District.

The following revision has been made to PDF NOISE-1 in **Table 3.0-1** on Page 1.0-66 of the RDEIR:

**PDF-NOISE-1 Construction Noise Control Plan (CCP)**

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.

- Staging of construction material deliveries behind fencing to minimize noise emitting from idling vehicles.
- On site-signage reminding workers to minimize noise generation.
- When not in use or being staged, heavy equipment shall be located as far as practicable from sensitive receptors.
- For project foundations, consider the use of drilled piles or sonic pile drivers or vibratory pile drivers instead of traditional impact pile drivers, as permitted by geological conditions.
- Sequence noisy activities to occur during the same general time period during daytime hours to the extent practical.
- Select quieter demolition methods where appropriate and feasible such that demolition activities can remain within the project specified noise levels.
- Unless deemed infeasible for a particular construction activity, the Contractor shall utilize rubber tire earth moving equipment in lieu of track mounted earth moving equipment.
- Construction material deliveries shall take place within designated construction staging areas as far from residential sites as practical to minimize noise impacts.
- Provide signage at active construction sites and staging areas reminding workers, equipment operators and delivery vehicles to minimize noise levels to the extent possible.
- Rumble strips or signage shall be provided at roadway access points into contractor laydown and staging areas to slow construction vehicles and limit vehicle noise.
- Coordinate with the Inglewood Unified School District administrators to avoid disruptive noise during school hours, including scheduling heavy equipment such as cranes, haul trucks, concrete trucks, concrete pumps, pneumatic equipment, earth moving vehicles or similar to operate outside of school hours. The City shall require that the Project's construction noise during school hours would be limited to 5 dBA Leq 1-hour above the measured ambient noise levels at Kelso School property line as identified in the RDEIR. Activities that would exceed this threshold shall be scheduled to occur outside of normal school hours or mitigated with specific mitigation measures such as temporary sound walls, sound blankets, or other sound-attenuating devices. The City shall monitor the Project's construction noise levels during school hours to assure compliance. As requested by the District, monthly noise monitoring reports on noise levels during school hours at Kelso School will be provided to the District.

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.

The following revision has been made to PDF NOISE-2 in **Table 3.0-1** on Page 1.0-69 of the RDEIR:

#### **PDF NOISE-2 Construction Vibration Reduction Plan (CCP)**

Prior to the issuance of any demolition or construction permit for each phase of the 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 to ensure impacts from ground borne vibration are less than significant:

- 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 project activities.
  - Crack gauges shall be installed on multiple representative cracks, particularly on sides of the building facing the 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 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 Joint Powers Authority and/or 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 Joint Powers Authority and/or 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 post-construction 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 Project and/or show how the 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 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 (1) 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.

The following revision has been made to PDF TRANS-2 in Table 3.0-1 on Page 1.0-74 of the RDEIR:

**PDF TRANS-2 Construction Staging and Traffic Control Program**

A Construction Staging and Traffic Control Program will be developed by members of the Project Task Force (as defined in the CCP), subject to review and acceptance by the City and/or the JPA, and will address the following topics:

- Coordination with other public infrastructure projects within the City's boundaries.

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- Detour routes, including analysis of impacts to pedestrian, business, bicycle, transit 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 will be ~~updated~~ developed as needed based on the following principles:

- 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 should 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.

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- 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.
- Entry and exit to the Market Street/Florence Avenue construction site shall be limited to right turns to/from Florence Avenue for large trucks, construction equipment, and material deliveries. An entrance off Locust Street between Florence Avenue and Regent Street will also be required to serve the contractor's offices and staging area. If required for phasing, the Locust Street entrance may also be used for large trucks, construction equipment, and material deliveries as approved by the City.

The following revision has been made to PDF TRANS-4 in **Table 3.0-1** on Page 1.0-77 of the RDEIR:

**PDF TRANS-4 Pedestrian Access Program**

A Pedestrian Access Program will be developed by members of the Project Task Force (as defined in the CCP), subject to review and acceptance by the City and/or the JPA, and will 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 Federal 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 Inglewood Unified School District 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.

**Section 2.0 Introduction**

The following revision has been made to Page 2.0-8, Paragraph 2, Line 8 of the RDEIR:

The City has also collaborated with the property and business owners along Market Street to refine the ITC Urban Design Guidelines and Standards to enhance harmony of the surrounding context and align with the City’s efforts to help revitalize the downtown Market Street area.

**Section 3.0 Project Description**

The following revision has been made to Page 3.0-5, Paragraph 5, Line 9 of the RDEIR:

The MSF will be designed in accordance with the Inglewood Transit Connector (ITC) Design Standards and Guidelines (Design Guidelines) (see section 3.5.8) which address the massing, façade, materials, colors, roof, and lighting for this facility, how the MSF will engage with the passenger and vehicular circulation around it, and sustainability features (see Appendix C: ITC Design Standards and Guidelines). The proposed Project also includes two power distribution system (PDS) substations. These PDS substations will provide the necessary power for the proposed Project including traction power, auxiliary power, and housekeeping power for the stations and related infrastructure. One of the PDS substations will be located on the MSF site, where the Southern California Edison (SCE) service connection will be provided. The second PDS substation will be located—either on the Prairie Avenue/Hardy Street station, or on the Prairie Avenue/Manchester Boulevard station site. The final location of the second PDS substation will be determined at time of design. The difference in impacts resulting from either PDS substation location option is negligible.

The following revision has been made to Page 1.0-13, List Bullet 2, Line 3 of the RDEIR:

- PDS substations located on the MSF and the Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard station sites to provide traction/propulsion power, auxiliary power, and housekeeping power;

The following revision has been made to Table 3.0-1 on Page 3.0-14 of the RDEIR:

**Table 3.0-1  
ITC Project Component Locations and Sizes (Conceptual)**

Project Component	General Location	Approximate Size
<b>Guideway</b>	<ul style="list-style-type: none"> <li>• Located predominantly within the existing public right-of-way of Market Street, Manchester Boulevard, and Prairie Avenue</li> <li>• The Prairie/Manchester and Prairie Hardy stations are proposed to be located on private property located west of Prairie Avenue proposed for acquisition as part of the Project.</li> </ul>	<ul style="list-style-type: none"> <li>• Approximately 1.6 miles dual lane, end to end</li> <li>• 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</li> <li>• 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.</li> </ul>
<b>stations</b>		
<i>Market Street/ Florence Avenue Station</i>	<ul style="list-style-type: none"> <li>• Located on private property (to be acquired by the City) at the southeast corner of Market Street/Florence Avenue</li> </ul>	<ul style="list-style-type: none"> <li>• Up to ~80 feet in height measured from existing grade to top of station canopy</li> <li>• ~75 feet wide (station structure and guideway only; not including vertical circulation)</li> <li>• ~200-foot long platform for train berthing</li> <li>• ~420-foot long mezzanine level for back of house and circulation</li> </ul>
<i>Prairie Avenue/ Manchester Boulevard Station</i>	<ul style="list-style-type: none"> <li>• Located on private property (to be acquired by the City) at the southwest corner of Prairie Avenue/Manchester Boulevard</li> </ul>	<ul style="list-style-type: none"> <li>• Up to ~80 feet in height measured from existing grade to top of station canopy</li> <li>• ~75 feet wide (station structure and guideway only; not including vertical circulation)</li> <li>• ~200-foot long platform for train berthing</li> <li>• ~360-foot long mezzanine level for back of house and circulation</li> </ul>
<i>Prairie Avenue/ Hardy Street Station</i>	<ul style="list-style-type: none"> <li>• Located on private property (to be acquired by the City) at the northwest corner of Prairie Avenue/Hardy Street</li> </ul>	<ul style="list-style-type: none"> <li>• Up to ~80 feet in height measured from existing grade to top of station canopy</li> <li>• ~75-foot wide (station structure and guideway only, not including vertical circulation)</li> <li>• ~200-foot long platform for train berthing</li> <li>• ~340-foot long mezzanine level for back of house and circulation</li> </ul>
<b>Vertical Circulation Elements</b>	<ul style="list-style-type: none"> <li>• Located at each station within the public right-of-way, easements, or private property to be acquired</li> <li>• Locations will depend on station specific requirements to connect to existing sidewalk/passenger walkways.</li> </ul>	<ul style="list-style-type: none"> <li>• Vertical circulation elements will exist at each station to provide access from the platform level to the mezzanine level and ground level</li> </ul>
<b>Elevated Passenger Walkways</b>	<ul style="list-style-type: none"> <li>• Location 1: above Florence Avenue connecting the Market Street/Florence Avenue Station to the Metro K Line Downtown Inglewood Station.</li> <li>• Location 2: above Prairie Avenue from Prairie/Manchester station to the Forum site</li> <li>• Location 3: above Prairie Avenue from Prairie/Hardy</li> </ul>	<ul style="list-style-type: none"> <li>• Height will be up to ~65 feet in height measured from existing grade to top of structure</li> <li>• ~30 feet wide maximum for passenger walkway</li> <li>• ~280 feet long for location 1 and ~160 feet long for locations 2 and 3</li> <li>• Minimum vertical clearance of 10 feet within the walkway interior</li> </ul>

Project Component	General Location	Approximate Size
Maintenance and Storage Facility (MSF)	station to the Hollywood Park site	
	<ul style="list-style-type: none"> <li>Specific locations will be determined at time of design and coordinated with stakeholders</li> </ul>	
Power Distribution System (PDS) Substation	<ul style="list-style-type: none"> <li>Primarily located on private property to be acquired by the City as part of the Project with potential for portions of the MSF to be located within an easement at 500 E. Manchester Boulevard</li> </ul>	<ul style="list-style-type: none"> <li>~75,000 sf building area</li> <li>Up to ~75 feet in height measured from existing grade to top of roof</li> <li>Surface parking area under building containing 50 spaces for employees and visitors</li> </ul>
	<ul style="list-style-type: none"> <li>Two PDS substations; one located at the MSF site and the second at the <del>Prairie/Hardy Station site</del> the Prairie Avenue/Hardy Street Station or the <u>Prairie Avenue/Manchester Boulevard Station</u>.</li> <li>Specific locations within each site will be determined during the design phase</li> </ul>	<ul style="list-style-type: none"> <li>~30 feet wide x ~100 feet long</li> <li>Up to ~20 feet clearance height measured from floor to ceiling</li> <li>If located below grade, an additional space of ~30 feet wide x ~30 feet long for vertical circulation</li> <li>~20 feet wide x ~40 feet long additional space for auxiliary equipment such as a backup generator, if necessary</li> </ul>
Roadway Improvements	<ul style="list-style-type: none"> <li>Market Street, Manchester Boulevard and Prairie Avenue</li> </ul>	<ul style="list-style-type: none"> <li>New roadway striping, lane re-configurations, partial relocation, on-street parking adjustments, new sidewalks, lighting improvements, traffic signal adjustments, landscaping, and streetscape</li> </ul>
Pick-Up/Drop-Off Areas, Surface Parking Lots and Staging Areas During Construction	<ul style="list-style-type: none"> <li>Market Street/Florence Avenue Station site</li> <li>150 S. Market Street</li> </ul>	<p>Surface level parking at each site:</p> <ul style="list-style-type: none"> <li>~650 spaces at Market Street/Florence Station</li> <li>~50 spaces at 150 S. Market Street</li> <li>~100 spaces at Prairie/Hardy Station</li> </ul> <p>Pick-Up/Drop-Off Area:</p> <ul style="list-style-type: none"> <li>Market Street/Florence Avenue Station site on Locust Street south of Florence Avenue, and Regent Street between Locust Street and Market Street</li> <li>Prairie/Hardy Street Station within the station site</li> </ul>

The following revision has been made to Page 3.0-36, Paragraph 1, Line 3-4 of the RDEIR:

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 Power Distribution System (PDS) substations located along the alignment. The two PDS substations would be located at the MSF and the Prairie Avenue/Hardy Street station or the Prairie Avenue/Manchester Boulevard station sites. The SCE service connection for the system would be provided to the PDS substation on the MSF site.

The following revision has been made to Page 3.0-75, List Bullets 2, 5, 9 and 10 of the RDEIR:

As part of the Project, the City of Inglewood has developed a Construction Commitment Program to pro-actively address the effects of the construction of the Project on the community. This program, provided in Appendix D, includes the following programs and plans:

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

The following revision has been made to Page 3.0-81, Lines 10 and 16 of the RDEIR:

The Prairie Avenue/Manchester Boulevard station and accompanying surface parking lot is proposed on two contiguous private parcels under common ownership that are on the southwest corner of the intersection of Prairie Avenue and Manchester Boulevard. Acquisition of these parcels is proposed. An elevated passenger walkway across Prairie Avenue to provide access to the Forum would also require an easement or partial acquisition on the Forum property for this passenger walkway connection. A PDS substation is proposed on this site or, in the alternative, on the Prairie Avenue/Hardy station site.

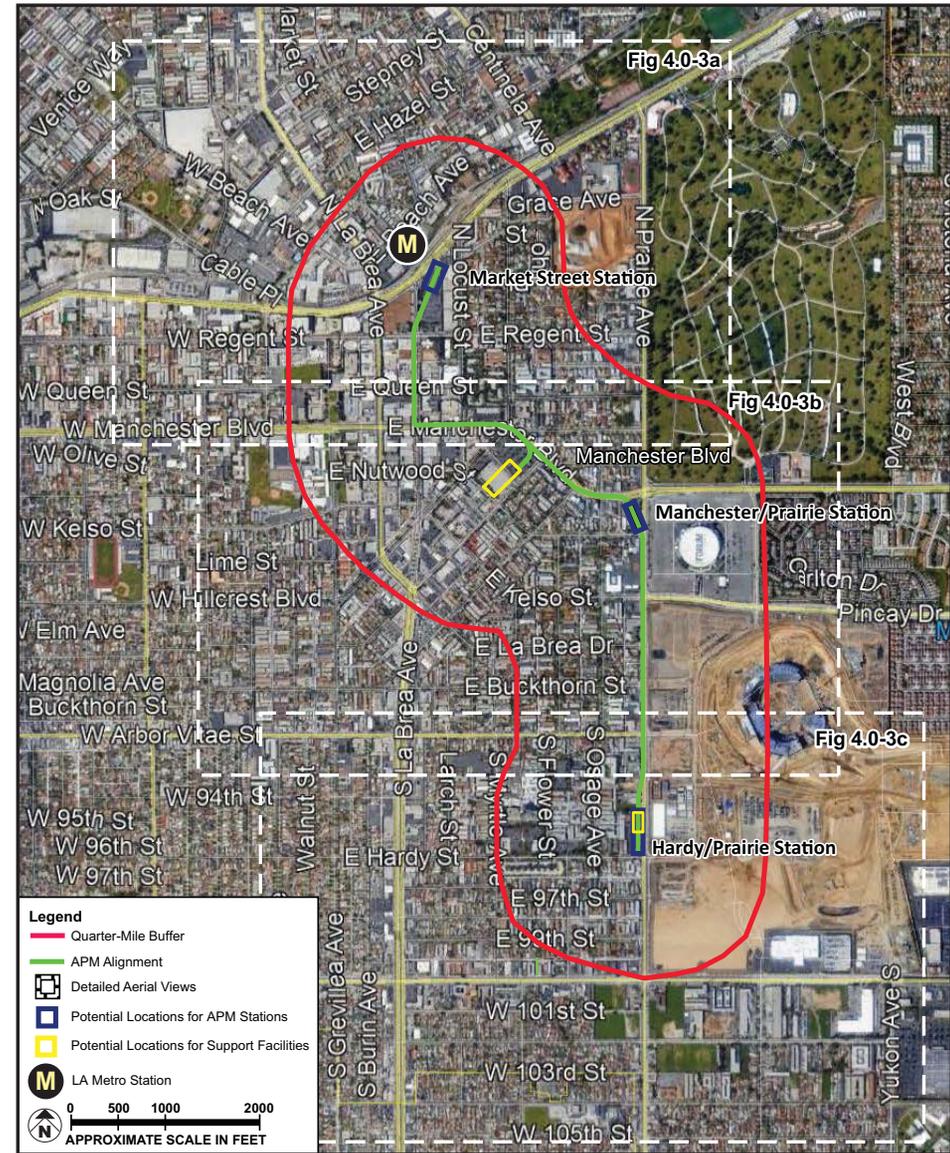
The Prairie Avenue/Hardy Street station and accompanying surface parking lot is proposed on two contiguous private parcels under common ownership located on the southwest corner of the intersection of Prairie Avenue and Hardy Street. Acquisition of these parcels is proposed. As shown in Table 3.0-5 and discussed in Section 3.6.1 above, acquisition (partial or full) of 7 additional parcels north of 1035 S. Prairie Avenue is also proposed to accommodate the guideway north of this station. A PDS substation is proposed on this site or, in the alternative, on the Prairie Avenue/Manchester Boulevard station site.

The following revision has been made to Page 3.0-83, List Bullet 4 of the RDEIR:

- Site preparation for installation of the PDS substations, electrical equipment, and subsystems will occur at the MSF site and the Prairie Avenue/Hardy Street Station or the Prairie Avenue/Manchester Boulevard Station Site.

### Section 4.0 Environmental Impact Analysis

The revision has been made to correct the potential location of PDS substations in **Figure 4.0-2: Map of Sensitive Receptors - Index**, **Figure 4.0-3b: Sensitive Receptors within a Quarter-Mile of the Project Area**, and **Figure 4.0-3c: Sensitive Receptors within a Quarter-Mile of the Project Area** on Pages 4.0-31, 4.0-33, and 4.0-34 of the RDEIR.



SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021

FIGURE 4.0-2



Map of Sensitive Receptors - Index



### Section 4.1 Aesthetics

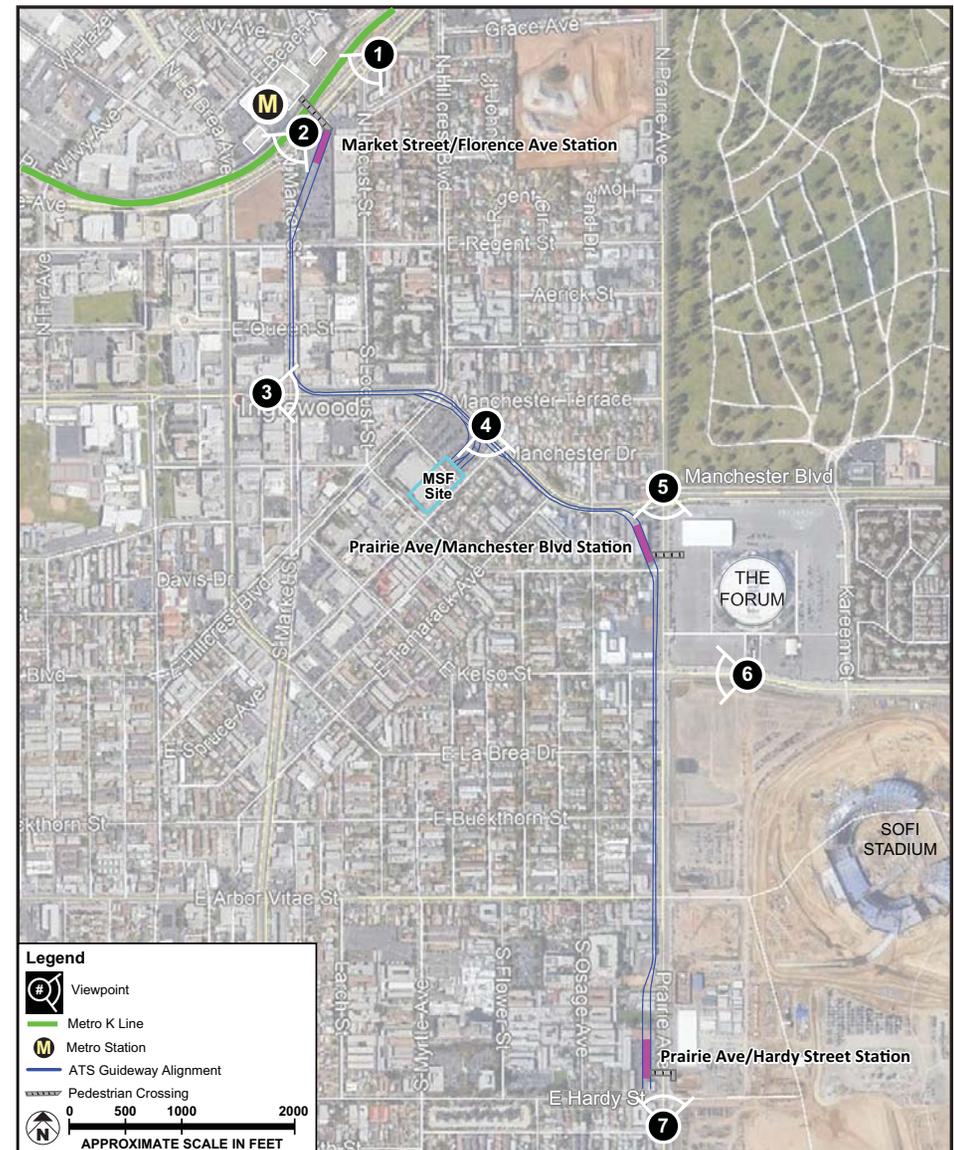
The following revision has been made to PDF AES-1 on Page 4.1-16 of the RDEIR:

**PDF AES-1 Construction (CCP)**

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 will be limited to the amount necessary to safely perform the required work and will 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.
- Construction night lighting shall be shielded to prevent a direct view of the light sources from residential properties with a property boundary that is within 150 feet of the construction site.
- 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.

The revision has been made to correct the location of Viewpoint 3 in **Figure 4.1-1: Viewpoint Location Map** on Page 4.1-24 of the RDEIR.



SOURCE: Google Earth - 2021; Meridian Consultants LLC - 2021 Illustrative and subject to adjustments as part of finalization during final design

**FIGURE 4.1-1**



251-004-21

**Viewpoint Location Map**

The following revision has been made on Page 4.1-20, Paragraph 5, Line 5 of the RDEIR.

After construction, the components of the proposed ATS system that would change the existing visual character along the proposed alignment would include the ATS guideway; stations including vertical circulation elements, elevated passenger walkways, parking and Pick-up/Drop-off sites; the MSF; two PDS substations proposed on the MSF site and Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard Station site; and the new Vons supermarket at the MSF site. The trains moving on the elevated ATS guideway, station structures, and associated signage would be visible from adjacent land uses and the surrounding neighborhoods. The shift of one of the existing travel lanes on Prairie Avenue by no more than thirty (30) feet into the existing setback area would also affect the existing visual character of this portion of Prairie Avenue.

The following revision has been made to Table 4.1-1 on Page 4.1-32 of the RDEIR:

**Table 4.1-1  
ITC Project Component Locations and Sizes (Conceptual)**

Project Component	General Location	Approximate Size
Guideway	<ul style="list-style-type: none"> <li>Located predominantly within the existing public right-of-way of Market Street, Manchester Boulevard, and Prairie Avenue</li> <li>The Prairie/Manchester and Prairie Hardy stations are proposed to be located on private property located west of Prairie Avenue proposed for acquisition as part of the Project.</li> </ul>	<ul style="list-style-type: none"> <li>Approximately 1.6 miles dual lane, end to end</li> <li>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</li> <li>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.</li> </ul>
	<b>stations</b>	
Market Street/ Florence Avenue Station	<ul style="list-style-type: none"> <li>Located on private property (to be acquired by the City) at the southeast corner of Market Street/Florence Avenue</li> </ul>	<ul style="list-style-type: none"> <li>Up to ~80 feet in height measured from existing grade to top of station canopy</li> <li>~75 feet wide (station structure and guideway only; not including vertical circulation)</li> <li>~200-foot long platform for train berthing</li> <li>~420-foot long mezzanine level for back of house and circulation</li> </ul>
Prairie Avenue/ Manchester Boulevard Station	<ul style="list-style-type: none"> <li>Located on private property (to be acquired by the City) at the southwest corner of Prairie Avenue/Manchester Boulevard</li> </ul>	<ul style="list-style-type: none"> <li>Up to ~80 feet in height measured from existing grade to top of station canopy</li> <li>~75 feet wide (station structure and guideway only; not including vertical circulation)</li> <li>~200-foot long platform for train berthing</li> <li>~360-foot long mezzanine level for back of house and circulation</li> </ul>
Prairie Avenue/ Hardy Street Station	<ul style="list-style-type: none"> <li>Located on private property (to be acquired by the City) at the northwest corner of Prairie Avenue/Hardy Street</li> </ul>	<ul style="list-style-type: none"> <li>Up to ~80 feet in height measured from existing grade to top of station canopy</li> <li>~75-foot wide (station structure and guideway only, not including vertical circulation)</li> <li>~200-foot long platform for train berthing</li> <li>~340-foot long mezzanine level for back of house and circulation</li> </ul>

Project Component	General Location	Approximate Size
Vertical Circulation Elements	<ul style="list-style-type: none"> <li>Located at each station within the public right-of-way, easements, or private property to be acquired</li> <li>Locations will depend on station specific requirements to connect to existing sidewalk/passenger walkways.</li> </ul>	<ul style="list-style-type: none"> <li>Vertical circulation elements will exist at each station to provide access from the platform level to the mezzanine level and ground level</li> </ul>
Elevated Passenger Walkways	<ul style="list-style-type: none"> <li>Location 1: above Florence Avenue connecting the Market Street/Florence Avenue Station to the Metro K Line Downtown Inglewood Station.</li> <li>Location 2: above Prairie Avenue from Prairie/Manchester station to the Forum site</li> <li>Location 3: above Prairie Avenue from Prairie/Hardy station to the Hollywood Park site</li> <li>Specific locations will be determined at time of design and coordinated with stakeholders</li> </ul>	<ul style="list-style-type: none"> <li>Height will be up to ~65 feet in height measured from existing grade to top of structure</li> <li>~30 feet wide maximum for passenger walkway</li> <li>~280 feet long for location 1 and ~160 feet long for locations 2 and 3</li> <li>Minimum vertical clearance of 10 feet within the walkway interior</li> </ul>
Maintenance and Storage Facility (MSF)	<ul style="list-style-type: none"> <li>Primarily located on private property to be acquired by the City as part of the Project with potential for portions of the MSF to be located within an easement at 500 E. Manchester Boulevard</li> </ul>	<ul style="list-style-type: none"> <li>~75,000 sf building area</li> <li>Up to ~75 feet in height measured from existing grade to top of roof</li> <li>Surface parking area under building containing 50 spaces for employees and visitors</li> </ul>
Power Distribution System (PDS) Substation	<ul style="list-style-type: none"> <li>Two PDS substations; one located at the MSF site and the second at the Prairie/Hardy Station site the Prairie Avenue/Hardy Street Station or the Prairie Avenue/Manchester Boulevard Station.</li> <li>Specific locations within each site will be determined during the design phase</li> </ul>	<ul style="list-style-type: none"> <li>~30 feet wide x ~100 feet long</li> <li>Up to ~20 feet clearance height measured from floor to ceiling</li> <li>If located below grade, an additional space of ~30 feet wide x ~30 feet long for vertical circulation</li> <li>~20 feet wide x ~40 feet long additional space for auxiliary equipment such as a backup generator, if necessary</li> </ul>
Roadway Improvements	<ul style="list-style-type: none"> <li>Market Street, Manchester Boulevard and Prairie Avenue</li> </ul>	<ul style="list-style-type: none"> <li>New roadway striping, lane re-configurations, partial relocation, on-street parking adjustments, new sidewalks, lighting improvements, traffic signal adjustments, landscaping, and streetscape</li> </ul>
Pick-Up/Drop-Off Areas, Surface Parking Lots and Staging Areas During Construction	<ul style="list-style-type: none"> <li>Market Street/Florence Avenue Station site</li> <li>150 S. Market Street</li> </ul>	<p>Surface level parking at each site:</p> <ul style="list-style-type: none"> <li>~650 spaces at Market Street/Florence Station</li> <li>~50 spaces at 150 S. Market Street</li> <li>~100 spaces at Prairie/Hardy Station</li> </ul> <p>Pick-Up/Drop-Off Area:</p> <ul style="list-style-type: none"> <li>Market Street/Florence Avenue Station site on Locust Street south of Florence Avenue, and Regent Street between Locust Street and Market Street</li> <li>Prairie/Hardy Street Station within the station site</li> </ul>

## Section 4.2 Air Quality

The following revision has been made to **Table 4.2-22** on Page 4.2-85 of the RDEIR to change “Off-site Worker” to “Proposed Residence” consistent with Table 19 in the proposed Project’s Air Quality and Health Risk Assessment Technical Report.

**Table 4.2-22**  
**Estimated Mitigated Health Impacts from Construction Activities for Morning/Night Scenario**  
**(Approximately 7:00 AM to 3:00 PM and 11:00 PM to 7:00 AM)**

Criteria	Cancer Risk	Chronic/Acute Impact
<b>Existing Off-site Residence</b>	8.18	<0.01
Significance Threshold	10	1.0
Threshold Exceeded?	No	No
<b>Off-site School/Daycare</b>	0.52	<0.01
Significance Threshold	10	1.0
Threshold Exceeded?	No	No
<b>Off-site Worker</b>	0.09	<0.01
Significance Threshold	10	1.0
Threshold Exceeded?	No	No
<b>Proposed Residence <del>Off-site Worker</del></b>	9.17	0.01
Significance Threshold	10	1.0
Threshold Exceeded?	No	No

Note: Values in **bold** are in excess of applicable standard.  
 Source: **Appendix G.1.**

The following revision has been made to PDF AQ-1 on Page 4.2-48 of the RDEIR:

### PDF AQ-1 Construction Air Quality Program

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.
- Dust shall be controlled per local ordinances. The Contractor shall be responsible for excessive dust or construction debris that results in impacts to adjacent residences or private vehicles, including taking responsibility for clean-up and addressing complaints brought to the project.

- All trucks carrying fill materials, debris, or similar materials shall secure and cover loads to prevent dust or debris while travelling on public right of ways.
- All trucks removing materials from the site will be loaded within the site perimeter and will be required to cover loads as deemed necessary for dust control.
- Material stockpiles and construction area surfaces shall be covered and/or watered as needed to prevent dust at designated construction areas.
- 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.
- Contractors shall maintain and operate construction equipment to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications and documentation demonstrating proper maintenance, in accordance with the manufacturer's specifications, shall be maintained on site. Tampering with construction equipment to increase horsepower or to defeat emission control devices must be prohibited.
- Require in all applicable bid documents, purchase orders, and contracts of the requirement to notify all construction vendors, contractors, and/or haul truck operators that vehicle and construction equipment idling time will be limited to no longer than five minutes, consistent with the CARB's policy. For any idling that is expected to take longer than five minutes, the engine should be shut off. Notify construction vendors, contractors, and/or haul truck operators of these idling requirements at the time that the purchase order is issued and again when vehicles enter the Project area. To further ensure that drivers understand the vehicle idling requirement, post signs at the proposed Project entry gates and throughout the Project alignment, where appropriate, stating that idling longer than five minutes is not permitted.

### Section 4.3 Biological Resources

The following revision has been made on Page 4.3-41, Paragraph 1, Lines 5 and 8 of the RDEIR.

The proposed Project would include two power distribution system (PDS) substations. These PDS substations will provide the necessary power for the proposed Project including traction power, auxiliary power, and housekeeping power for the stations and related infrastructure. One of the PDS substations will be located on the MSF site and the second PDS substation will be located on the Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard station site. As discussed above, the MSF site which includes the first PDS substation would be developed within an area included in the Downtown TOD Plan and would be subject to the tree requirements for this plan. The second PDS substation would be located

within the Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard station site which ~~is~~ are not located within a City plan but ~~is~~ are subject to the provisions of the IMC.

The following revision has been made on Page 4.3-49, Paragraph 4, Line 2 of the RDEIR.

As discussed previously, the PDS substations would be located within the MSF site and the Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard station site which are analyzed above. The PDS substations would involve the construction of new buildings and structures, some of which would have windows that could pose obstacles to migratory birds. However, as there are no native or nonnative vegetated corridors in the proximity of the proposed Project, the potential impact of these structures on migratory birds is anticipated to be minimal. During operation of the PDS substations, it is possible that migratory or nesting birds would build nests within or near the area. However, operation of the PDS substations would not substantially interfere with these nests once built as the majority of the Project components would remain stationary with exception of the ATS train cars.

The following revision has been made on Page 4.3-59, Paragraph 1, Line 2 of the RDEIR.

The proposed Project would include two PDS substations located at the MSF site and the Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard station site which are analyzed above.

**Section 4.4 Cultural Resources**

The following revision has been made on Page 4.4-2, Paragraph 2, Line 11 of the RDEIR.

Figure 4.4-1: Historic Resource Study Area identifies the Project Area and Expanded Study Area defined for purposes of the historic resource investigation. The Project Area includes all areas and parcels where new construction will occur. This includes the public rights-of-way along Market Street, Manchester Boulevard, and Prairie Avenue where the elevated ATS guideway will be constructed; the block bounded by Market Street, Florence Avenue, Locust Street, and Regent Street where the Market Street/Florence Avenue station would be constructed; parcels north of Florence Avenue where a pedestrian bridge from the Market Street/Florence Avenue station to the existing Metro K Line Downtown Inglewood station will land; the block bounded by Manchester Boulevard, Hillcrest Boulevard, Nutwood Street, and Spruce Avenue where the MSF and a PDS substation will be built; the parcel at the corner of southwest corner of Manchester Boulevard and Prairie Avenue where a station will be located; parcels at the northwest corner of Prairie Avenue and Hardy Street and of Prairie Avenue and Manchester Boulevard where a stations and a PDS substation will be located; and parcels east of Prairie Avenue between Manchester and Hardy where the travel lanes will be relocated to the east.

**Section 4.5 Energy Resources**

The following revision has been made on Page 4.5-2, Paragraph 4, Line 9 of the RDEIR.

After circulation of the December 2020 Draft EIR for public review, the City revised the design of the proposed Project in response to consultation with key stakeholders in the community and comments received on the December 2020 Draft EIR. Specific changes to the proposed Project include raising the height of the ATS guideway along Market Street to preserve existing views of historic buildings, relocating the Prairie Avenue/Pincay Drive Station to the southwest corner of Prairie Avenue and Manchester Boulevard, redesign of the proposed MSF to allow this facility to be located on the proposed site with a new Vons store, and realignment of the guideway and stations on Prairie Avenue to the west side of Prairie Avenue. In addition, the two power distribution system (PDS) substations are now proposed to be located on the MSF and Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard station sites. As it relates to energy impacts, these changes include updated construction and operational details which resulted in reductions of energy resource consumption compared to the December 2020 Draft EIR.

The following revision has been made on Page 4.5-27, Paragraph 2, Line 9 of the RDEIR.

Propulsion power (i.e., the power to run the train on a guideway) would be provided via two PDS substations located along the guideway alignment. Each PDS substation includes equipment to transform the medium- to high-voltage power feed provided from the power companies to the required 750-volt direct current (VDC) needed to power the vehicles and other ancillary equipment. The proposed Project's operating components would utilize electrical energy for the operation of the related support features, such as the ATS trains, stations, and MSF via electricity from the two PDS substations. For normal operations, the required load flow for power of the proposed Project would be divided between the two PDS substations. One of the PDS substations would be located on the MSF site. The second PDS substation would be located on the Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard station site. This includes operation of all interior and exterior lighting features included for the proposed Project. Power requirements for each PDS substation are provided in **Table 4.5-7: Proposed Project Normal Operation Load Flow.**

The following revision has been made to **Table 4.5-7** on Page 4.5-27 of the RDEIR.

**Table 4.5-7  
Proposed Project Normal Operation Load Flow**

PDS Site	Peak Power (KW)	RMS Power (KW)	Average Power (KW)	RMS Current (A)
MSF	2,008	834	755	1,067
Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard station	2,119	777	639	996

Source: Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021. Table 9-2.

Notes:  
 KW – kilowatt  
 RMS –The substitution load calculation output provides both per second and root mean squared (RMS) KVA loads for each substation.

The following revision has been made on Page 4.5-27, Paragraph 3, Line 2 of the RDEIR.

As shown, the proposed MSF PDS substation is estimated to have a peak power load flow of 2,008 kW, and the Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard station PDS substation is estimated to have a peak power load flow of 2,119 kW for a total of 4,127 kW.<sup>2</sup> The ATS trains would operate for 18 hours per day which would generate a total electricity demand of 74,286 kWh per day or 27,114,390 kWh (27.1 GWh) per year.<sup>3</sup>

The following revision has been made on Page 4.5-28, Paragraph 2, Lines 1 and 4 of the RDEIR.

In the event the MSF PDS substation is unable to operate, the Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard station PDS substation is estimated to have a peak power load of 4,152 kW which would generate a total electricity demand of 74,736 kWh per day or 27,278,640 kWh (27.3 GWh) per year. Similarly, in the event the Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard station PDS substation is unable to operate, the MSF PDS substation is estimated to have a peak power load of 4,353 kW which would generate a total electricity demand of 78,354 kWh per day or 28,599,210 kWh (28.6 GWh) per year.

The following revision has been made on Page 4.5-28, Paragraph 3, Line 7 of the RDEIR.

The electrical demand from the existing land uses to be removed to implement the Project is 6,489,214 kWh per year. As noted previously, the Vons store replacement would use 1,742,391 kWh of electricity per year. As shown in Table 4.5-8: Annual Electricity Use from Proposed Project Operation, the electricity demand for the proposed Project during normal operation would result in a net increase of 22,367,567 kWh (22.4 GWh) per year. In the event the MSF PDS substation is unable to operate, the electricity demand would result in a net increase of 22,531,817 kWh (22.5 GWh) per year. In the event the Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard station PDS substation is unable to operate, the electricity demand would result in a net increase of 23,852,387 kWh (23.9 GWh) per year. Should any of the uses that would be removed to implement the Project relocate within the City, the net

2. Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021.  
 3. Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021.

increase in energy shown in Table 4.5-8 would be reduced but in no event would the amount of electricity required exceed the total shown for the ATS system.

The following revision has been made to Table 4.5-8 on Page 4.5-28 of the RDEIR.

**Table 4.5-8  
 Annual Electricity Use from Proposed Project Operation**

Operation Scenario	Annual Electricity Usage (kWh/yr)		
	ATS System <sup>a</sup>	Existing <sup>b</sup>	Net Increase
Normal Operation	27,114,390	4,746,823	22,367,567
Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard station PDS Only	27,278,640	4,746,823	22,531,817
MSF PDS Only	28,599,210	4,746,823	23,852,387

Notes: kWh/yr = kilowatt-hours per year.  
<sup>a</sup> Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition - August 2021.  
<sup>b</sup> Existing data accounts for operation of the Vons store replacement.

### Section 4.6 Geology and Soils

The following revision has been made to Mitigation Measure (MM) GEO-1 on Page 4.6-22 of the RDEIR.

**MM GEO-1:** Project Design. 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 Automated Transit System (ATS) guideway shall be located to avoid or accommodate the fault rupture hazard where present with refinement of station and ATS guideway placement worked into final design as needed based on project specific geologic surveys, recommendations and criteria. 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.

## Section 4.8 Hazards and Hazardous Materials

The following revision has been made to PDF HAZ-1 on Page 4.8-26 of the RDEIR:

### PDF HAZ-1 Hazardous Materials Program

The following practices will be followed during construction to address the potential for encountering hazardous materials during construction of the Project.

- Building Demolition Plan – Prior to any demolition occurring, conduct an evaluation of all buildings built prior to 1980 to be demolished to identify the presence of asbestos containing materials (ACMs) and lead-based paint (LBP). Remediation shall be implemented in accordance with the recommendations of these evaluations to ensure that no ACMs or LBP remain present and to ensure ACMs and LBP are removed to levels established for public safety.
- Hazardous Materials Contingency Plan – Prior to construction, prepare a plan addressing the potential for discovery of unidentified underground storage tanks (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 materials encountered during construction are removed to levels established for public safety.
- Soil Management Plan – After final construction plans are prepared showing the lateral and vertical extent of soil excavation during construction are prepared, prepare a Soil Management Plan to 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.
- Health and Safety Plan – Prior to construction, prepare a Health and Safety Plan to address the potential for exposure to any constituents of concern that may be encountered during construction.
- Utility Relocation Work - All Project utility relocations in the vicinity of Kelso Elementary School shall be designed and constructed to remain within the public right-of-way and not impact school property. Relocations shall be located further away from the school as feasible and designed and constructed to current standards to assure that they create no unacceptable hazards to the school. During Project construction, any open trenches and construction equipment shall be marked and barricaded such that they are not accessible by the students or create any potential hazard to school operations. Project utility relocations or cut overs that may require disruption to school normal utility services shall be scheduled to occur outside of normal school hours with advanced notification to the School District.

The following revision has been made to PDF TRANS-4 on Page 4.8-29 of the RDEIR:

### PDF TRANS-4 Pedestrian Access Program

A Pedestrian Access Program will be developed by members of the Project Task Force (as defined in the CCP), subject to review and acceptance by the City and/or the JPA, and will 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 Federal 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 Inglewood Unified School District 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.

The following revision has been made on Page 4.8-36, List Bullet 3 of the RDEIR.

- Power Distribution System (PDS) Substations and Backup Power Generators. The MSF and Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard Station would each operate a PDS substation and power generator. Various chemicals would be used and stored, including but not limited to dielectric fluid, transformer oil, insulating oils, sulfuric acid, and sulfur hexafluoride in order to insulate and cool electrical conductors and operate the PDS substations. Diesel fuel would also be stored for the operation of the power generators.

The following revisions have been made on Page 4.8-41, List Bullets 2 and 3 of the RDEIR.

- Operations of the MSF and Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard Station would be subject to the requirements of programs administered by the LACoFD for storage of

all hazardous materials on site, including diesel fuel for the emergency generators, which would be required to adhere to a facility-specific HMBP.

- The MSF would require the use of equipment, tools, and materials for maintenance activities; these may also require the use of various materials and substances that would be considered hazardous. The PDS substations at the MSF and Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard Station would use and store bulk quantities of hazardous materials—such as fuel, solvents, oil, transmission fluid, paints, and other chemicals—that would have the potential to be released into the environment if not properly handled and stored. The proposed Project would comply with existing regulations governing the storage and handling of such chemicals, and applicable regulations to responding to accidental release of such chemicals.

## Section 4.9 Land Use

The following revision has been made on Page 4.9-24, Paragraph 5, Line 5 of the RDEIR.

Support facilities would include two power distribution system (PDS) substations. These substations would be the service connection point and would provide the necessary power for the proposed Project including traction power, auxiliary power and housekeeping power for the stations and infrastructure. One of the PDS substations would be co-located with the MSF and another would be located at Prairie Avenue/Hardy Street Station or Prairie Avenue/Manchester Boulevard.

The following revision has been made on Page 4.9-26, Paragraph 2, Line 5 of the RDEIR.

The Prairie Avenue Segment extends from the intersection of Prairie Avenue and Manchester Boulevard to just northwest of the intersection of Prairie Avenue and Hardy Street. As the guideway turns south, the Manchester Boulevard/Prairie Avenue station would be located on a vacant commercial site located on the southwest corner of Manchester Boulevard and Prairie Avenue at 401 Prairie Avenue that would be acquired as part of the Project. A PDS substation would also be located on this segment at the Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard Station.

The following revisions have been made on Page 4.9-43, Paragraph 2, Line 4 of the RDEIR.

The CCP includes the measures described below to minimize traffic interruptions during construction. Implementation of the Construction Staging and Traffic Control Program will maintain pedestrian and vehicular access throughout construction of the Project. Other measures included in the CCP, including the Business and Community Support Program and Business ~~Interruption~~ Assistance Program, will also minimize the effects of the construction of the Project on the community. While construction of the Project will result in temporary disruptions, construction of the Project will not create a physical division of the community that will result in a significant land use impact

The following revisions have been made on Page 4.9-42, Paragraph 3, Line 3 of the RDEIR.

The requirements set forth in the CCP, including the Transit Access and Circulation Program (CCP, Section 5.0), the Construction Staging & Traffic Control Program (CCP, Section 6.0), and the Business and Community Support Program (CCP, Section 2.0) and Business ~~Interruption~~ Assistance Program (CCP, Section 3.0) (see Appendix D) would continue to allow access within the Project area, including access to businesses at all times, and transportation related inconveniences would be reduced to the extent feasible and provide additional support for businesses. Efforts would be made to keep all traffic lanes open for peak directional travel. If all lanes cannot remain open, one lane would be kept open for peak direction and supplemented by detour options. Advanced notice of road closures and detours would be provided to the City and the community.

The following revisions have been made on Page 4.9-43, Paragraph 5, Line 4 of the RDEIR.

While access to some neighborhoods would be disrupted and detoured for short periods of time during construction, through implementation of the CCP access would continue to be available to neighborhoods for both residents and emergency response. In addition, the funding assistance provided as part of the CCP's Business ~~Interruption~~ Assistance Program would avoid indirect impacts on existing businesses from construction of the ITC Project. For these reasons, the proposed Project would not physically divide the existing community during construction and this impact is less than significant.

The following revisions have been made on Page 4.9-68, Line 3 of the RDEIR.

The conclusion of this economic study is that the ITC Project will not negatively impact the factors, including access and parking, visibility and safety, and quality of the public realm that will contribute to the economic viability of downtown Inglewood. This study also included a review of elevated transit systems with similar design features implemented in U.S. cities, which found no evidence that the introduction of these systems alone may lead to economic decline in downtowns. There is a potential for temporary effects on economic conditions in downtown during the approximate 46-month construction period for the Project. As noted under Impact LU-1, the Construction Commitment Program includes a Business and Community Support Program and a Business ~~Interruption~~ Assistance Program to assist all businesses financially affected by construction activities.

## Section 4.10 Noise

The following revisions have been made on Page 4.10-10, List Bullet 4 of the RDEIR.

- Site preparation for installation of the power distribution system (PDS) substations, electrical equipment, and subsystems will occur at the MSF site and Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard Station Site.

The following revision has been made on Page 4.10-44, Paragraph 1, Line 15 and List Bullet 3 of the RDEIR:

Land uses adjacent to and within a quarter mile radius of the proposed Project consisting of the guideway, stations and the MSF, include noise sensitive receptors where people normally sleep such as hotels and single and multifamily residences (identified as Category 2 uses), schools, places of worship, medical offices (identified as Category 3 uses). For the purpose of presenting the results of the potential noise impact analyses in this Recirculated Draft EIR, the land uses nearest to the proposed Project have been organized into groups by geographic proximity as shown in Figure 4.10-5: Noise Sensitive Receptor Groups. These receptor groups are used in this Recirculated Draft EIR to provide a representation of the potential noise impacts on noise-sensitive receptors around the proposed Project and represent the areas where baseline noise monitoring was conducted. Although the receptor groups shown do not include all the receiver points evaluated in the noise modeling analyses, these identified groups include all noise-sensitive receptors nearest to the proposed Project and represent the greatest potential for noise impacts. Adjacent commercial and industrial uses that are not noise-sensitive (specifically, receptor groups Site A – Commercial uses along E. Queen Street, Site D – Commercial uses along Prairie Avenue; lodging uses along W. Century Boulevard, Site E – Commercial and lodging uses along the southern portion of W. Century Boulevard, Site J – Commercial uses along E. Manchester Boulevard, and Site K – ~~Commercial~~ Residential uses along E. Regent Street) but considered vibration-sensitive (as discussed in more detail below), are also listed in the prior locations for informational purposes. As such, the areas where noise and vibration monitoring was conducted along the proposed alignment and stations are comprised of the following uses:

### Market Street Segment

- Site 1: Residential uses on the east side of N. Locust Street including the Holy Faith Episcopal Church, commercial uses on the west side of N. Locust Street;
- Site A: Commercial uses along E. Queen Street; and
- Site K: ~~Commercial~~ Residential uses along E. Regent Street.

The following revision has been made to PDF NOISE-1 on Page 4.10-61 of the RDEIR:

### PDF-NOISE-1 Construction Noise Control Plan (CCP)

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.
- Staging of construction material deliveries behind fencing to minimize noise emitting from idling vehicles.
- On site-signage reminding workers to minimize noise generation.
- When not in use or being staged, heavy equipment shall be located as far as practicable from sensitive receptors.
- For project foundations, consider the use of drilled piles or sonic pile drivers or vibratory pile drivers instead of traditional impact pile drivers, as permitted by geological conditions.
- Sequence noisy activities to occur during the same general time period during daytime hours to the extent practical.
- Select quieter demolition methods where appropriate and feasible such that demolition activities can remain within the project specified noise levels.

- Unless deemed infeasible for a particular construction activity, the Contractor shall utilize rubber tire earth moving equipment in lieu of track mounted earth moving equipment.
- Construction material deliveries shall take place within designated construction staging areas as far from residential sites as practical to minimize noise impacts.
- Provide signage at active construction sites and staging areas reminding workers, equipment operators and delivery vehicles to minimize noise levels to the extent possible.
- Rumble strips or signage shall be provided at roadway access points into contractor laydown and staging areas to slow construction vehicles and limit vehicle noise.
- Coordinate with the Inglewood Unified School District administrators to avoid disruptive noise during school hours, including scheduling heavy equipment such as cranes, haul trucks, concrete trucks, concrete pumps, pneumatic equipment, earth moving vehicles or similar to operate outside of school hours. The City shall require that the Project's construction noise during school hours would be limited to 5 dBA Leq 1-hour above the measured ambient noise levels at Kelso School property line as identified in the RDEIR. Activities that would exceed this threshold shall be scheduled to occur outside of normal school hours or mitigated with specific mitigation measures such as temporary sound walls, sound blankets, or other sound-attenuating devices. The City shall monitor the Project's construction noise levels during school hours to assure compliance. As requested by the District, monthly noise monitoring reports on noise levels during school hours at Kelso School will be provided to the District.

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.

The following revision has been made to PDF NOISE-2 on Page 4.10-63 of the RDEIR:

#### **PDF NOISE-2 Construction Vibration Reduction Plan (CCP)**

Prior to the issuance of any demolition or construction permit for each phase of the 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 to ensure impacts from ground borne vibration are less than significant:

- 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 project activities.
  - Crack gauges shall be installed on multiple representative cracks, particularly on sides of the building facing the 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 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 Joint Powers Authority and/or 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 Joint Powers Authority and/or 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 post-construction 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 Project and/or show how the 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 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 (1) 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.

The following revisions have been made on Page 4.10-102, Paragraph 1, Line 2 of the RDEIR.

The proposed Project will include two PDS substations. The identified PDS substation locations are the proposed MSF site and the Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard station. Each PDS substation includes equipment to transform the medium- to high-voltage power feed provided from the power companies to the required 750-volt direct current (VDC) needed to power the vehicles and other ancillary equipment. A description of the PDS substations is provided in Section 3.0, 3.5.5: Power Distribution System Substations.

The following revisions have been made on Page 4.10-102, Paragraph 3, Lines 9 and 12 of the RDEIR.

Noise from transformers and similar equipment at substations is usually a low-frequency (60 Hz) humming sound. Noise from fans and ventilation equipment at substation sites can also contribute to this source. Transformer noise will “transmit” and attenuate at different rates depending on the transformer size, voltage rating, and design. The substation would be the source of noise from what is termed corona discharge. Noise from corona discharge and similar electrical phenomena associated with high voltage transmission lines is heard as a cracking or hissing sound, which commonly varies with the humidity. While distinctive at a short distance, this noise is typically only about 40 to 50 dBA or less and would not be loud enough to cause a significant increase in noise levels at both the proposed MSF site and the Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard station. When taking into account the noise from the transmission line ranging from 40 to 50 dBA, this results in a maximum increase of 0.1 dBA Leq, which is technically considered not perceivable. With the concurrent operation of noise generated from the proposed MSF site and the Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard station, the noise levels generated by the transformers would be negligible. Additionally, as described previously, implementation of PDF NOISE-1 would require stationary noise source generated from mechanical equipment to be enclosed within a shed or barrier that would further reduce noise levels. Thus, the off-site PDS substations would result in a less than significant noise impact.

2.0 Revisions to the Draft EIR

The following revision has been made to change the existing land use at monitoring location “Site K” from “Public” to “Residential” in Tables 4.10-12, 4.0-13, 4.0-15, 4.0-16, 4.0-17, 4.0-18, 4.0-19, 4.0-20, 4.0-21, 4.0-22, 4.0-23, 4.0-24, and 4.10-25 on Pages 4.10-50, 4.10-52, 4.10-69, 4.10-71, 4.10-75, 4.10-77, 4.10-81, 4.10-83, 4.10-87, 4.10-89, 4.10-96, 4.10-100, 4.10-106 of the RDEIR.

Table 4.10-12  
Short-term (1-hour) Ambient Noise Measurements (Daytime)

Site	Approximate Address	Existing Land Use	Monitored Date	1-hour Leq (dBA)		Noise Exposure Compatibility Category
				AM Peak Hour	PM Peak Hour	
<b>Market Street Segment</b>						
J	201 Market Street	Commercial/Mixed Use	December 17, 2018 December 19, 2018	73.3 73.8	73.2 73.9	Normally Incompatible
K	205 Market Street	<del>Public</del> Residential	November 26, 2018 November 28, 2019	67.1 69.1	68.0 64.6	Clearly/Normally Compatible
A	300 Queen Street	Residential	November 26, 2018 November 28, 2018	64.2 63.5	64.1 64.6	Normally Compatible
<b>Manchester Boulevard Segment</b>						
L	3500 Manchester Boulevard	Residential	December 17, 2018 December 19, 2018	73.9 74.5	74.2 73.4	Normally Incompatible
I	500 Manchester Boulevard	Residential	December 11, 2018 December 13, 2018	69.5 67.6	66.6 67.8	Normally Compatible
B	712 Manchester Boulevard	Educational	December 11, 2018 December 13, 2018	72.1 76.1	71.2 72.9	Normally Incompatible
<b>Prairie Avenue Segment</b>						
G	629 Arbor Vitae Street	Residential	December 11, 2018 December 13, 2018	64.3 68.0	67.0 68.8	Normally Compatible
H	728 Kelso Street	Educational/Residential	December 17, 2018 December 19, 2018	68.1 65.4	69.1 67.6	Normally Compatible/Normally Incompatible
M	3681 Chapman Lane	Residential	December 17, 2018 December 19, 2018	72.8 73.2	75.9 76.6	Normally Incompatible
F	636 Hardy Street	Residential	January 21, 2019 January 23, 2019	62.7 71.5	63.8 70.9	Normally Compatible

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Site	Approximate Address	Existing Land Use	Monitored Date	1-hour Leq (dBA)		Noise Exposure Compatibility Category
				AM Peak Hour	PM Peak Hour	
C	823 Prairie Avenue	Place of Worship/Lodging	December 11, 2018 December 13, 2018	77.3 77.1	76.1 76.2	Normally/Clearly Incompatible
D	10023 Prairie Avenue	Lodging	November 27, 2018 December 4, 2018	75.1 74.4	78.5 75.4	Normally Incompatible
E	4020 Century Boulevard	Lodging	November 27, 2018 December 4, 2018	72.8 73.1	71.7 72.7	Normally Incompatible

Source: Refer to Appendix M.1-2: Short-term (1-hour) Ambient Noise Measurement (Daytime) for monitoring data sheets.  
 Note: Two sets of measurements were taken on non-successive days for each site. AM Peak hour measurements taking place between 7:00 AM to 10:00 AM. PM peak hour measurements took place between 4:00 PM to 7:00 PM.

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Table 4.10-13  
Short-term (15 minute) Ambient Noise Measurements (Nighttime)

Site	Approximate Address	Existing Land Use	Monitored Date	15-minute dBA	Noise Exposure Compatibility Category
<b>Market Street Segment</b>					
J	201 Market Street	Commercial/Mixed Use	August 3, 2020	69.1	Clearly Compatible
K	205 Market Street	Public Residential	August 3, 2020	63.4	Clearly Compatible
A	300 Queen Street	Residential	August 3, 2020	57.8	Clearly Compatible
<b>Manchester Boulevard Segment</b>					
L	3500 Manchester Boulevard	Residential	August 4, 2020	72.8	Normally Incompatible
I	500 Manchester Boulevard	Residential	August 3, 2020	58.5	Clearly Compatible
B	712 Manchester Boulevard	Educational	August 4, 2020	70.5	Normally Incompatible
<b>Prairie Avenue Segment</b>					
G	629 Arbor Vitae Street	Residential	August 5, 2020	61.5	Normally Compatible
H	728 Kelso Street	Educational/Residential	August 4, 2020	56.6	Clearly Compatible
M	3681 Chapman Lane	Residential	August 4, 2020	67.9	Normally Compatible
F	636 Hardy Street	Residential	August 5, 2020	59.9	Clearly Compatible
C	823 Prairie Avenue	Place of Worship/Lodging	August 5, 2020	70.6	Normally Incompatible
D	10023 Prairie Avenue	Lodging	August 5, 2020	67.0	Normally Compatible
E	4020 Century Boulevard	Lodging	August 5, 2020	66.2	Normally Compatible

Source: Refer to Appendix M.1-3: Short-term (15-minute) Ambient Noise Measurements (Nighttime) for monitoring data sheets.  
 Note: Nighttime measurements took place between 8:00 PM to 9:45 PM.

Table 4.10-15  
Phase 1 Proposed Project Construction Noise Levels

Receptor	Existing Land Use	Time Period	dBA			Significance Threshold	Increase Over Significance Threshold	Significant Impact?
			Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>			
<b>Market Street Segment</b>								
Site 1	Residential	Daytime	61.9	77.6	77.7	90.0	--	No
		Nighttime	54.6	74.2	74.2	80.0	--	No
Site 2	Residential	Daytime	67.5	69.1	71.4	90.0	--	No
		Nighttime	64.1	66.1	68.2	80.0	--	No
Site A	Commercial	Daytime	64.1	60.9	65.8	100.0	--	No
		Nighttime	57.8	57.9	60.9	100.0	--	No
Site K	Residential	Daytime	<u>67.5</u>	<u>73.1</u>	<u>74.2</u>	<u>90.0</u>	<u>==</u>	<u>No</u>
		Nighttime	<u>63.4</u>	<u>70.1</u>	<u>70.9</u>	<u>80.0</u>	<u>==</u>	<u>No</u>
<b>Manchester Boulevard Segment</b>								
Site 2	Residential	Daytime	67.5	69.1	71.4	90.0	--	No
		Nighttime	64.1	66.1	68.2	80.0	--	No
Site B	Residential	Daytime	73.5	63.9	74.0	90.0	--	No
		Nighttime	70.5	60.9	71.0	80.0	--	No
Site I	Residential	Daytime	68.0	77.6	78.1	90.0	--	No
		Nighttime	58.5	74.6	74.7	80.0	--	No
Site J	Commercial/Mixed Use	Daytime	73.6	67.7	74.6	90.0	--	No
		Nighttime	69.1	64.7	70.4	80.0	--	No

Receptor	Existing Land Use	Time Period	dBA			Significance Threshold	Increase Over Significance Threshold	Significant Impact?
			Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>			
Site L	Residential	Daytime	74.0	56.5	74.1	90.0	--	No
		Nighttime	72.8	53.5	72.9	80.0	--	No
<b>Prairie Avenue Segment</b>								
Site 3	Education/Residential	Daytime	71.2	74.3	76.0	100.0	--	No
		Nighttime	66.0	71.3	72.4	100.0	--	No
Site 4	Residential	Daytime	77.2	61.0	77.3	90.0	--	No
		Nighttime	71.6	58.0	71.8	80.0	--	No
Site 5	Lodging	Daytime	73.3	59.5	73.7	100.0	--	No
		Nighttime	70.0	56.5	70.2	100.0	--	No
Site C	Place of worship/Lodging	Daytime	76.7	56.6	76.7	100.0	--	No
		Nighttime	70.6	53.5	70.7	100.0	--	No
Site D	Lodging	Daytime	76.2	59.6	76.3	100.0	--	No
		Nighttime	67.0	56.6	67.4	100.0	--	No
Site E	Lodging	Daytime	72.6	58.1	72.8	100.0	--	No
		Nighttime	66.2	55.1	66.5	100.0	--	No
Site F	Residential	Daytime	68.8	66.2	70.7	90.0	--	No
		Nighttime	59.9	63.2	64.9	80.0	--	No
Site G	Residential	Daytime	67.3	60.6	68.1	90.0	--	No
		Nighttime	61.5	57.6	63.0	80.0	--	No
Site H	Education/Residential	Daytime	67.6	61.7	68.6	90.0	--	No
		Nighttime	56.6	58.7	60.8	80.0	--	No

Receptor	Existing Land Use	Time Period		Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup> dBA	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
		Ambient Noise Levels	Construction Noise (Max Leq, 1hr)					
Site K	Public	Daytime	72.1	74.2	49.0	-	No	
		Nighttime	70.1	70.9	49.0	-	No	
Site M	Residential	Daytime	55.0	74.9	90.0	--	No	
		Nighttime	52.0	68.0	80.0	--	No	

Source: SoundPLAN (version 8.2). Refer to Appendix N.4.2 for construction noise (Phase J) worksheets.

Note: <sup>1</sup> Logarithmic increase = Ambient Noise + Modeled Construction Level.

Table 4.10-16  
Phase 2 Proposed Project Construction Noise Levels

Receptor	Existing Land Use	Time Period		Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup> dBA	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
		Ambient Noise Levels	Construction Noise (Max Leq, 1hr)					
<b>Market Street Segment</b>								
Site 1	Residential	Daytime	61.9	51.9	62.3	90.0	--	No
		Nighttime	54.6	48.8	55.6	80.0	--	No
Site 2	Residential	Daytime	67.5	67.7	70.6	90.0	--	No
		Nighttime	64.1	64.7	67.4	80.0	--	No
Site A	Commercial	Daytime	64.1	53.2	64.4	100.0	--	No
		Nighttime	57.8	50.2	58.5	100.0	--	No
Site K	Residential	Daytime	67.5	51.1	67.6	90.0	--	No
		Nighttime	63.4	48.1	63.5	80.0	--	No
<b>Manchester Boulevard Segment</b>								
Site 2	Residential	Daytime	67.5	67.7	70.6	90.0	--	No
		Nighttime	64.1	64.7	67.4	80.0	--	No
Site B	Residential	Daytime	73.5	64.9	74.0	90.0	--	No
		Nighttime	70.5	61.9	71.1	80.0	--	No
Site I	Residential	Daytime	68.0	75.8	76.5	90.0	--	No
		Nighttime	58.5	72.8	73.0	80.0	--	No
Site J	Commercial/Mixed Use	Daytime	73.6	55.1	73.7	90.0	--	No
		Nighttime	69.1	52.1	69.2	80.0	--	No
Site L	Residential	Daytime	74.0	53.7	74.0	90.0	--	No
		Nighttime	72.8	50.7	72.8	80.0	--	No
<b>Prairie Avenue Segment</b>								

Receptor	Existing Land Use	Time Period		Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
		Daytime	Nighttime						
Site 3	Education/Residential	Daytime	71.2	71.3	74.2	100.0	--	No	
		Nighttime	66.0	68.3	70.3	100.0	--	No	
Site 4	Residential	Daytime	77.2	72.7	78.5	90.0	--	No	
		Nighttime	71.6	69.7	73.8	80.0	--	No	
Site 5	Lodging	Daytime	73.3	54.9	73.4	100.0	--	No	
		Nighttime	70.0	51.9	70.1	100.0	--	No	
Site C	Place of worship/Lodging	Daytime	76.7	72.6	78.1	100.0	--	No	
		Nighttime	70.6	69.6	73.1	100.0	--	No	
Site D	Lodging	Daytime	76.2	56.0	76.2	100.0	--	No	
		Nighttime	67.0	53.0	67.2	100.0	--	No	
Site E	Lodging	Daytime	72.6	54.7	72.7	100.0	--	No	
		Nighttime	66.2	51.6	66.3	100.0	--	No	
Site F	Residential	Daytime	68.8	65.2	70.4	90.0	--	No	
		Nighttime	59.9	62.2	64.2	80.0	--	No	
Site G	Residential	Daytime	67.3	65.5	69.5	90.0	--	No	
		Nighttime	61.5	62.5	65.0	80.0	--	No	
Site H	Education/Residential	Daytime	67.6	66.7	70.2	90.0	--	No	
		Nighttime	56.6	63.8	64.6	80.0	--	No	
Site K	Public	Daytime	<del>67.5</del>	<del>51.1</del>	<del>67.6</del>	<del>100.0</del>	--	No	
		Nighttime	<del>63.4</del>	<del>48.1</del>	<del>63.5</del>	<del>100.0</del>	--	No	
Site M	Residential	Daytime	74.9	53.2	74.9	90.0	--	No	
		Nighttime	67.9	50.2	68.0	80.0	--	No	

Source: SoundPLAN (version 8.2). Refer to Appendix N.4-3 for construction noise (Phase 2) worksheets.  
 Note: <sup>1</sup> Logarithmic increase = Ambient Noise + Modeled Construction Level.

Table 4.10-17  
 Phase 3 Proposed Project Construction Noise Levels

Receptor	Existing Land Use	Time Period		Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
		Daytime	Nighttime						
<b>Market Street Segment</b>									
Site 1	Residential	Daytime	61.9	69.9	70.5	90.0	--	No	
		Nighttime	54.6	66.9	67.1	80.0	--	No	
Site 2	Residential	Daytime	67.5	74.1	75.0	90.0	--	No	
		Nighttime	64.1	71.1	71.9	80.0	--	No	
Site A	Commercial	Daytime	64.1	72.4	73.0	100.0	--	No	
		Nighttime	57.8	69.4	69.7	100.0	--	No	
Site K	Residential	Daytime	<del>67.5</del>	<del>71.3</del>	<del>72.8</del>	<del>90.0</del>	--	No	
		Nighttime	<del>63.4</del>	<del>68.3</del>	<del>69.5</del>	<del>80.0</del>	--	No	
<b>Manchester Boulevard Segment</b>									
Site 2	Residential	Daytime	67.5	74.1	75.0	90.0	--	No	
		Nighttime	64.1	71.1	71.9	80.0	--	No	
Site B	Residential	Daytime	73.5	73.2	76.4	90.0	--	No	
		Nighttime	70.5	70.2	73.4	80.0	--	No	
Site I	Residential	Daytime	68.0	77.1	77.6	90.0	--	No	
		Nighttime	58.5	74.1	74.2	80.0	--	No	
Site J	Commercial/Mixed Use	Daytime	73.6	70.5	75.3	90.0	--	No	
		Nighttime	69.1	67.5	71.4	80.0	--	No	
Site L	Residential	Daytime	74.0	55.2	74.1	90.0	--	No	
		Nighttime	72.8	52.2	72.8	80.0	--	No	
<b>Prairie Avenue Segment</b>									

Receptor	Existing Land Use	Time Period		Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
		Daytime	Nighttime						
Site 3	Education/Residential	Daytime	69.1	73.3	100.0	--	No		
		Nighttime	66.1	69.1	100.0	--	No		
Site 4	Residential	Daytime	53.6	77.2	90.0	--	No		
		Nighttime	50.6	71.6	80.0	--	No		
Site 5	Lodging	Daytime	52.2	73.3	100.0	--	No		
		Nighttime	49.2	70.0	100.0	--	No		
Site C	Place of worship/Lodging	Daytime	53.1	76.7	100.0	--	No		
		Nighttime	50.1	70.6	100.0	--	No		
Site D	Lodging	Daytime	52.7	76.2	100.0	--	No		
		Nighttime	49.7	67.1	100.0	--	No		
Site E	Lodging	Daytime	50.1	72.6	100.0	--	No		
		Nighttime	47.1	66.3	100.0	--	No		
Site F	Residential	Daytime	57.1	69.1	90.0	--	No		
		Nighttime	54.1	60.9	80.0	--	No		
Site G	Residential	Daytime	56.9	67.7	90.0	--	No		
		Nighttime	53.9	62.2	80.0	--	No		
Site H	Education/Residential	Daytime	61.8	68.6	90.0	--	No		
		Nighttime	58.8	60.8	80.0	--	No		
<del>Site K</del>	<del>Public</del>	<del>Daytime</del>	<del>71.3</del>	<del>72.8</del>	<del>100.0</del>	<del>--</del>	<del>No</del>		
		<del>Nighttime</del>	<del>68.2</del>	<del>69.5</del>	<del>100.0</del>	<del>--</del>	<del>No</del>		
Site M	Residential	Daytime	52.5	74.9	90.0	--	No		
		Nighttime	49.5	68.0	80.0	--	No		

Source: SoundPLAN (version 8.2). Refer to Appendix N.4.4 for construction noise (Phase 3) worksheets.  
 Note: <sup>1</sup> Logarithmic increase = Ambient Noise + Modeled Construction Level.

Receptor	Existing Land Use	Time Period		Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
		Daytime	Nighttime						
Site 1	Residential	Daytime	70.5	71.0	90.0	--	No		
		Nighttime	67.5	67.7	80.0	--	No		
Site 2	Residential	Daytime	74.9	75.6	90.0	--	No		
		Nighttime	71.9	72.6	80.0	--	No		
Site A	Commercial	Daytime	73.0	73.5	100.0	--	No		
		Nighttime	70.0	70.3	100.0	--	No		
<del>Site K</del>	<del>Residential</del>	<del>Daytime</del>	<del>71.9</del>	<del>73.2</del>	<del>90.0</del>	<del>--</del>	<del>No</del>		
		<del>Nighttime</del>	<del>68.9</del>	<del>70.0</del>	<del>80.0</del>	<del>--</del>	<del>No</del>		

Table 4.10-18  
 Phase 4 Proposed Project Construction Noise Levels

Receptor	Existing Land Use	Time Period		Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
		Daytime	Nighttime						
<b>Market Street Segment</b>									
Site 1	Residential	Daytime	70.5	71.0	90.0	--	No		
		Nighttime	67.5	67.7	80.0	--	No		
Site 2	Residential	Daytime	74.9	75.6	90.0	--	No		
		Nighttime	71.9	72.6	80.0	--	No		
Site A	Commercial	Daytime	73.0	73.5	100.0	--	No		
		Nighttime	70.0	70.3	100.0	--	No		
<del>Site K</del>	<del>Residential</del>	<del>Daytime</del>	<del>71.9</del>	<del>73.2</del>	<del>90.0</del>	<del>--</del>	<del>No</del>		
		<del>Nighttime</del>	<del>68.9</del>	<del>70.0</del>	<del>80.0</del>	<del>--</del>	<del>No</del>		
<b>Manchester Boulevard Segment</b>									
Site 2	Residential	Daytime	74.9	75.6	90.0	--	No		
		Nighttime	71.9	72.6	80.0	--	No		
Site B	Residential	Daytime	74.4	77.0	90.0	--	No		
		Nighttime	71.4	74.0	80.0	--	No		
Site I	Residential	Daytime	77.8	78.2	90.0	--	No		
		Nighttime	74.8	74.9	80.0	--	No		

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Receptor	Existing Land Use	Time Period		Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
		Daytime	Nighttime						
Site J	Commercial/Mixed Use	Daytime	71.2	73.6	71.2	75.6	90.0	--	No
		Nighttime	68.2	69.1	71.7	80.0	--	No	
Site L	Residential	Daytime	57.1	74.0	74.1	90.0	--	No	
		Nighttime	54.1	72.8	72.9	80.0	--	No	
<b>Prairie Avenue Segment</b>									
Site 3	Education/Residential	Daytime	73.8	71.2	73.8	75.7	100.0	--	No
		Nighttime	70.8	66.0	72.0	100.0	--	No	
Site 4	Residential	Daytime	74.3	77.2	79.0	90.0	--	No	
		Nighttime	71.3	71.6	74.5	80.0	--	No	
Site 5	Lodging	Daytime	57.0	73.3	73.4	100.0	--	No	
		Nighttime	54.0	70.0	70.1	100.0	--	No	
Site C	Place of worship/Lodging	Daytime	74.2	76.7	78.6	100.0	--	No	
		Nighttime	71.2	70.6	73.9	100.0	--	No	
Site D	Lodging	Daytime	58.0	76.2	76.3	100.0	--	No	
		Nighttime	55.0	67.0	67.3	100.0	--	No	
Site E	Lodging	Daytime	56.8	72.6	72.7	100.0	--	No	
		Nighttime	53.7	66.2	66.4	100.0	--	No	
Site F	Residential	Daytime	66.9	68.8	71.0	90.0	--	No	
		Nighttime	63.9	59.9	65.4	80.0	--	No	
Site G	Residential	Daytime	67.3	67.3	70.3	90.0	--	No	
		Nighttime	64.3	61.5	66.1	80.0	--	No	
Site H	Education/Residential	Daytime	69.0	67.6	71.4	90.0	--	No	
		Nighttime	66.0	56.6	66.5	80.0	--	No	
<b>Site K</b>	<b>Public</b>	<b>Daytime</b>	<b>71.9</b>	<b>67.5</b>	<b>73.2</b>	<b>100.0</b>	<b>--</b>	<b>No</b>	

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Receptor	Existing Land Use	Time Period		Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
		Daytime	Nighttime						
Site M	Residential	Daytime	56.2	74.9	75.0	90.0	--	No	
		Nighttime	53.2	67.9	68.0	80.0	--	No	

Source: SoundPLAN (version 8.2). Refer to Appendix N.4-5 for construction noise (Phase 4) worksheets.  
Note: <sup>1</sup> Logarithmic Increase = Ambient Noise + Modeled Construction Level.

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**Table 4.10-19  
Phase 5 Proposed Project Construction Noise Levels**

Receptor	Existing Land Use	Ambient Noise Levels		Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
		Time Period	dB(A)					
<b>Market Street Segment</b>								
Site 1	Residential	Daytime	61.9	70.7	71.2	90.0	--	No
		Nighttime	54.6	67.7	67.9	80.0	--	No
Site 2	Residential	Daytime	67.5	74.5	75.3	90.0	--	No
		Nighttime	64.1	71.4	72.1	80.0	--	No
Site A	Commercial	Daytime	64.1	73.2	73.7	100.0	--	No
		Nighttime	57.8	70.2	70.4	100.0	--	No
Site K	Residential	Daytime	67.5	72.1	73.4	90.0	=	No
		Nighttime	63.4	69.1	70.1	80.0	=	No
<b>Manchester Boulevard Segment</b>								
Site 2	Residential	Daytime	67.5	74.5	75.3	90.0	--	No
		Nighttime	64.1	71.4	72.1	80.0	--	No
Site B	Residential	Daytime	73.5	74.6	77.1	90.0	--	No
		Nighttime	70.5	71.6	74.1	80.0	--	No
Site I	Residential	Daytime	68.0	71.0	72.8	90.0	--	No
		Nighttime	58.5	68.0	68.5	80.0	--	No
Site J	Commercial/Mixed Use	Daytime	73.6	71.3	75.6	90.0	--	No
		Nighttime	69.1	68.3	71.7	80.0	--	No
Site L	Residential	Daytime	74.0	55.8	74.1	90.0	--	No
		Nighttime	72.8	52.8	72.8	80.0	--	No
<b>Prairie Avenue Segment</b>								

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Receptor	Existing Land Use	Ambient Noise Levels		Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
		Time Period	dB(A)					
Site 3	Education/Residential	Daytime	71.2	73.9	75.8	100.0	--	No
		Nighttime	66.0	70.9	72.1	100.0	--	No
Site 4	Residential	Daytime	77.2	74.5	79.1	90.0	--	No
		Nighttime	71.6	71.5	74.6	80.0	--	No
Site 5	Lodging	Daytime	73.3	56.7	73.4	100.0	--	No
		Nighttime	70.0	53.7	70.1	100.0	--	No
Site C	Place of worship/Lodging	Daytime	76.7	74.4	78.7	100.0	--	No
		Nighttime	70.6	71.4	74.0	100.0	--	No
Site D	Lodging	Daytime	76.2	57.7	76.3	100.0	--	No
		Nighttime	67.0	54.7	67.2	100.0	--	No
Site E	Lodging	Daytime	72.6	56.9	72.7	100.0	--	No
		Nighttime	66.2	53.9	66.4	100.0	--	No
Site F	Residential	Daytime	68.8	67.1	71.0	90.0	--	No
		Nighttime	59.9	64.0	65.4	80.0	--	No
Site G	Residential	Daytime	67.3	67.3	70.3	90.0	--	No
		Nighttime	61.5	64.3	66.1	80.0	--	No
Site H	Education/Residential	Daytime	67.6	68.9	71.3	90.0	--	No
		Nighttime	56.6	65.9	66.4	80.0	--	No
Site K	Public	Daytime	67.5	72.1	73.4	100.0	--	No
		Nighttime	63.4	68.1	70.1	100.0	--	No
Site M	Residential	Daytime	74.9	56.0	75.0	90.0	--	No
		Nighttime	67.9	53.0	68.0	80.0	--	No

Source: SoundPLAN (version 8.2). Refer to Appendix N.4-6 for construction noise (Phase 5) worksheets.  
Note: <sup>1</sup> Logarithmic increase = Ambient Noise + Modeled Construction Level.

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Receptor	Existing Land Use	Time Period	Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold
			dB(A)				

Table 4.10-20  
Phase 6 Proposed Project Construction Noise Levels

Receptor	Existing Land Use	Time Period	Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold
			dB(A)				
<b>Market Street Segment</b>							
Site 1	Residential	Daytime	61.9	66.7	67.9	90.0	--
		Nighttime	54.6	63.7	64.2	80.0	--
Site 2	Residential	Daytime	67.5	72.8	73.9	90.0	--
		Nighttime	64.1	69.8	70.8	80.0	--
Site A	Commercial	Daytime	64.1	59.4	65.4	100.0	--
		Nighttime	57.8	56.4	60.2	100.0	--
<u>Site K</u>	<u>Residential</u>	<u>Daytime</u>	<u>67.5</u>	<u>62.2</u>	<u>68.6</u>	<u>90.0</u>	<u>==</u>
		<u>Nighttime</u>	<u>63.4</u>	<u>59.2</u>	<u>64.8</u>	<u>80.0</u>	<u>==</u>
<b>Manchester Boulevard Segment</b>							
Site 2	Residential	Daytime	67.5	72.8	73.9	90.0	--
		Nighttime	64.1	69.8	70.8	80.0	--
Site B	Residential	Daytime	73.5	72.7	76.1	90.0	--
		Nighttime	70.5	69.7	73.1	80.0	--
Site I	Residential	Daytime	68.0	75.0	75.8	90.0	--
		Nighttime	58.5	72.0	72.2	80.0	--

Receptor	Existing Land Use	Time Period	Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold
			dB(A)				
Site J	Commercial/Mixed Use	Daytime	73.6	65.4	74.2	90.0	--
		Nighttime	69.1	62.4	69.9	80.0	--
Site L	Residential	Daytime	74.0	54.1	74.0	90.0	--
		Nighttime	72.8	51.1	72.8	80.0	--
<b>Prairie Avenue Segment</b>							
Site 3	Education/Residential	Daytime	71.2	72.0	74.6	100.0	--
		Nighttime	66.0	69.0	70.8	100.0	--
Site 4	Residential	Daytime	77.2	72.6	78.5	90.0	--
		Nighttime	71.6	69.6	73.7	80.0	--
Site 5	Lodging	Daytime	73.3	54.8	73.4	100.0	--
		Nighttime	70.0	51.8	70.1	100.0	--
Site C	Place of worship/Lodging	Daytime	76.7	72.5	78.1	100.0	--
		Nighttime	70.6	69.5	73.1	100.0	--
Site D	Lodging	Daytime	76.2	55.9	76.2	100.0	--
		Nighttime	67.0	52.9	67.2	100.0	--
Site E	Lodging	Daytime	72.6	54.9	72.7	100.0	--
		Nighttime	66.2	51.9	66.4	100.0	--
Site F	Residential	Daytime	68.8	65.2	70.4	90.0	--
		Nighttime	59.9	62.2	64.2	80.0	--
Site G	Residential	Daytime	67.3	65.5	69.5	90.0	--
		Nighttime	61.5	62.4	65.0	80.0	--
Site H	Education/Residential	Daytime	67.6	67.0	70.3	90.0	--
		Nighttime	56.6	64.0	64.7	80.0	--
<u>Site K</u>	<u>Public</u>	<u>Daytime</u>	<u>67.5</u>	<u>62.2</u>	<u>68.6</u>	<u>100.0</u>	<u>==</u>

Receptor	Existing Land Use	Ambient Noise Levels		Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup> dBA	Significance Threshold	Increase Over Significance Threshold
		Time Period	Time Period				
Site M	Residential	Nighttime	<del>62.4</del>	<del>56.2</del>	<del>64.8</del>	<del>100.0</del>	--
		Daytime	74.9	54.0	74.9	90.0	--
		Nighttime	67.9	51.0	68.0	80.0	--

Sources: SoundPLAN (version 8.2). Refer to Appendix N4-7 for construction noise (Phase 6) worksheets.  
 Note: <sup>1</sup> Logarithmic increase = Ambient Noise + Modeled Construction Level.

Table 4.10-21  
 Phase 7 Proposed Project Construction Noise Levels

Receptor	Existing Land Use	Ambient Noise Levels		Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup> dBA	Significance Threshold	Increase Over Significance Threshold	
		Time Period	Time Period					
<b>Market Street Segment</b>								
Site 1	Residential	Daytime	61.9	70.3	70.9	90.0	--	No
		Nighttime	54.6	67.3	67.5	80.0	--	No
Site 2	Residential	Daytime	67.5	66.5	70.0	90.0	--	No
		Nighttime	64.1	63.4	66.8	80.0	--	No
Site A	Commercial	Daytime	64.1	57.0	64.9	100.0	--	No
		Nighttime	57.8	54.0	59.3	100.0	--	No
Site K	Residential	Daytime	<del>67.5</del>	<del>70.2</del>	<del>72.1</del>	<del>90.0</del>	<del>==</del>	<del>No</del>
		Nighttime	<del>63.4</del>	<del>67.2</del>	<del>68.7</del>	<del>80.0</del>	<del>==</del>	<del>No</del>
<b>Manchester Boulevard Segment</b>								

Receptor	Existing Land Use	Ambient Noise Levels		Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup> dBA	Significance Threshold	Increase Over Significance Threshold	
		Time Period	Time Period					
Site 2	Residential	Daytime	67.5	66.5	70.0	90.0	--	No
		Nighttime	64.1	63.4	66.8	80.0	--	No
Site B	Residential	Daytime	73.5	61.9	73.8	90.0	--	No
		Nighttime	70.5	58.9	70.8	80.0	--	No
Site I	Residential	Daytime	68.0	75.6	76.3	90.0	--	No
		Nighttime	58.5	72.6	72.8	80.0	--	No
Site J	Commercial/Mixed Use	Daytime	73.6	66.8	74.4	90.0	--	No
		Nighttime	69.1	63.8	70.2	80.0	--	No
Site L	Residential	Daytime	74.0	53.0	74.0	90.0	--	No
		Nighttime	72.8	49.9	72.8	80.0	--	No
<b>Prairie Avenue Segment</b>								
Site 3	Education/Residential	Daytime	71.2	73.5	75.5	100.0	--	No
		Nighttime	66.0	70.5	71.8	100.0	--	No
Site 4	Residential	Daytime	77.2	55.0	77.2	90.0	--	No
		Nighttime	71.6	52.0	71.6	80.0	--	No
Site 5	Lodging	Daytime	73.3	54.1	73.4	100.0	--	No
		Nighttime	70.0	51.1	70.1	100.0	--	No
Site C	Place of worship/Lodging	Daytime	76.7	51.9	76.7	100.0	--	No
		Nighttime	70.6	48.9	70.6	100.0	--	No
Site D	Lodging	Daytime	76.2	55.2	76.2	100.0	--	No
		Nighttime	67.0	52.2	67.1	100.0	--	No
Site E	Lodging	Daytime	72.6	53.6	72.7	100.0	--	No
		Nighttime	66.2	50.6	66.3	100.0	--	No
Site F	Residential	Daytime	68.8	62.2	69.7	90.0	--	No

Receptor	Existing Land Use	Ambient Noise Levels		Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
		Time Period	Time Period					
Site G	Residential	Nighttime	59.9	59.2	62.6	80.0	--	No
		Daytime	67.3	55.3	67.6	90.0	--	No
		Nighttime	61.5	52.3	62.0	80.0	--	No
Site H	Education/Residential	Daytime	67.6	58.7	68.1	90.0	--	No
		Nighttime	56.6	55.6	59.1	80.0	--	No
		Daytime	<del>67.5</del>	<del>70.2</del>	<del>72.1</del>	<del>100.0</del>	--	<del>No</del>
<del>Site K</del>	<del>Public</del>	Nighttime	<del>62.4</del>	<del>67.2</del>	<del>68.7</del>	<del>100.0</del>	--	<del>No</del>
		Daytime	74.9	51.3	74.9	90.0	--	No
Site M	Residential	Daytime	67.9	48.3	67.9	80.0	--	No

Source: SoundPLAN (version 8.2). Refer to Appendix N4-8 for construction noise (Phase 7) worksheets.

Note: <sup>1</sup> Logarithmic Increase = Ambient Noise + Modeled Construction Level.

Table 4.10-22  
Phase 8 Proposed Project Construction Noise Levels

Receptor	Existing Land Use	Ambient Noise Levels		Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
		Time Period	Time Period					
<b>Market Street Segment</b>								
Site 1	Residential	Daytime	61.9	75.8	76.0	90.0	--	No
		Nighttime	54.6	72.8	72.9	80.0	--	No
Site 2	Residential	Daytime	67.5	79.6	79.9	90.0	--	No
		Nighttime	64.1	76.5	76.7	80.0	--	No

Receptor	Existing Land Use	Ambient Noise Levels		Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
		Time Period	Time Period					
Site A	Commercial	Daytime	64.1	78.3	78.5	100.0	--	No
		Nighttime	57.8	75.3	75.4	100.0	--	No
<del>Site K</del>	<del>Residential</del>	Daytime	<del>67.5</del>	<del>77.2</del>	<del>77.6</del>	<del>90.0</del>	--	<del>No</del>
		Nighttime	<del>63.4</del>	<del>74.2</del>	<del>74.5</del>	<del>80.0</del>	--	<del>No</del>
<b>Manchester Boulevard Segment</b>								
Site 2	Residential	Daytime	67.5	79.6	79.9	90.0	--	No
		Nighttime	64.1	76.5	76.7	80.0	--	No
Site B	Residential	Daytime	73.5	79.7	80.6	90.0	--	No
		Nighttime	70.5	76.7	77.6	80.0	--	No
Site I	Residential	Daytime	68.0	76.1	76.7	90.0	--	No
		Nighttime	58.5	73.1	73.2	80.0	--	No
Site J	Commercial/Mixed Use	Daytime	73.6	76.4	78.2	90.0	--	No
		Nighttime	69.1	73.4	74.8	80.0	--	No
Site L	Residential	Daytime	74.0	60.9	74.2	90.0	--	No
		Nighttime	72.8	57.9	72.9	80.0	--	No
<b>Prairie Avenue Segment</b>								
Site 3	Education/Residential	Daytime	71.2	79.0	79.7	100.0	--	No
		Nighttime	66.0	76.0	76.4	100.0	--	No
Site 4	Residential	Daytime	77.2	79.6	81.6	90.0	--	No
		Nighttime	71.6	76.6	77.8	80.0	--	No
Site 5	Lodging	Daytime	73.3	61.8	73.6	100.0	--	No
		Nighttime	70.0	58.8	70.3	100.0	--	No
Site C	Place of worship/Lodging	Daytime	76.7	79.5	81.3	100.0	--	No
		Nighttime	70.6	76.5	77.5	100.0	--	No

Receptor	Existing Land Use	Time Period		Ambient Noise Levels	Construction Noise (Max Leq, 1hr)	Ambient plus Construction Noise <sup>1</sup>	Significance Threshold	Increase Over Significance Threshold	Significant Impact?
		Daytime	Nighttime						
Site D	Lodging	Daytime	62.8	76.2	62.8	76.4	100.0	--	No
		Nighttime	59.8	67.0	59.8	67.8	100.0	--	No
Site E	Lodging	Daytime	62.0	72.6	62.0	73.0	100.0	--	No
		Nighttime	59.0	66.2	59.0	67.0	100.0	--	No
Site F	Residential	Daytime	72.2	68.8	72.2	73.8	90.0	--	No
		Nighttime	69.1	59.9	69.1	69.6	80.0	--	No
Site G	Residential	Daytime	72.4	67.3	72.4	73.6	90.0	--	No
		Nighttime	69.4	61.5	69.4	70.0	80.0	--	No
Site H	Education/Residential	Daytime	74.0	67.6	74.0	74.9	90.0	--	No
		Nighttime	71.0	56.6	71.0	71.2	80.0	--	No
<del>Site K</del>	<del>Public</del>	<del>Daytime</del>	<del>72.2</del>	<del>67.5</del>	<del>72.2</del>	<del>72.6</del>	<del>100.0</del>	<del>--</del>	<del>No</del>
		<del>Nighttime</del>	<del>74.2</del>	<del>63.4</del>	<del>74.2</del>	<del>74.5</del>	<del>100.0</del>	<del>--</del>	<del>No</del>
Site M	Residential	Daytime	61.1	74.9	61.1	75.1	90.0	--	No
		Nighttime	58.1	67.9	58.1	68.3	80.0	--	No

Source: SoundPLAN (version 8.2). Refer to **Appendix N.4-9** for construction noise (Phase 8) worksheets.  
 Note: <sup>1</sup> Logarithmic increase = Ambient Noise + Modeled Construction Level.

Table 4.10-23  
ATS Trains Exterior Noise Levels

Site ID	Land Use	Train Type	Existing Ambient Noise Levels		Modeled Guideway Noise Levels		Future Ambient Plus Proposed ATS Trains		Increase in Noise		Significant Impact?
			Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime	
<b>Market Street Segment</b>											
Site I	Residential	Rubber Tired	61.9	54.6	48.9	48.1	62.1	55.5	+0.2	+0.9	No
		Monorail	52.7	51.8	51.8	56.4	56.4	56.4	+0.5	+1.8	No
Site A	Residential	Rubber Tired	64.1	57.8	37.6	36.7	64.1	57.8	0.0	0.0	No
		Monorail	48.7	47.9	47.9	58.2	58.2	58.2	+0.1	+0.4	No
Site K	Public Residential	Rubber Tired	67.5	63.4	49.3	48.5	67.6	63.5	+0.1	+0.1	No
		Monorail	54.8	54.0	54.0	67.7	63.9	63.9	+0.2	+0.5	No
<b>Manchester Boulevard Segment</b>											
Site Z	Residential	Rubber Tired	64.1	59.4	37.6	36.7	64.1	59.4	0.0	0.0	No
		Monorail	47.6	46.8	46.8	59.6	59.6	59.6	+0.1	+0.2	No
Site B	Educational	Rubber Tired	73.5	70.5	38.6	37.7	73.5	70.5	0.0	0.0	No
		Monorail	48.0	47.1	47.1	70.5	70.5	70.5	0.0	0.0	No
Site I	Residential	Rubber Tired	68.0	58.5	38.6	37.7	68.0	58.5	0.0	0.0	No
		Monorail	45.9	45.0	45.0	58.7	58.7	58.7	0.0	+0.2	No
Site J	Commercial/Mixed Use	Rubber Tired	73.6	69.1	34.0	33.1	73.6	69.1	0.0	0.0	No
		Monorail	47.2	46.3	46.3	69.1	69.1	69.1	0.0	0.0	No
Site L	Residential	Rubber Tired	74.0	72.8	33.9	33.1	74.0	72.8	0.0	0.0	No
		Monorail	40.1	39.3	39.3	72.8	72.8	72.8	0.0	0.0	No

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Site ID	Land Use	Existing Ambient		Modeled Guideway Noise Levels		Future Ambient Plus Proposed ATS Trains		Increase in Noise		Significant Impact?	
		Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime		
		dBA		dBA		dBA					
<b>Prairie Avenue Segment</b>											
Site 3	Educational/Residential	71.2	66.0	Rubber Tired	40.4	39.6	71.2	66.0	0.0	0.0	No
				Monorail	48.6	47.7	71.2	66.1	0.0	+0.1	No
Site 4	Residential	77.2	71.6	Rubber Tired	35.1	34.1	77.2	71.6	0.0	0.0	No
				Monorail	46.0	45.1	77.2	71.6	0.0	0.0	No
Site C	Place of Worship/Lodging	76.7	70.6	Rubber Tired	35.0	34.1	76.7	70.6	0.0	0.0	No
				Monorail	46.3	45.4	76.7	70.6	0.0	0.0	No
Site E	Lodging	72.6	66.2	Rubber Tired	27.5	26.6	72.6	66.2	0.0	0.0	No
				Monorail	39.6	38.7	72.6	66.2	0.0	0.0	No
Site F	Residential	68.8	59.9	Rubber Tired	37.8	37.0	68.8	59.9	0.0	0.0	No
				Monorail	46.3	45.4	68.8	60.1	0.0	+0.2	No
Site G	Residential	67.3	61.5	Rubber Tired	40.9	40.0	67.3	61.5	0.0	0.0	No
				Monorail	47.9	47.1	67.3	61.7	0.0	+0.2	No
Site H	Educational/Residential	67.6	56.6	Rubber Tired	41.5	40.6	67.6	56.7	0.0	+0.1	No
				Monorail	48.1	47.2	67.6	57.0	0.0	+0.4	No
Site M	Residential	74.9	67.9	Rubber Tired	31.6	30.8	74.9	67.9	0.0	0.0	No
				Monorail	38.3	37.5	74.9	67.9	0.0	0.0	No
Site 5	Lodging	73.3	70.0	Rubber Tired	31.3	30.4	73.3	70.0	0.0	0.0	No
				Monorail	42.1	41.3	73.3	70.0	0.0	0.0	No
Site D	Lodging	76.2	67.0	Rubber Tired	30.9	30.0	76.2	67.0	0.0	0.0	No
				Monorail	39.0	38.2	76.2	67.0	0.0	0.0	No

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251-004-20

2.0-68

Inglewood Transit Connector Project  
February 2022

2.0 Revisions to the Draft EIR

Site ID	Land Use	Existing Ambient		Modeled Guideway Noise Levels		Future Ambient Plus Proposed ATS Trains		Increase in Noise		Significant Impact?
		Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime	
		dBA		dBA		dBA				

Source: Refer to Appendix N.6-2 for Operational Noise for Modeled Guideway System Worksheets.

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2.0-69

Inglewood Transit Connector Project  
February 2022

**Table 4.10-24  
Modeled Operational Noise Levels**

Receptor	Land Use	Time Period	Ambient Noise	MSF Operational Noise, Leq	MSF Operational Noise plus Ambient, leq	Increase Over Ambient, Leq	Significant Impact?
			dB(A)	dB(A)	dB(A)		
<b>Market Street Segment</b>							
Site 1	Residential	Daytime	61.9	39.1	61.9	0.0	No
		Nighttime	54.6	33.5	54.6	0.0	No
Site A	Residential	Daytime	64.1	40.9	64.1	0.0	No
		Nighttime	57.8	35.2	57.8	0.0	No
Site K	Public Residential	Daytime	67.5	38.3	67.5	0.0	No
		Nighttime	63.4	32.7	63.4	0.0	No
<b>Manchester Boulevard Segment</b>							
Site 2	Residential	Daytime	67.5	56.9	67.9	+0.4	No
		Nighttime	64.1	51.3	64.3	+0.2	No
Site B	Educational	Daytime	73.5	45.2	73.5	0.0	No
		Nighttime	70.5	39.5	70.5	0.0	No
Site I	Residential	Daytime	68.0	65.9	70.1	+2.1	No
		Nighttime	58.5	60.2	62.4	+3.9	No
Site J	Commercial/Mixed Use	Daytime	73.6	42.7	73.6	0.0	No
		Nighttime	69.1	37.1	69.1	0.0	No
Site L	Residential	Daytime	74.0	39.9	74.0	0.0	No
		Nighttime	72.8	34.2	72.8	0.0	No
<b>Prairie Avenue Segment</b>							
Site 3	Educational/Residential	Daytime	71.2	47.3	71.2	0.0	No
		Nighttime	66.0	41.6	66.0	0.0	No
Site 4	Residential	Daytime	77.2	32.3	77.2	0.0	No

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2.0-70

Inglewood Transit Connector Project  
February 2022

**2.0 Revisions to the Draft EIR**

Receptor	Land Use	Time Period	Ambient Noise	MSF Operational Noise, Leq	MSF Operational Noise plus Ambient, leq	Increase Over Ambient, Leq	Significant Impact?
			dB(A)	dB(A)	dB(A)		
Site C	Place of Worship/Lodging	Nighttime	71.6	26.6	71.6	0.0	No
		Daytime	76.7	34.3	76.7	0.0	No
		Nighttime	70.6	28.6	70.6	0.0	No
Site E	Lodging	Daytime	72.6	28.2	72.6	0.0	No
Site F	Residential	Nighttime	66.2	22.6	66.2	0.0	No
		Daytime	68.8	37.6	68.8	0.0	No
Site G	Residential	Nighttime	59.9	32.0	59.9	0.0	No
		Daytime	67.3	40.2	67.3	0.0	No
Site H	Educational/Residential	Nighttime	61.5	34.5	61.5	0.0	No
		Daytime	67.6	44.9	67.6	0.0	No
Site M	Residential	Nighttime	56.6	39.2	56.7	+0.1	No
		Daytime	74.9	36.4	74.9	0.0	No
Site D	Lodging	Nighttime	67.9	30.8	67.9	0.0	No
		Daytime	76.2	36.5	76.2	0.0	No
Site 5	Lodging	Nighttime	67.0	30.8	67.0	0.0	No
		Daytime	73.3	35.4	73.3	0.0	No
		Nighttime	70.0	29.7	70.0	0.0	No

Source: Refer to Appendix N-5.1 for MSF Stationary Source Worksheets.

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2.0-71

Inglewood Transit Connector Project  
February 2022

**Table 4.10-25  
Composite Operational Noise (Roadway, ATS Trains, and Stationary Sources)**

Sensitive Receptor ID	Land Use	Time Period	Future Long-Term (2045) Noise Levels <sup>1</sup>		Maximum Noise Levels at Roadway <sup>2</sup>	Maximum Stationary Noise Levels <sup>3</sup>	Future Roadway plus Maximum Noise at Stationary		Increase in Composite Noise <sup>4</sup>	Significant Impact?
			Daytime	Nighttime			Daytime	Nighttime		
<b>Market Street Segment</b>										
Site 1	Residential	Daytime	58.7	52.7	52.7	39.1	59.7	59.7	+1.0	No
		Nighttime	51.2	51.8	51.8	33.5	54.6	54.6	+3.8	No
Site A	Residential	Daytime	60.9	48.7	48.7	40.9	61.2	61.2	+0.3	No
		Nighttime	53.3	47.9	47.9	35.2	54.5	54.5	+1.2	No
Site K	<del>Public</del> Residential	Daytime	67.3	54.8	54.8	38.3	67.5	67.5	+0.2	No
		Nighttime	59.8	54.0	54.0	32.7	60.8	60.8	+1.0	No
<b>Manchester Boulevard Segment</b>										
Site 2	Residential	Daytime	70.2	47.6	47.6	56.9	70.4	70.4	+0.2	No
		Nighttime	62.7	46.8	46.8	51.3	63.1	63.1	+0.4	No
Site B	Educational	Daytime	70.2	48.0	48.0	45.2	70.2	70.2	0.0	No
		Nighttime	62.7	47.1	47.1	39.5	62.8	62.8	+0.1	No
Site I	Residential	Daytime	63.4	45.9	45.9	65.9	67.9	67.9	+4.5	No
		Nighttime	55.8	45.0	45.0	60.2	61.6	61.6	+5.8	No
Site J	Commercial/Mixed Use	Daytime	68.8	47.2	47.2	42.7	68.8	68.8	0.0	No
		Nighttime	61.3	46.3	46.3	37.1	61.5	61.5	+0.2	No
Site L	Residential	Daytime	73.0	40.1	40.1	39.9	73.0	73.0	0.0	No
		Nighttime	65.5	39.3	39.3	34.2	65.5	65.5	0.0	No
<b>Prairie Avenue Segment</b>										
Site 3	Educational/Residential	Daytime	71.9	48.6	48.6	47.3	72.0	72.0	+0.1	No

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2.0-72

Inglewood Transit Connector Project  
March 2022

Sensitive Receptor ID	Land Use	Time Period	Future Long-Term (2045) Noise Levels <sup>1</sup>		Maximum Noise Levels at Roadway <sup>2</sup>	Maximum Stationary Noise Levels <sup>3</sup>	Future Roadway plus Maximum Noise at Stationary		Increase in Composite Noise <sup>4</sup>	Significant Impact?
			Daytime	Nighttime			Daytime	Nighttime		
<b>Market Street Segment</b>										
Site 4	Residential	Daytime	64.3	47.7	47.7	41.6	64.4	64.4	+0.1	No
		Nighttime	71.7	46.0	46.0	32.3	71.7	71.7	0.0	No
Site C	Place of Worship/Lodging	Daytime	64.2	45.1	45.1	26.6	64.3	64.3	+0.1	No
		Nighttime	72.1	46.3	46.3	34.3	72.1	72.1	0.0	No
Site E	Lodging	Daytime	64.5	45.4	45.4	28.6	64.6	64.6	+0.1	No
		Nighttime	73.0	39.6	39.6	28.2	73.0	73.0	0.0	No
Site F	Residential	Daytime	65.5	38.7	38.7	22.6	65.5	65.5	0.0	No
		Nighttime	59.7	46.3	46.3	37.6	59.9	59.9	+0.2	No
Site G	Residential	Daytime	52.2	45.4	45.4	32.0	53.1	53.1	+0.9	No
		Nighttime	65.3	47.9	47.9	40.2	65.4	65.4	+0.1	No
Site H	Educational/Residential	Daytime	57.8	47.1	47.1	34.5	58.2	58.2	+0.4	No
		Nighttime	64.8	48.1	48.1	44.9	64.9	64.9	+0.1	No
Site M	Residential	Daytime	57.3	47.2	47.2	39.2	57.8	57.8	+0.5	No
		Nighttime	71.3	38.3	38.3	36.4	71.3	71.3	0.0	No
Site D	Lodging	Daytime	63.8	37.5	37.5	30.8	63.8	63.8	0.0	No
		Nighttime	72.1	39.0	39.0	36.5	72.1	72.1	0.0	No
Site 5	Lodging	Daytime	64.6	38.2	38.2	30.8	64.6	64.6	0.0	No
		Nighttime	73.6	42.1	42.1	35.4	73.6	73.6	0.0	No
Site 5	Lodging	Daytime	66.1	41.3	41.3	29.7	66.1	66.1	0.0	No
		Nighttime	73.6	42.1	42.1	35.4	73.6	73.6	0.0	No

<sup>1</sup> Refer to Table 4.10-20 for Roadway Noise Levels  
<sup>2</sup> Refer to Table 4.10-23 for Monorail Guideway-System operational noise levels.  
<sup>3</sup> Refer to Table 4.10-25 for MSF Operational Noise Levels  
<sup>4</sup> Logarithmic increase = Roadway Noise + Guideway Noise + Stationary MSF Noise

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251-094-20

2.0-73

Inglewood Transit Connector Project  
February 2022

## Section 4.12 Transportation

The following revision has been made to PDF TRANS-2 on Page 4.12-26 of the RDEIR:

### PDF TRANS-2 Construction Staging and Traffic Control Program

A Construction Staging and Traffic Control Program will be developed by members of the Project Task Force (as defined in the CCP), subject to review and acceptance by the City and/or the JPA, and will 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, transit 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 will be updated, developed as needed based on the following principles:

- 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 should 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.
- Entry and exit to the Market Street/Florence Avenue construction site shall be limited to right turns to/from Florence Avenue for large trucks, construction equipment, and material deliveries. An entrance off Locust Street between Florence Avenue and Regent Street will also be required to serve the contractor's offices and staging area. If required for phasing, the Locust Street entrance may also be used for large trucks, construction equipment, and material deliveries as approved by the City.

The following revision has been made to PDF TRANS-4 on Page 4.12-28 of the RDEIR:

### PDF TRANS-4 Pedestrian Access Program

A Pedestrian Access Program will be developed by members of the Project Task Force (as defined in the CCP), subject to review and acceptance by the City and/or the JPA, and will 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 Federal 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 Inglewood Unified School District 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.

#### Section 4.14 Utilities and Service Systems

The following revision has been made on Page 4.14-54, Paragraph 2, Line 3 of the RDEIR.

Moreover, SCE estimated that normal operation of the proposed PDS substation at the MSF Site would have a peak power load flow of 2,008 kilowatts (kW) and normal operation of the proposed PDS substation at the Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard station would have an estimated peak power load flow of 2,119 kW for a total of 4,127 kW.

The following revision has been made to **Mitigation Measure (MM) UT-1** on Page 4.14-55 of the RDEIR.

**MM UT-1:** Prior to the award of the DBFOM contract, and start of any demolition or construction activities, the City or DBFOM 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 proposed Project's guideway and station foundations.

Based on the information from the field investigations, the DBFOM contractor shall be responsible for confirming the location of existing utilities and 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.

#### Section 6.0 Other Environmental Considerations

The following revision has been made on Page 6.0-4, Paragraph 3, Line 4 of the RDEIR.

As shown in Table 4.5-6 in Section 4.5, the electricity demand for the proposed Project during normal operation would result in a net increase of 20,625,176 kWh (20.6 GWh) per year. In the event the MSF PDS substation is unable to operate, the electricity demand would result in a net increase of 20,789,426 kWh (20.8 GWh) per year. In the event the Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard station PDS substation is unable to operate, the electricity demand would result in a net increase of 22,109,996 kWh (22.1 GWh) per year.

#### Section 7.0 Organizations and Persons Consulted

The following revision has been made on Page 7.0-2, Subheading 7.3 of the RDEIR.

Trifiletti Consulting, Inc.

Marietta Torriente, Projects + Outreach Specialist

### 3.0 COMMENTS AND RESPONSES

This section includes copies of the comment letters received by the City of Inglewood (City) on the Recirculated Draft Environmental Impact Report (EIR). Each letter is numbered and identified for reference and the individual comments in each letter are also identified by number. Each comment letter is followed by written responses to each of the comments in that letter.

#### 3.1 INTRODUCTION

This section of the Final EIR contains the comment letters that the City received on the Recirculated Draft EIR. The letters and responses are organized by public agencies, private organizations, public businesses, and individuals. Following each comment letter is a response by the City that supplements, clarifies, or amends information provided in the Recirculated Draft EIR; that refers the reader to the appropriate place in the document where the requested information can be found; or that otherwise responds to the comment. Comments that are not directly related to environmental issues may be discussed or noted for the record. Where text changes in the Recirculated Draft EIR are warranted based upon comments on the Recirculated Draft EIR, those changes are included following the response to comment; changes to the text of the Recirculated Draft EIR are also shown in **Section 2.0: Revisions to the Recirculated Draft EIR**, where all the text changes can be found.

### 3.0 Comments and Responses Comment Letter No. 1

Gavin Newsom, Governor

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

#### DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 897-0475  
FAX (213) 897-1337  
TTY 711  
www.dot.ca.gov



Making Conservation  
a California Way of Life.

December 14, 2021

Mindy Wilcox, AICP, Planning Manager  
City of Inglewood, Planning Division  
One W. Manchester Boulevard, 4<sup>th</sup> Floor  
Inglewood, CA 90301

RE: Inglewood Transit Connector Project –  
Recirculated Draft Environmental Impact  
Report (RDEIR)  
SCH # 2018071034  
GTS # 07-LA-2018-03767  
Vic. LA-405/PM: 23.331

Dear Mindy Wilcox:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced DEIR. The Inglewood Transit Connector Project (ITC Project) is a 1.6-mile, three-station, fully elevated, electrically powered light-rail transit system, including, among other things, an Automated Transit System (ATS) mass-transit line, proposed by the City to close the last-mile gap and connect passengers between the Metro K (Crenshaw/LAX) Line and Downtown Inglewood to major event and activity centers, including the Forum, the Los Angeles Sports and Entertainment District, including SoFi Stadium, and the Inglewood Basketball and Entertainment Center (Intuit Dome). Three stations are proposed: (1) The Market Street/Florence Avenue station generally located between Market Street and Locust Street; (2) The Prairie Avenue/ Manchester Boulevard station located on the southwest corner of Prairie Avenue and Manchester Boulevard ; and (3) The Prairie Avenue/Hardy Street station located on the northwest corner of Prairie Avenue and Hardy Street. The ITC Project also includes a maintenance storage facility (MSF) for maintaining ATS trains, two power distribution substations (PDSs) for providing power to the ATS system, and public parking along the proposed alignment at the Market Street/Florence Avenue station, 150 South Market Street and the Prairie Avenue/Hardy Street station. The proposed Project is planned to operate from 6:00 AM to 12:00 AM during the week and on weekends, with the possibility of extending operation hours as needed during special events.

1-1

The project is located approximately 1.5 miles away from the Interstate 405 (I-405) and Manchester Boulevard interchange, and approximately 2 miles away from the Interstate 105 (I-105) ramps at Prairie Avenue in Inglewood.

After reviewing the RDEIR, Caltrans concurs with the following statement: "The proposed Project would result in a reduction of VMT [Vehicle Miles Traveled] under all scenarios and would not, therefore, conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Therefore, impacts during operation related to VMT would be less than significant." Thus, the following information is included for your consideration.

1-2

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Furthermore, Caltrans encourages Lead Agencies to

*"Provide a safe and reliable transportation network that serves all people and respects the environment"*

3.0 Comments and Responses  
Comment Letter No. 1

Mindy Wilcox  
December 14, 2021  
Page 2 of 2

implement Transportation Demand Management (TDM) strategies that reduce VMT and Greenhouse Gas emissions. For examples of TDM options to further reduce this project's VMT, please refer to:

- The 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), available at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>, or
- *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8) by the Federal Highway Administration (FHWA), available at <https://ops.fhwa.dot.gov/publications/fhwahop12035/index.htm>.

Also, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways such as I-405 will need a Caltrans transportation permit. Caltrans supports limiting project construction traffic to off-peak periods to the greatest extent possible to minimize potential impacts on State facilities. If construction traffic is expected to cause delays on any State facilities, please submit the Worksite Traffic Control Plans detailing these delays for Caltrans' review.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at [Emily.Gibson@dot.ca.gov](mailto:Emily.Gibson@dot.ca.gov), and refer to GTS # 07-LA-2018-03767.

Sincerely,



MIYA EDMONSON  
IGR/CEQA Branch Chief

cc: State Clearinghouse

1-3

1-4

3.0 Comments and Responses

**COMMENT LETTER NO. 1:**

Miya Edmonson, IGR/CEQA Branch Chief  
California Department of Transportation  
District 7 – Office of Regional Planning  
100 S. Main Street, MS 16  
Los Angeles, CA 90012

**Response 1-1:**

This introductory comment contains a description of the proposed ITC Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require a response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 1-2:**

The concurrence of Caltrans with the conclusion in the Recirculated Draft EIR with the Proposed Project will result in the reduction of VMT [Vehicles Miles Traveled] is noted.

**Response 1-3:**

This comment providing information on the mission of Caltrans does not raise significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 1-4:**

A Caltrans transportation permit will be obtained before the transport of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways as requested in this comment. The Construction Commitment Program (CCP) included as a component of the Proposed Project limits construction traffic to off-peak periods to the greatest extent feasible consistent with this comment. If construction traffic is expected to cause delays on any State facilities, a Worksite Traffic Control Plan will be submitted for review by Caltrans as requested in this comment.

3.0 Comments and Responses  
Comment Letter No. 2

12/27/21, 5:08 AM

Comments for Inglewood Transit Connector Project - ingewoodtransitconnector

## Comments for Inglewood Transit Connector Project

Mach, David <DMach@TorranceCA.gov>

Tue 11/30/2021 12:26 PM

To:ingewoodtransitconnector <ingewoodtransitconnector@cityofinglewood.org>;

Hi Mindy,

At the most recent public meeting on November 22, 2021 for the Inglewood Transit Connector Project, we were informed by the presenters that all comments would need to be sent directly to you at this email address by no later than December 23, 2021, in order for the comments to be included in the Draft EIR.

I would like to comment on the fact that Torrance Transit has been planning our service expansion on our bus Line 10 from Crenshaw C (Green Line) Station to Florence Ave at Locust St. This route will be called Torrance to Florence. Locust St at Florence Ave. will also become our terminus for the route and a layover stop for our operators to take breaks and use the restroom. Currently LA Metro route 211 is using this location as well. I hope that we would still be able to utilize this location for bus layover and stop in the future as part of your EIR study. This would allow seamless connections to the new Crenshaw/LAX Line and the Inglewood People Mover as well.

2-1

Our agency would also welcome discussions with your team and LA Metro regarding what will happen to this location as part of the Inglewood Transit Connector project stakeholders outreach.

Respectfully,

**David Mach (He/Him/His)**  
Senior Business Manager, Transit Planning  
City of Torrance | 20500 Madrona Avenue | Torrance, CA 90503 | 310.781.6974 voice | 310.618.6294 fax | [DMach@TorranceCA.Gov](mailto:DMach@TorranceCA.Gov)

<https://mail.cityofinglewood.org/owa/#viewmodel=ReadMessageItem&ItemID=AAMkAGEXNmQyODQxLTg4YzktNDNmOC1hNWESLTQwYjdlNjcxYW...> 1/1

3.0 Comments and Responses

### COMMENT LETTER NO. 2:

David Mach, Senior Business Manager, Transit Planning  
City of Torrance  
20500 Madrona Avenue  
Torrance, CA 90503

#### Response 2-1:

The ITC Recirculated Draft EIR Project Description provides details of the grade-separated pedestrian connection from the ITC's Market Street Station to the Metro K (Crenshaw-LAX )Line. The La Brea-Downtown Station design of the Metro K Line includes provision for a bus transfer plaza including multiple bus bays with a signalized access/egress on the north side of Florence Avenue allowing for buses traveling both eastbound and westbound to access the plaza. The existing lay over space on Locust Street will continue to be made available. The City will continue to coordinate with Torrance Transit and all other transit agencies to increase transit use. The proposed ITC Project proposes a grade-separated pedestrian connection to the Metro K Line La Brea-Downtown Inglewood Station to provide a connection from the proposed ITC Project to and from the bus plaza as well, further enhancing transit connectivity to passengers between Torrance Line 10 and other bus lines. With the proposed ITC Project Station at the Market Street Station, enhanced accessibility, amenities and safe connectivity for patrons of multiple modes (Metro's K Line, Torrance Line 10, Metro's bus lines and other municipal operators' bus lines) will be available.



# INGLEWOOD UNIFIED SCHOOL DISTRICT

401 S. Inglewood Avenue, Inglewood, California 90301 phone: (310) 419-2700

**COUNTY ADMINISTRATOR**  
Erika F. Torres, Ed.D., MSW

December 19, 2021

Via e-mail

**BOARD OF EDUCATION**  
Margaret Turner-Evans, M.A.  
President, Trustee Area 4

Ms. Mindy Wilcox  
AICP, Planning Manager  
City of Inglewood  
Planning Division

Carliss R. McGhee, Ph.D.  
Vice President, Trustee Area 2

One W. Manchester Boulevard, 4<sup>th</sup> Floor  
Inglewood, CA 90301  
inglewoodtransitconnector@cityofinglewood.org

Naomi S. Hammonds  
Member, Trustee Area 1

RE: Inglewood Transit Connector Recirculated Environmental Impact Report  
Comment Letter

Brandon G. Myers  
Member, Trustee Area 3

Dear Ms. Wilcox:

Ernesto Castillo  
Member, Trustee Area 5

**ADMINISTRATION**

Raphael Guzman  
Chief Business Official

The Inglewood Unified School District (“District”) thanks the City of Inglewood (“City”) for providing the District with the opportunity to comment on the proposed Inglewood Transit Connector Project’s (“Project”) Recirculated Draft Environmental Impact Report (“Draft EIR”) and for Mayor James Butts and his staff meeting with District’s County Administrator and District staff to discuss the potential impacts of the Project on the District’s schools.

Bernadette Lucas, Ed.D.  
Chief Academic Officer

Norberto J. Perez  
Chief Operating Officer

After reviewing the Recirculated Draft EIR and having follow up discussions with the City’s project team, we believe that with the City’s commitments, discussed below, the Revised ITC Project will support the District’s goal of increasing safe public transit, increasing access to community events, and reducing vehicle congestion in, and around, the Inglewood community. In bringing this important Project into reality, and to accomplish the City’s and District’s further shared goals of protecting the health, safety, welfare, and access to quality education of the District’s students, this letter seeks to share the district’s support of the ITC Project, and confirm the following City commitments established during conversations with the City’s project team to ensure the Project will not significantly impact Kelso Elementary School.

VACANT  
Chief Human Resources Officer

1. Construction Noise mitigation at Kelso Elementary School: The City shall require that the Project’s construction noise would not cause more than a 5 dB L<sub>MAX</sub> increase over the typical ambient noise level at the School property line during normal school hours. Activities that would exceed this threshold shall be scheduled to occur outside of normal school hours or mitigated with specific mitigation measures such as temporary sound walls, sound blankets, or other sound-attenuating devices. The City shall monitor the Project’s construction noise levels during school hours to assure compliance and shall provide monthly reports to the District.

Inglewood Transit Connector Recirculated Environmental Impact Report Comment Letter  
December 19, 2021  
Page 2

2. Utility relocations in Kelso Elementary School Vicinity: All Project utility relocations in the school vicinity shall be designed and constructed to remain within the public right-of-way and not impact school property. Relocations shall be located further away from the school as feasible and designed and constructed to current standards to assure that they create no unacceptable hazards to the school. During Project construction, any open trenches and construction equipment shall be marked and barricaded such that they are not accessible by the students or create any potential hazard to school operations. Project utility relocations or cut overs that may require disruption to school normal utility services shall be scheduled to occur outside of normal school hours with advanced notification to the District.

3-3

The District looks forward to continuing to work collaboratively with the City on this and many other projects to benefit the students and Inglewood community. If you have any questions, please contact me at [erika.torres@inglewoodusd.com](mailto:erika.torres@inglewoodusd.com).

Sincerely,

Dr. Erika F. Torres, County Administrator  
Inglewood Unified School District

**COMMENT LETTER NO. 3:**

Dr. Erika F. Torres, County Administrator  
 Inglewood Unified School District (IUSD)  
 401 S. Inglewood Avenue  
 Inglewood, CA 90301

**Response 3-1:**

This introductory comment contains a description of the objectives of the proposed ITC Project, support for the proposed ITC Project, and thanks the City of Inglewood for meeting with the District to discuss the potential effects of the Project on the District's schools. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 3-2:**

The Construction Commitment Program (CCP) included as part of the project includes a variety of measures to minimize the effects of construction on the District's schools including:

- Coordinate with the Inglewood Unified School District (IUSD) and the City to provide crossing guards at locations requested by IUSD or the City when crosswalks or sidewalks are closed. Identify temporary alternative routes to schools, working closely with IUSD and the City and disseminate this information to schools and stakeholders affected by construction.
- Coordinate with Inglewood Unified School District administrators to avoid disruptive noise during school hours, including scheduling heavy construction activities outside of school hours. The City shall require that the Project's construction noise during school hours would be limited to 5 dBA Leq 1-hour increase above the measured ambient noise levels at Kelso School property line as identified in the RDEIR. Activities that would exceed this threshold shall be scheduled to occur outside of normal school hours or mitigated with specific mitigation measures such as temporary sound walls, sound blankets, or other sound-attenuating devices. The City shall monitor the Project's construction noise levels during school hours to assure compliance. As requested by the District, monthly noise monitoring reports on noise levels during school hours at Kelso School will be provided to the District.
- 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.

- Utility Relocation Work – Utility relocations adjacent to Kelso Elementary School shall be minimized to the extent possible. Any needed relocations shall remain within the public right of way and preferably shall be relocated further away from school property where feasible. The Project will strive to prioritize avoiding utility relocation work adjacent to the School that poses a potential hazard, such as gas or water lines that operate under pressure, versus lower risk dry utilities and gravity wet utilities.
- 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.

The CCP includes a variety of construction management practices that will minimize the effect of noise from any construction during the evening and night. As identified in the responses to the comments below, the Construction Noise Control Plan has been revised to incorporate the requests and recommendations in these comments.

In addition, the CCP requires that a Community Affairs Liaison to be designated for the project respond to any complaint related to construction activities within 24 hours:

*"The Community Affairs Liaison shall be responsible for responding within 24 hours to any local complainant question about construction activities. A website will be established with project construction information and contact information for the Community Affairs Liaison. A toll-free phone line (available 24 hours a day) and website will be made a part of all construction notices and shall be posted in prominent public facing locations around the Project area and in adjacent public spaces.*

*The Community Affairs Liaison shall receive all public complaints, investigate the cause of the complaint and develop/implement feasible measures to address and resolve the cause of the complaint."*

The CCP Construction Noise Control includes a noise monitoring program to ensure that noise levels from construction will be below established standards. The following are required elements of this 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

3.0 Comments and Responses

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

An independent noise consultant will be retained to implement this program. In addition to the construction management practices identified above that will be implemented to minimize the construction noise effects on Kelso School, noise levels during normal school hours from construction activities on Prairie Avenue will be limited to 5 dBA Leq 1-hour above the ambient 1-hour Leq (dBA) noise measurements for Site C on Prairie Avenue identified in the RDEIR to ensure that noise from construction activities is compatible with Kelso School.

This comment requests that construction noise levels not exceed 5 dBA LMAX above the ambient noise level. The LMAX, or Maximum Sound Level, descriptor is the highest sound level measured during a single noise event, such as a vehicle passing by. The noise analysis in the RDEIR evaluates average 1-hour sound levels (Leq 1-hour) which are more representative of the overall noise environment than the maximum sound level of any single noise event. For this reason, as presented above, the maximum noise level from construction noise during school hours will be limited to 5 dBA Leq 1-hour above the measured ambient noise levels at Kelso School as identified in the RDEIR.

In order to ensure that acceptable noise levels are maintained at Kelso School during the school day, real time noise monitoring will be conducted at Kelso School. Any time the Leq 1 hour noise levels increase by 3 dBA during the school day, an alert message will be sent to the construction manager(s) and contact(s) for the contractor(s) working in the vicinity of the school to allow for adjustments to be made to the work in progress to avoid noise levels reaching or exceeding a 5 dBA 1-hour Leq over ambient noise levels. A contact will also be provided to the Inglewood Unified School District and administration at Kelso school to discuss activities and resulting noise levels at any time during the school day.

As requested by the District, monthly noise monitoring reports on noise levels during school hours at Kelso School will be provided to the District.

3.0 Comments and Responses

**Response 3-3:**

Based on the Inglewood Transit Connector Project Utilities Engineering Report included in Appendix Q.1 of the Recirculated Draft EIR, no conflicts with any existing utilities located near Kelso School have been identified that would require relocation of these utilities. For this reason, no impacts to Kelso School from utility relocations is anticipated.

Should, during final design of the project any utility relocations near Kelso School be determined to be necessary, this work will be conducted consistent with the District's requests marking and barricading any open trenches and construction equipment preclude access by the students or create any potential hazard to school operations. Any project utility relocations or cut overs that may require disruption to school normal utility services will be scheduled to occur outside of normal school hours with advanced notification to the District.

The following has been added to the CCP to manage utility construction work to avoid impacts to Kelso School:

- Utility Relocation Work – All Project utility relocations in the vicinity of Kelso Elementary School shall be designed and constructed to remain within the public right-of-way and not impact school property. Relocations shall be located further away from the school as feasible and designed and constructed to current standards to assure that they create no unacceptable hazards to the school. During Project construction, any open trenches and construction equipment shall be marked and barricaded such that they are not accessible by the students or create any potential hazard to school operations. Project utility relocations or cut overs that may require disruption to school normal utility services shall be scheduled to occur outside of normal school hours with advanced notification to the School District.
-

3.0 Comments and Responses  
Comment Letter No. 4

3.0 Comments and Responses  
Comment Letter No. 4



**COUNTY OF LOS ANGELES  
FIRE DEPARTMENT**

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294  
(323) 881-2401  
www.fire.lacounty.gov

"Proud Protectors of Life, Property, and the Environment"

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FIFTH DISTRICT

DARYL L. OSBY  
FIRE CHIEF  
FORESTER & FIRE WARDEN

December 8, 2021

Mindy Wilcox, Planning Manager  
City of Inglewood  
Planning Division  
One West Manchester Boulevard, 4<sup>th</sup> Floor  
Inglewood, CA 90301

Dear Ms. Wilcox:

**NOTICE OF AVAILABILITY OF A RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT, "INGLEWOOD TRANSIT CONNECTOR PROJECT," IS A 1.6-MILE, THREE-STATION, FULLY ELEVATED, ELECTRICALLY POWERED LIGHT-RAIL TRANSIT SYSTEM, INCLUDING, AMONG OTHER THINGS, AN AUTOMATED TRANSIT SYSTEM MASS-TRANSIT LINE, PROPOSED BY THE CITY TO CLOSE TO THE LAST-MILE GAP AND CONNECT PASSENGERS BETWEEN METRO K LINE AND DOWNTOWN INGLEWOOD, INGLEWOOD, FFER 2021012110**

The Notice of Availability of a Recirculated Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

**PLANNING DIVISION:**

We have no comments.

For any questions regarding this response, please contact Kien Chin, Planning Analyst, at (323) 881-2404 or [Kien.Chin@fire.lacounty.gov](mailto:Kien.Chin@fire.lacounty.gov).

4-1

Mindy Wilcox, Planning Manager  
December 8, 2021  
Page 2

**LAND DEVELOPMENT UNIT:**

1. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants. 4-2
2. All proposed structures shall comply with the County of Los Angeles Fire Code for water and access for firefighting purposes. 4-3
3. The proposed Automated People Mover shall comply with NFPA 130; Standard for Fixed Guideway Transit and Passenger Rail Systems. 4-4
4. Changes to the existing public water system such as fire hydrants and water mains for firefighting purposes shall be submitted to the County of Los Angeles Fire Department's Fire Prevention, Land Development Unit for review and approval. 4-5

Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department Land Development Unit's, Inspector Nancy Rodeheffer at (323) 890-4243.

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade. 4-6

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Nicholas Alegria at (818) 890-5719.

**HEALTH HAZARDOUS MATERIALS DIVISION:**

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department advises that the Los Angeles County Department of Public Works, Environmental Programs Division has jurisdiction for permitting, removing, and installing 4-7

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:							
AGOURA HILLS	CARSON	EL MONTE	INGLEWOOD	LAWDALE	PICO RIVERA	SIGNAL HILL	
ARTESA	CERRITOS	GARDENA	IRVINDALE	LOMITA	POMONA	SOUTH EL MONTE	
AZUSA	CLAREMONT	GLENDCORA	LA CANADA-FLINTRIDGE	LYWOOD	RANCHO PALOS VERDES	SCOTT GATE	
BALDWIN PARK	COMMERCE	HAWAIIAN GARDENS	LA HABRA	MALIBU	ROLLING HILLS	TEMPLE CITY	
BELL	COVINA	HAWTHORNE	LA MIRADA	MAYWOOD	ROLLING HILLS ESTATES	VERBON	
BELL GARDENS	CUDDEY	HERNDON BEACH	LA PUENTE	NORWALK	ROSEMEAD	WALNUT	
BELLFLOWER	DIAMOND BAR	HIDDEN HILLS	LAKEWOOD	PALMDALE	SAN DIMAS	WEST HOLLYWOOD	
BRADBURY	DUARTE	HUNTINGTON PARK	LANCASTER	PALOS VERDES ESTATES	SANTA CLARITA	WESTLAKE VILLAGE	
CALABASAS		INDUSTRY		PARAMOUNT		WHITTIER	

**3.0 Comments and Responses  
Comment Letter No. 4**

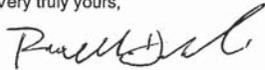
Mindy Wilcox, Planning Manager  
December 8, 2021  
Page 3

underground storage fuel tanks (USTs) at the project site. HHMD has no other comments for the project at this time.

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or [Perla.garcia@fire.lacounty.gov](mailto:Perla.garcia@fire.lacounty.gov) if you have any questions.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



RONALD M. DURBIN, CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

RMD:ac

**3.0 Comments and Responses**

**COMMENT LETTER NO. 4:**

Ronald M. Durbin, Chief of the Forestry Division  
County of Los Angeles Fire Department  
1320 North Eastern Avenue  
Los Angeles, CA 90063-3294

**Response 4-1:**

It is noted that the Planning Division had no comments on the Recirculated Draft EIR.

**Response 4-2:**

The ITC Project will comply with all applicable regulations for fire flows and fire hydrants. As described and documented in the November 2021 Recirculated Draft EIR, the ITC Project is proposed within the City of Inglewood and will be subject to the City's regulations related to construction, access and water mains.

**Response 4-3:**

The ITC Project will comply with all applicable Fire Code standards.

**Response 4-4:**

The ITC Project will comply with all applicable regulations, including the NFPA 130 Standards for Fixed Guideway Transit and Passenger Rail Systems.

**Response 4-5:**

Any changes to fire hydrants and water mains for fire fighting purposes will be submitted for review and approval by the County of Los Angeles Fire Prevention, Land Development Unit, as requested in this comment.

**Response 4-6:**

As described and documented in the November 2021 Recirculated Draft EIR, the ITC Project is proposed within the City of Inglewood and as described and, for this reason, the Project is not subject to the County's statutes and regulations related to erosion control, watershed management, rare and endangered species, vegetation, fuel modification or archeological and cultural resources or the County's Oak Tree ordinance.

As documented in Section 4.3, Biological Resources in the November 2021 Recirculated Draft EIR, the Project in and along streets in developed urbanized portions of the City of Inglewood that do not contain open space or native habitat. The Project will affect existing trees located along the proposed alignment

3.0 Comments and Responses

subject to the City of Inglewood’s Tree Preservation regulations, which address both native and non-native trees.

**Response 4-7:**

As described in the November 2021 Recirculated Draft EIR, the proposed ITC will be electrically powered and, for this reason, no underground storage fuel tanks are currently proposed as part of the Project. Should any underground storage fuel tanks be included as a component of the Project at a future date, permits for installation of these tanks will be obtained from the Los Angeles County Department of Public Works Environmental Programs Division.

3.0 Comments and Responses  
Comment Letter No. 5

12/27/21, 5:12 AM

Questions re: Vehicle Wash Facility - ingewoodtransitconnector

## Questions re: Vehicle Wash Facility

Huffman, Mandy <mandyhuffman@lacsdc.org>

Thu 12/16/2021 4:08 AM

To:inglewoodtransitconnector <inglewoodtransitconnector@cityofinglewood.org>;

Good morning Ms. Wilcox,

The Los Angeles County Sanitation Districts received a Notice of Availability of a recirculated draft EIR for the Inglewood Transit Connector Project. I am writing to seek clarifications on the Vehicle Wash Facility at the MSF for the ITC Project:

1. Will the Vehicle Wash Facility be exposed to the rain and convey rainwater to the sewer? If so, what is the square footage of the exposed area? ] 5-1
2. Will any chemicals be used to wash the trains? ] 5-2
3. Is there any plan to clean the interior of intermodal containers in the future? ] 5-3

Thank you.

**Mandy Huffman**

Environmental Planner | Wastewater Planning

562-908-4288 ext. 2743

[mandyhuffman@lacsdc.org](mailto:mandyhuffman@lacsdc.org)



[Website](#) | [Facebook](#) | [Twitter](#) | [Instagram](#) | [YouTube](#)

<https://mail.cityofinglewood.org/owa/#viewmodel=ReadMessageItem&ItemID=AAMkAGExNmQyODQxLTg4YzktdNDmOC1hNWE5LTQwYjdlNjcxYW...> 1/1

**COMMENT LETTER NO. 5:**

Mandy Huffman, Environmental Planner  
Facilities Planning Department  
Los Angeles County Sanitation Districts  
1955 Workman Mill Road  
Whittier, CA 90601-1400

**Response 5-1:**

The Vehicle Wash Facility located at the MSF would not be exposed to rain or convey rainwater to the existing sewer system. As described on page 4.14-50 of **Section 4.14: Utilities & Service Systems** in the Recirculated Draft EIR, the vehicle wash will be a stationary facility located in the MSF building where trains can be either manually or automatically moved through the wash facility. The MSF would connect to existing water and sewer lines located along Manchester Boulevard. As described on page 4.5-37 of **Section 4.5: Energy** of the Recirculated Draft EIR, water would be filtered and reused as wash and rinse water for train cars in the MSF.

**Response 5-2:**

No chemicals would be used to wash the ATS trains. As described previously in Response 5-1, the MSF would connect to existing water and sewer lines located along Manchester Boulevard. Water would be filtered and reused as wash and rinse water for train cars in the MSF.

**Response 5-3:**

The proposed Project does not include the use of intermodal containers. The interior of the ATS Trains will be cleaned using standard cleaning products and no additional wastewater will be generated.



**Robert C. Ferrante**  
Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400  
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
(562) 699-7411 • www.lacsd.org

December 23, 2021

Ref. DOC 6372459

Ms. Mindy Wilcox, AICP, Planning Manager  
Planning Division  
City of Inglewood  
One West Manchester Boulevard, 4<sup>th</sup> Floor  
Inglewood, CA 90301

Dear Ms. Wilcox:

**Recirculated DEIR Response to the Inglewood Transit Connector Project**

The Los Angeles County Sanitation Districts (Districts) received a Recirculated Draft Environmental Impact Report (DEIR) for the subject project on November 15, 2021. The proposed project is located within the jurisdictional boundaries of District No. 5. Previous comments submitted by the Districts to your agency in correspondences dated August 6, 2018, and February 8, 2021, (copies enclosed) still apply to the subject project with the following information:

1. The proposed Vehicle Wash Facility at the Maintenance and Storage Facility may require a Districts' Industrial Wastewater Discharge Permit. Project developers should contact the Districts' Industrial Waste Section at (562) 908-4288, extension 2900, to reach a determination on this matter. If this permit is necessary, project developers will be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning project construction. For additional Industrial Wastewater Discharge Permit information, go to <https://www.lacsd.org/services/wastewater-programs-permits/industrial-waste-pretreatment-program/industrial-wastewater-discharge-permits>.
2. Availability of sewer capacity depends upon project size and timing of connection to the sewerage system. Because there are other proposed developments in the area, the availability of trunk sewer capacity should be verified as the project advances. Please submit a copy of the project's build-out schedule to the undersigned to ensure the project is considered when planning future sewerage system relief and replacement projects.
3. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is used by the Districts for its capital facilities. Payment of a connection fee may be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to [www.lacsd.org](http://www.lacsd.org), under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727. If an Industrial Wastewater Discharge Permit is required, connection fee charges will be determined by the Industrial Waste Section.

6-1

6-2

6-3

3.0 Responses to Comments  
Comment Letter No. 6

Ms. Mindy Wilcox

2

December 23, 2021

4. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

6-4

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2743, or [mandyhuffman@lacsdsd.org](mailto:mandyhuffman@lacsdsd.org).

Very truly yours,

*Mandy Huffman*

Mandy Huffman  
Environmental Planner  
Facilities Planning Department

MNH:mnh

Enclosure

cc: J. Chung  
A. Schmidt  
A. Howard

DOC 6413298.D05

Meridian Consultants  
251-004-21

3.0-21

Inglewood Transit Connector Project  
February 2022



3.0 Responses to Comments  
Comment Letter No. 6

Robert C. Ferrante

Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400  
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
(562) 699-7411 • www.lacsdsd.org

February 8, 2021

Ref. DOC 6012833

Ms. Mindy Wilcox, AICP, Planning Manager  
Planning Division  
City of Inglewood  
One West Manchester Boulevard, 4<sup>th</sup> Floor  
Inglewood, CA 90301

Dear Ms. Wilcox:

**DEIR Response for Inglewood Transit Connector Project**

The Los Angeles County Sanitation Districts (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on December 28, 2020. The proposed project is located within the jurisdictional boundary of District No. 5. Previous comments submitted by the Districts in correspondence dated August 6, 2018 (copy enclosed) still apply to the subject project with the following updated information:

- All information concerning Districts' facilities and sewerage service contained in the document is current.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717 or at [araza@lacsdsd.org](mailto:araza@lacsdsd.org).

Very truly yours,

*Adriana Aza*

Adriana Aza  
Customer Service Specialist  
Facilities Planning Department

AR:ar

Enclosure

cc: A. Howard  
R. Paracuelles  
Engineering Counter

DOC 6059861.D05

Meridian Consultants  
251-004-21

3.0-22

Inglewood Transit Connector Project  
February 2022

3.0 Responses to Comments  
Comment Letter No. 6

3.0 Comments and Responses



COUNTY SANITATION DISTRICTS  
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400  
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
Telephone: (562) 699-7411, FAX: (562) 699-5422  
www.lacsd.org

GRACE ROBINSON HYDE  
Chief Engineer and General Manager

August 6, 2018

Ref. Doc. No.: 4650365

Ms. Mindy Wilcox, AICP  
Planning Manager  
Planning Division  
City of Inglewood  
One West Manchester Boulevard  
4<sup>th</sup> Floor  
Inglewood, CA 90301

Dear Ms. Wilcox:

**NOP Response for the Inglewood Transit Connector Project**

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on July 17, 2018. The proposed project is located within the jurisdictional boundaries of District No. 5. We offer the following comment:

- The proposed project may impact existing and/or proposed Districts' facilities (e.g. trunk sewers, recycled waterlines, etc.) over which it will be constructed. Districts' facilities are located directly under and/or cross directly beneath the proposed project alignment. The Districts cannot issue a detailed response to or permit construction of, the proposed project until project plans and specification that incorporate Districts' facilities are submitted for our review. To obtain copies of as-built drawings of the Districts' facilities within the project limits, please contact the Districts' Engineering Counter at [engineeringcounter@lacsd.org](mailto:engineeringcounter@lacsd.org) or (562) 908-4288, extension 1205. When project plans that incorporate our facilities have been prepared, please submit copies of the same to the Engineering Counter for our review and comment.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Adriana Raza  
Customer Service Specialist  
Facilities Planning Department

AR:ar

cc: A. Howard  
Engineering Counter

DOC: #4671386.D05

**COMMENT LETTER NO. 6:**

Mandy Huffman, Environmental Planner  
Facilities Planning Department  
Los Angeles County Sanitation Districts  
1955 Workman Mill Road  
Whittier, CA 90601-1400

**Response 6-1:**

This comment is noted. The Wastewater Ordinance requires any business that desires to discharge industrial wastewater to the Sanitation Districts' sewerage system to first obtain an Industrial Wastewater Discharge Permit. It is noted that under the District's Wastewater Ordinance truck and bus wash facilities with flows less than 1 MGY a year would be exempt from this requirement to obtain an Industrial Wastewater Discharge Permit. The vehicle train wash would be similar to a truck or bus wash facility. A final design for this component of the Project has not been completed as this time. When this facility is designed, if it is determined that the facility will generate 1 MGY or more of wastewater, an Industrial Wastewater Discharge Permit will be obtained before the Project construction as requested in the comment.

**Response 6-2:**

This comment regarding trunk sewer capacity is noted. The information discussed on pages 4.14-52-4.14-53 of **Section 4.14: Utilities & Service Systems** of the Recirculated Draft EIR demonstrates that there is sufficient trunk sewer capacity available at this time, as the proposed Project would generate less wastewater than current uses (see **Table 4.14-10**). The City will consult with LACSD to ensure the Project is considered when planning future sewer relief and/or replacement projects.

**Response 6-3:**

This comment regarding Connection Fees is noted. The ITC Project will comply with all applicable regulations, including the regulation in this comment.

**Response 6-4:**

This comment explaining LACSD's facility expansion capacities being associated with approved growth identified by SCAG is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.



**3.0 Comments and Responses  
Comment Letter No. 7**

17140 S. Avalon Blvd.  
Carson, CA 90746

310-217-2411  
www.westbasin.org

**3.0 Comments and Responses**

December 7, 2021

Mindy Wilcox - Planning Manager  
City of Inglewood  
One West Manchester Blvd.  
Inglewood, CA 90301  
inglewoodtransitconnector@cityofinglewood.org

Subject: Inglewood Transit Connector Project (SCN #2018071034)

Dear Ms. Wilcox:

Thank you for the opportunity to comment on the Recirculated Draft Environmental Impact Report dated November 15, 2021 for the Inglewood Transit Connector Project (Proposed Project). West Basin Municipal Water District (West Basin), as a wholesale supplier of imported drinking water to the City of Inglewood (City) and a producer of recycled water to the region, understands the impacts of vital development projects such as the need for public transportation, as well as the need for reliable water supplies to meet local water demands.

West Basin has produced and served recycled water to the City for more than 20 years and owns and operates a recycled water distribution system in the area within the City's Proposed Project. It is critical to note that the Proposed Project may affect West Basin recycled water distribution system, including pipelines, service lines, supportive appurtenances and cathodic protection systems currently serving the City.

West Basin looks forward to working with the City to ensure its distribution system is not adversely impacted. West Basin seeks assurance that during the planning, design, and construction phases of the Proposed Project, the City and their contractors will maintain the integrity of West Basin's distribution system and protect existing water resources for the community.

Please feel free to contact me or West Basin Operations Supervisor Frank Fuchs at (310) 660-6255 with further questions. West Basin looks forward to continuing our partnership with the City of Inglewood to deliver drinking and recycled water supplies to the City.

Sincerely,  
  
Uzi Daniel  
Manager of Operations  
West Basin Municipal Water District

7-1

**COMMENT LETTER NO. 7:**

Uzi Daniel, Manager of Operations  
West Basin Municipal Water District  
17140 South Avalon Boulevard  
Carson, CA 90746

**Response 7-1:**

As indicated in this comment, the Recirculated Draft EIR included consideration of West Basin Municipal Water District facilities, which include 4 water lines located in Prairie Avenue and Hardy Street in the vicinity of the proposed project. The Inglewood Transit Connector Project Utilities Engineering Report, provided in Appendix Q.1 of the Recirculated Draft EIR, evaluated the potential for the Project to conflict with and impact existing West Basin Municipal Water District facilities based on the as built drawings for water lines provided by the District. As shown in Table B. Inglewood Transit Connector Utility Conflict Matrix in the Utilities Engineering Report, no conflicts with the West Basin's water lines were identified.

As requested in this comment, the City and its contractors will continue to coordinate with the West Basin Municipal Water District during planning, design, and construction of the project to ensure the integrity of West Basin's distribution system is maintained.

**BOARD OF DIRECTORS**

Scott Houston <i>President</i>	Gloria D. Gray <i>Vice President</i>	Harold C. Williams <i>Treasurer</i>	Carol W. Kwan <i>Secretary</i>	Donald L. Dear <i>Immediate Past President</i>
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**GENERAL MANAGER:** Patrick Shields  
Meridian Consultants  
251-004-21

3.0-25

Inglewood Transit Connector Project  
February 2022

Meridian Consultants  
251-004-20

3.0-26

Inglewood Transit Connector Project  
February 2022

3.0 Comments and Responses  
Comment Letter No. 8



Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952  
213.922.2000 Tel  
metro.net

December 27, 2021

Mindy Wilcox, AICP  
City of Inglewood, Planning Division  
One West Manchester Boulevard, 4<sup>th</sup> Floor  
Inglewood, CA 90301  
Sent by Email: [inglewoodtransitconnector@cityofinglewood.org](mailto:inglewoodtransitconnector@cityofinglewood.org)

RE: Inglewood Transit Connector Project  
Recirculated Draft Environmental Impact Report (RDEIR) – Metro Comments

Dear Ms. Wilcox:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Inglewood Transit Connector Project (Project) located in the City of Inglewood (City). Metro’s aim is to create and maintain a world-class transportation system that focuses on providing an excellent customer experience and enhancing the quality of life for those who live, work, and play within Los Angeles County. As the public mass transportation planner, builder and operator, Metro is constantly working to deliver a regional system that supports increased transportation options and associated benefits, such as improved mobility options, air quality, health and safety, and access to opportunities.

8-1

As such, Metro supports this Project and recognizes its significance to the City and the greater Los Angeles County region. We appreciate the City’s ongoing coordination efforts on the Project, particularly with respect to the interface between the Project and Metro’s Crenshaw/LAX Line (K Line). Metro and the City already enjoy a strong collaborative working relationship on many planning efforts including the K Line, Metro-funded transit-oriented development (TOD) Specific Plans, the Inglewood First/Last Mile Plan, the Centinela/Florence Grade Separation, and event transportation demand management for SoFi Stadium and the Inglewood Basketball and Entertainment Center. We are committed to continuing this collaborative approach with respect to this Project, including the formation of a Joint Powers Authority for implementation of the Project.

Reflecting Metro’s interests in a successful ITC Project, this letter is intended to provide the City with specific comments on the Recirculated Draft EIR for the Project per Metro’s area of statutory responsibility pursuant to the California Environmental Quality Act (CEQA), and to identify opportunities for coordination and implementation of goals and policies to advance a world-class transportation network for the region. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.<sup>1</sup>

**Project Description**

The Inglewood Transit Connector Project (Project) is a 1.6-mile, three-station, fully elevated, electrically powered light-rail transit system, including, among other things, an Automated Transit System (ATS) mass-transit line, proposed by the City to close the last-mile gap and connect passengers between the Metro K (Crenshaw/LAX) Line and Downtown Inglewood to major event and activity centers, including the Forum, the Los Angeles Sports and Entertainment District, including SoFi Stadium, and the Inglewood Basketball and Entertainment Center

8-2

<sup>1</sup> See CEQA Guidelines section 15064.3(a); Governor’s Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

3.0 Responses to Comments  
Comment Letter No. 8

Inglewood Transit Connector  
RDEIR – Metro Comments  
December 27, 2021

(Intuit Dome). Three stations are proposed: (1) The Market Street/Florence Avenue station generally located between Market Street and Locust Street; (2) The Prairie Avenue/Manchester Boulevard station located on the southwest corner of Prairie Avenue and Manchester Boulevard; and (3) The Prairie Avenue/Hardy Street station located on the northwest corner of Prairie Avenue and Hardy Street. The Project also includes a maintenance storage facility (MSF) for maintaining ATS trains, two power distribution substations (PDSs) for providing power to the ATS system, and public parking along the proposed alignment at the Market Street/Florence Avenue station, 150 South Market Street and the Prairie Avenue/Hardy Street station. The Project is planned to operate from 6:00 AM to 12:00 AM during the week and on weekends, with the possibility of extending operation hours as needed during special events.

↑

**Comments**

*Interface between Metro Downtown Inglewood Station and APM Station*

Metro appreciates the coordination efforts with the APM design team over the past year regarding the interface between the Market/Florence APM Station and Metro’s Downtown Inglewood Station. As mutually identified already through these collaborations, Metro and the City will continue to coordinate on the following topics to further strengthen and optimize the performance of the APM and the Metro regional system:

- Buses operating in the vicinity of Market/Florence, including the new off-street bus hub;
- Pedestrian volumes, circulation patterns, security, and queuing accommodations for patrons transferring from the APM to the Metro Station, as well as the proposed pedestrian bridge that will link the two stations and any touchdown points for the bridge on Metro’s property;
- Coordination of projected service headways and passenger throughput under different scenarios for the Project, given K Line headways and two-car trains;
- Vertical circulation elements (e.g. escalators, elevators, and staircases);
- Maintenance and upkeep of the proposed pedestrian bridge after construction; and
- Signage for wayfinding and customer information.

8-3

*Bus Service and Intermodal Connections*

As Metro continues to advance our bus services and intermodal connections throughout the region, Metro and the City will continue to coordinate on any changes to bus service, or stops or layover locations proposed by the Project. It should be noted that in December 2021, Metro completed its implementation of the NextGen Bus Plan, a major update to Metro’s bus service network and stop locations. For more information, visit the NextGen Bus Plan’s website at <https://www.metro.net/projects/nextgen/>, as well as the service changes website at <https://mybus.metro.net/>.

8-4

Coordinated network planning will be mutually beneficial in accommodating transfer activity between bus and rail lines, bus-to-bus transfers and access of other modes (e.g., Metro Micro Transit, Metro Bike Share, TNCs, etc.) that will occur along sidewalks and public spaces. Metro has completed the Metro Transfers Design Guide, a best practices document on transit improvements. This can be accessed online at: <https://www.metro.net/about/station-design-projects/>.

*Construction Commitments Program*

Metro appreciates the inclusion of Project Design Feature PDF-TRANS-1 (Transit Access and Circulation Program). Metro respectfully suggests that PDF-TRANS-2 (Construction Staging and Traffic Control Program) be amended as follows:

8-5

- “Detour routes, including analysis of impacts to pedestrian, business, bicycle, transit, and traffic flow”

3.0 Responses to Comments  
Comment Letter No. 8

Inglewood Transit Connector  
RDEIR – Metro Comments  
December 27, 2021

*Centinela/Florence Avenues Grade Separation Project*

The Centinela/Florence Avenues Grade Separation Project, pending project construction funding availability, is projected to occur between Fall 2022 and Summer 2025, and will likely overlap with construction of the APM Project. Metro and the City will endeavor to coordinate and consider construction schedule, right of way (ROW) construction staging, construction site safety and appropriate clearances between properties and operating areas, construction traffic management (roadway closure, traffic detour, relocation of bus stops, temporary bus layover locations); shared utilities (if any), Track Allocation, and other needs as appropriate to ensure the safety and efficient construction of both projects.

8-6

*Special Permits*

Should construction or maintenance of the Project necessitate temporary or ongoing access to Metro ROW, the Project must adhere to Metro Track Allocation requirements. Permits allowing for single tracking or a power shutdown, while possible, are highly discouraged and must be obtained at least two months before start of construction. Permits for special operations, including the use of a pile driver or any other equipment that could come into close proximity or encroach on the ROW's airspace of the Overhead Catenary System (OCS) or support structures must be obtained at least one month before the start of construction. Metro and the City will work together to ensure implementation of these coordination procedures to provide for safety during construction.

8-7

In conclusion, Metro supports the successful delivery of the Inglewood Transit Connector Project and looks forward to continuing coordination with the City as the Project continues to develop. If you have any questions regarding this letter, please contact us at [yoha@metro.net](mailto:yoha@metro.net) or [lings@metro.net](mailto:lings@metro.net).

Sincerely,



Allison Yoh, Ph.D.  
Executive Officer, Mobility Corridors  
Countywide Planning & Development



Shine Ling  
Manager, Transit Oriented Communities  
Countywide Planning & Development

cc: David Mieger, Senior Executive Officer, Long Range & Mobility Corridors Planning

3.0 Comments and Responses

**COMMENT LETTER NO. 8:**

Alison Yoh  
Shine Ling  
Los Angeles Metropolitan Transportation Authority  
One Gateway Plaza  
Los Angeles, CA 90012-2952

**Response 8-1:**

This introductory comment contains a description of Metro's role in regional transportation planning and the contents of this letter. This comment supporting the ITC Project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 8-2:**

This comment contains a description of the proposed ITC Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 8-3:**

This comment summarizes the ongoing consultation between Metro and the City related to the interface and connection between the ITC Project and Metro K Line. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 8-4:**

This comment summarizes the ongoing consultation between Metro and the City related to bus service and intermodal connections. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

3.0 Comments and Responses

**Response 8-5:**

Project Design Feature PDF-TRANS-2 has been revised as requested in this comment in the Construction Commitment Program (CCP).

**Response 8-6:**

This comment references the coordination that will occur between Metro and the City related to any concurrent construction activities for the Metro Centinela/Florence Avenues Grade Separation Project and the ITC Project. This comment does not raise significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 8-7:**

This comment notifies the City that permits to allow temporary or permanent access to Metro Right-of Way during construction or for or for special construction operations will be required. This comment does not raise significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

3.0 Comments and Responses  
Comment Letter No. 9

December 2, 2021

Mindy Wilcox  
City of Inglewood - Planning Division  
One West Manchester Blvd.  
Inglewood, CA 90301

Re: Inglewood Transit Connector - Recirculated Draft Environmental Impact Report (DEIR)

Dear Ms. Wilcox,

As a co-founder of AERO Collective, with employees and clientele from the City of Inglewood and elsewhere in the County of Los Angeles, I write this letter in support of the Inglewood Transit Connector Project and the elevated, electrically powered, automated people mover. As a business owner, I am committed to keeping our business in the City of Inglewood, and as part of that commitment we back the City's plan to alleviate event day traffic congestion with the proposed Project.

9-1

As Inglewood undergoes a historic transformation into a world-class sports and events destination, I believe the ITC Project will contribute significantly to the city's economic growth by encouraging travel to and from the city via the Metro Crenshaw/LAX line and the automated people mover. In addition to the economic development this will bring, I support the City's commitment to investing in a method of transportation that is sustainable and contributes to the overall protection of the environment.

9-2

The Recirculated Draft EIR also maps out the City's Construction Plan, which promises to work with local businesses to keep potential construction interruptions at a minimum. I support the City's creation a \$5 million dollar Business Interruption fund to provide financial assistance to small "mom and pop" businesses to help offset to the extent possible, business revenue losses or increased expenses that are directly attributable to disruptions during the ITC construction activities within the ITC Project.

9-3

The ITC Project is designed to provide significant connectivity, traffic reduction, economic prosperity, and quality of life benefits to the City of Inglewood. The City needs to close first/last mile gaps between the soon to open Metro K Line (Crenshaw/LAX Line) and the housing and employment centers, and sports and entertainment venues.

9-4

Thank you for moving forward with this project, and for supporting Inglewood businesses.

  
Andrew Crane  
Co-founder Aero Collective  
209 South Market Street  
Inglewood, CA 90301

**COMMENT LETTER NO. 9:**

Andrew Crane  
Aero Collective  
209 South Market Street  
Inglewood, CA 90301

**Response 9-1:**

This comment supporting the ITC Project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 9-2:**

This comment supporting the City's objectives for the ITC Project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 9-3:**

This comment supporting the Business Assistance Fund included in the ITC Construction Commitment Program is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 9-4:**

This comment supporting the City's objectives for the ITC Project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

December 1, 2021

Mindy Wilcox  
Planning Division  
City of Inglewood  
One West Manchester Blvd.  
Inglewood, CA 90301

Re: Recirculated Draft Environmental Impact Report (EIR) on the Inglewood Transit Connector (ITC)

Dear Ms. Wilcox,

As Co-owner of Miracle Theater, with employees and clientele from the City of Inglewood and elsewhere in the County of Los Angeles, I write this letter in support of the Inglewood Transit Connector Project and the elevated, electrically powered, automated people mover. As a business owner, I am committed to keeping our business in the City of Inglewood, and as part of that commitment we back the City's plan to alleviate event day traffic congestion with the proposed Project.

10-1

As Inglewood undergoes a historic transformation into a world-class sports and events destination, I believe the ITC Project will contribute significantly to the city's economic growth by encouraging travel to and from the city via the Metro Crenshaw/LAX line and the automated people mover. In addition to the economic development this will bring, I support the City's commitment to investing in a method of transportation that is sustainable, and contributes to the overall protection of the environment. The Recirculated Draft EIR also maps out the City's Construction Plan, which promises to work with local businesses to keep potential construction interruptions at a minimum.

10-2

I support the efforts of the Business Interruption Assistance Program that the city will create a \$5 million dollar Business Interruption fund to provide financial assistance to small "mom and pop" businesses to help offset to the extent possible, business revenue losses or increased expenses that are directly attributable to disruptions during the ITC construction activities within the ITC Project.

10-3

In anticipation of the Governor releasing the new State Budget and the upcoming deliberations by the Legislature, I express my strong support for the City of Inglewood's pursuit of \$400 million for the ITC Project from the forthcoming State budget.

10-4

The ITC Project is designed to provide significant connectivity, traffic reduction, economic prosperity, and quality of life benefits to the City of Inglewood. The City needs to close first/last mile gap between Metro K Line (Crenshaw/LAX Line) and the housing and employment centers, and sports and entertainment venues.

10-5

Thank you for moving forward with this project, and for supporting Inglewood businesses.

Sincerely,



Owen Smith

**COMMENT LETTER NO. 10**

Owen Smith  
The Miracle Theater  
226 S Market St, Inglewood, CA 90301

**Response 10-1:**

This comment supporting the ITC Project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 10-2:**

This comment supporting the City's objectives for the ITC Project and the Construction Commitment Program included as part of the project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 10-3:**

This comment supporting the Business Assistance Fund included in the ITC Construction Commitment Program is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 10-4:**

This comment supporting the City pursuing available state funding for the ITC Project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 10-5:**

This comment supporting the ITC Project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.



December 22, 2021

VIA E-MAIL

Ms. Mindy Wilcox, AICP  
Planning Manager  
City of Inglewood  
One W. Manchester Boulevard  
Inglewood, California 90301

mwilcox@cityofinglewood.org;  
inglewoodtransitconnector@cityofinglewood.org

Re: Inglewood Transit Connector Environmental Impact Report Comment Letter

Dear Ms. Wilcox:

We are writing on behalf of Thomas Safran & Associates (TSA) and Black Equities Group (together, "Owner"), local stakeholders in the Inglewood Community, to provide comment on the Recirculated Draft Environmental Impact Report (RDEIR) for the Inglewood Transit Connector project (ITC, or "Project") by the City of Inglewood ("City").

11-1

TSA and Black Equities own or have an agreement with the City to purchase four properties on Market Street in close proximity to the proposed northern terminus of the ITC: the Fox Theater located at 115 North Market Street, 139 North Market Street, 158 North Market Street, and a mixed use development currently under construction at the property bordered by North Market Street, East Regent Street, North La Brea Avenue, and East Florence Avenue, referred to in the RDEIR as D-3 (collectively, "the Properties"). Each of these properties were purchased from the City with the understanding that TSA would redevelop (or in the case of the Fox Theater, adaptively reuse) them to fulfill the City's priority of establishing residential and commercial uses at these locations.

11-2

TSA and Black Equities are committed to the development and operation of the highest quality communities that enrich the lives of its residents and positively contribute to the community. TSA and Black Equities appreciate their long, positive working relationship with the City and its leaders and are very supportive of all current community development efforts. This includes support of the ITC as a new high-quality transportation option that can be compatible with the community and serve its residents. In that vein, we want to emphasize that our intention is not to stop or delay

11-3

Elisa L. Paster  
Direct Dial  
310.556.7855  
Direct Fax  
310.843.2655  
Email  
epaster@glaserweil.com

the Project, but rather to ensure the Properties, especially D-3, are protected from potential Project impacts.

↑

As D-3 was designed to achieve the City and Owner's common vision to activate and foster a robust pedestrian environment on Market Street, we see the Project as an opportunity to help facilitate that vision. Our goal throughout this process has been to ensure that the Project and Properties are developed harmoniously and to benefit the community.

11-4

After reviewing the RDEIR circulated by the City on November 12, 2021, we are pleased that some of the issues raised in our previous comment letter were addressed in the revisions found in the RDEIR. This comment letter identifies remaining, necessary revisions and mitigation measures which need to be added to the RDEIR pursuant to the California Environmental Quality Act (CEQA).

11-5

The following significant revisions need to be made to the RDEIR:

- It is unclear whether D-3 was fully analyzed as a sensitive receptor for the purposes of noise analysis. Figure 4.10-5 identifies Noise Sensitive Receptor Groups, but it does not include D-3. Given the revisions made to the Air Quality analysis based on our previous comments, this appears to be an oversight but it needs to be addressed with D-3 properly identified on a revised Figure 4.10-5; this is essential to ensuring that 1) any potential noise impacts to D-3 are fully analyzed, and 2) D-3 is treated as a sensitive receptor during the ITC's construction and operation.
- Given the proximity of D-3 to the Market Street/Florence Avenue station and construction staging area (the property bordered by Florence Avenue, Market Street, Regent Street, and Locust Street, referred to as "Construction Staging Area"), baseline noise measurements need to be taken from D-3.
- In Table 4.10-15 of the RDEIR, Site K is identified as a "Public" Existing Land Use as opposed to "Residential." Given the proximity of so many residential properties, including D-3, this should be revised to "Residential."
- The RDEIR identifies three coral trees to be removed at the Southeastern corner of D-3. Due to their size and maturity, these trees are considered *protected* by the Inglewood Municipal Code (IMC), and thus their removal would constitute an environmental impact. (IMC § 12-113(A).) Significantly, these trees appear to be in the ITC's 25 foot buffer as opposed to its actual proposed path. Accordingly, the City should include mitigation to avoid the environmental impact of removing these trees, which provide beauty and character to D-3 and the larger community.

11-6

11-7

11-8

11-9

3.0 Comments and Responses  
Comment Letter No. 11

- There appears to be an error in the Air Quality Analysis in Table 4.2-22 on page 4.2-85 of the RDEIR: the TSA Properties are referred to as “Off-Site Worker” instead of “Proposed Residence.”

11-10

We noticed the RDEIR changed the noise thresholds from *ambient + 5dBA* to a property and use-specific range, such that many activities which the DEIR considered impactful would not be considered an impact under the RDEIR. The RDEIR does not provide a rationale for this change, and it should be revised to reflect *ambient + 5dBA*, as included in the DEIR. Given the Construction Staging Area’s proximity to so many residential uses, we want to ensure proper mitigation is used to minimize the noise generated by the Project. We request that the Project implement the following noise mitigation measures to minimize noise impacts on the Properties, including D-3:

11-11

- Inclusion of a 24 foot sound wall during Project construction along Market Street at the Construction Staging Area.
- Limitation of construction hours where residential properties are within 150 feet of the construction activity, as measured on a property line to property line basis. Construction shall be prohibited between 6:00 pm and 8:00 am.
- During construction, the City shall retain an independent noise consultant to monitor noise impacts on sensitive uses generated by the Project. The noise consultant shall install sound monitoring equipment at the property lines of sensitive uses identified in the EIR. The sound monitoring equipment shall record and upload to the internet on an hourly basis Leq, Lmax, L5, L10, L50, L90, L95. The Independent Noise Monitor shall establish and maintain a website making noise measurements publicly available in real time. The threshold for sensitive uses shall be *ambient + 5dBA*, as set forth in the DEIR. The noise monitor shall be responsible for collecting fines for each violation of the established noise thresholds. Each violation of noise thresholds would be subject to an escalating fine structure of \$500 for the first violation, \$1000 for the second violation, and \$2000 for each subsequent violation over the course of a calendar month, to be paid to an affordable housing trust fund.
- Limitation of non-emergency entry/exit access to the Construction Staging Area to right turns to/from Florence Avenue.
- Use of rubber tire earth moving equipment.
- When not in use or being staged, heavy equipment shall be located as far as practicable from sensitive receptors.

11-12

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11-17

3.0 Comments and Responses  
Comment Letter No. 11

- Staging of construction material deliveries behind fencing to minimize noise emitting from idling vehicles.
- On site-signage at the Construction Staging Area reminding workers to minimize noise generation.
- Use of drill piles or sonic or vibratory pile drivers instead of traditional impact pile drivers, as permitted by geological conditions.
- Sequence noisy activities to occur during the same time period during daytime hours.
- Select quieter demolition methods where appropriate.
- All trucks removing materials from the Construction Staging Area to be loaded within the site perimeter (and will be required to cover loads as deemed necessary for dust control).

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In addition to the noise-specific mitigation measures listed above, we have identified the following mitigation measures which should be incorporated into the Project:

11-24

- Funding to rehabilitate the Fox Theater, a historic resource which is listed on the National Register of Historic Places, to address noise, vibration, and aesthetic impacts caused by the construction and operation of the Project.
- Construction night lighting abatement during construction, including light shields. Flood lighting or lighting that creates fugitive light impacts shall be prohibited within 150 feet of sensitive uses, as measured from property line to property line, between 8:00 pm and 7:00 am.
- Dust control - street washing, building cleaning, and resident car washes to be provided by the Project.
- Rumble strips at truck entry/exit ways at the Construction Staging Area, watering down stockpiles and surfaces as required, covering of stocks while minimizing piling of material, and use of street sweepers to maintain adjacent roadways.

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Finally, we are requesting that we be provided notice for all Project notifications. We had previously requested to be added to the list of interested parties, but did not received the Notice of Availability for the RDEIR.

11-29

3.0 Comments and Responses  
Comment Letter No. 11

Thank you for taking the time to consider these comments. TSA and Black Equities remain committed to a productive partnership with the City to realize a vision together for a sustainable and transit-oriented community around the ITC that achieves Project goals in a manner that is sensitive to community and stakeholders that are heavily invested in its success.

Respectfully,



ELISA L. PASTER  
of GLASER WEIL FINK HOWARD AVCHEN & SHAPIRO LLP

ELP:eg

3.0 Comments and Responses

**COMMENT LETTER NO. 11**

Elisa Paster  
Glaser Weil Fink Howard Avchen & Shapiro LLP  
10250 Constellation Boulevard  
19th Floor  
Los Angeles, CA 90067

**Response 11-1:**

This introductory comment stating that the comments in this letter were submitted on behalf of Thomas Safran & Associates (TSA) and Black Equities Group is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 11-2:**

This comment identifying the properties in Inglewood that TSA have an interest in is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 11-3:**

This comment supporting the ITC Project while ensuring that potential impacts from the project on TSA's properties, specifically the mixed-use development currently under construction at the property bordered by North Market Street, East Regent Street, North La Brea Avenue, and East Florence Avenue, referred to in the Recirculated Draft EIR as D-3 are addressed is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 11-4:**

This comment describing the intent of the D3 mixed use project to assist in meeting the City's objectives to create a pedestrian oriented environment on Market Street is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the

Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 11-5:**

This comment recognizes that issues previously raised are addressed in the Recirculated Draft EIR and introduces the following comments, which are addressed below.

**Response 11-6:**

The receptor groups identified in the EIR assess potential noise impacts on representative noise-sensitive receptors where baseline noise monitoring was conducted. Monitoring was not conducted at every sensitive use but instead at the sensitive uses located closest to the proposed alignment for the project. Monitoring to determine ambient noise levels and analysis at the locations of sensitive uses located further away from the proposed alignment is not needed to identify the potential worst-case impacts and appropriate mitigation measures. Noise impacts will be less at all locations further away from the proposed alignment than the closest receptors analyzed in the Recirculated Draft EIR.

The “D-3 property” (site of the Market Gateway Project) is bordered by Market Street, Regent Street, La Brea Avenue, and Florence Avenue. The noise analysis included monitoring at the D-3 property. Monitoring Site K, at 205 N. Market Street, as identified in the Recirculated Draft EIR Noise section, is at the corner of Regent Street and Market Street at the D-3 property. The construction noise impacts at Site K are representative of the noise levels that would be experienced at the D-3 property. For this reason, the Recirculated Draft EIR adequately analyses and discloses the potential noise impacts to sensitive uses at the D-3 property.

Implementation of the construction management measures identified in Section 11.0, Noise and Vibration Control Program of the Construction Commitment Program will minimize noise and vibration impacts from construction of the project on all sensitive uses, including the D-3 property, located along the proposed alignment whether these uses are specifically analyzed in the Recirculated Draft EIR or not. As documented in the Recirculated Draft EIR, impacts from construction noise will be less than significant.

**Response 11-7:**

Please see Response 11-6, additional noise measurements at the D3 site are not necessary as Monitoring Site K is located at the D-3 Property.

**Response 11-8:**

Site K, is located at 205 N. Market Street, which is the corner of the D-3 Property. As recommended in this comment, as a mixed-use residential building has been built at this location, the identification of the existing land use at this location has been revised to “Residential” in Tables 4.10-12, 4.10-13, 4.10-15, 4.10-16, 4.10-17, 4.10-18, 4.10-19, 4.10-20, 4.10-21, 4.10-22, 4.10-23, 4.10-24, and 4.10-25.

Please note that construction of this new mixed-use building had not begun in November 2018 when noise monitoring was first conducted at this location. At that time, a public parking lot was located on the northwest corner of N. Market Street and E. Regent Street and the rest of the block between N. Market Street, E. Regent Street, E Florence Avenue and N. La Brea Avenue was vacant. This monitoring location was identified as “Public” because a public parking lot was the use in November 2018. This parking lot was subsequently removed as part of the construction of the new mixed-use project at this location.

**Response 11-9:**

The Recirculated Draft EIR correctly identifies the coral trees located along the D3 property as protected (see **Table 4.3-5** in the Recirculated Draft EIR). Based on review of the conceptual plans for the ITC Project, these Coral Trees can be retained in place.

**Response 11-10:**

Table **4.2-22** has been corrected as the TSA Properties were identified “Off-Site Worker” in error in this table. **Table 4.2-22** has been corrected to match Table 19 in the Air Quality and Health Risk Assessment Technical Report for the ITC Project in Appendix G.1 of the Recirculated Draft EIR which correctly identifies the TSA Properties as “Proposed Residence (TSA Property)”.

**Response 11-11:**

The rationale for the construction noise thresholds is provided in Section 4.11.6.1 Construction noise on pages 4.10-56 and 4.10-57 of the Recirculated Draft EIR. As discussed in that section, because the City’s General Plan and Municipal Code do not establish maximum noise levels for construction activities, as part of the preparation of the December 2020 Draft EIR, the City reviewed and considered the thresholds of significance used by other jurisdictions and used the significance thresholds for construction noise identified in the City of Los Angeles 2006 L.A. CEQA Thresholds Guide. The City of Los Angeles no longer uses these thresholds and is presently developing new thresholds for use in determining the significance of construction noise.

For this reason, the City identified thresholds for the purpose of determining the significance of construction noise in the Recirculated Draft EIR based on guidance in the FTA *Transit Noise and Vibration*

3.0 Comments and Responses

*Impact Assessment Manual*. As presented in this section. The FTA's General Assessment Construction Noise Criteria identifies daytime and nighttime thresholds for residential, commercial, and industrial land uses, which are considered reasonable criteria for use in assessing the potential for adverse community reaction to noise generated by construction activities. The use of these thresholds in this Recirculated Draft EIR responds to the unique circumstances of the proposed Project and its alignment along the fixed guideway corridor.

It should also be noted that the CCP requires preparation of a Noise Control Plan and also requires that a Community Affairs Liaison to be designated for the project respond to any complaint related to construction activities within 24 hours:

*"The Community Affairs Liaison shall be responsible for responding within 24 hours to any local complainant question about construction activities. A website will be established with project construction information and contact information for the Community Affairs Liaison. A toll-free phone line (available 24 hours a day) and website will be made a part of all construction notices and shall be posted in prominent public facing locations around the Project area and in adjacent public spaces.*

*The Community Affairs Liaison shall receive all public complaints, investigate the cause of the complaint and develop/implement feasible measures to address and resolve the cause of the complaint."*

**Response 11-12:**

Based on the analysis of potential construction noise impacts in the Recirculated Draft EIR, a noise barrier is not required at the location on Market Street to mitigate potential construction noise impacts at the D3 and the other properties identified in this letter. The results of the analysis of construction noise at Site K at the D3 Property for Phases 1 through 8 of construction presented in Tables 4.10-15 through 4.10-22 of the Recirculated Draft EIR indicate that construction noise at this property will not be significant. Ambient plus construction noise at Site K would range from a low of 63.5 Leq 1-hour during the nighttime during Phase 2 to a high of 77.6 dBA 1-hour Leq during the daytime during Phase 2, when construction noise would result in an increase above ambient noise level of approximately 10 dBA.

As discussed in the Recirculated Draft EIR, the Construction Noise Control and Vibration Reduction Plans included in the CCP contain a robust set of construction management practices that will be implemented throughout construction of the project to control and minimize construction noise. PDF NOISE-1 and PDF NOISE-2 incorporate the preparation of the Construction Noise Control and Construction Vibration Reduction Plans identified in the Construction Commitment Program (CCP) as requirements of the project.

3.0 Comments and Responses

With implementation of the construction management measures in the CCP construction noise impacts will be less than significant and, for this reason, no mitigation measures to reduce construction noise, since as the construction of a noise barrier as suggested in this comment, are required.

As identified in the responses to the comments, the Construction Noise Control Plan has been revised to incorporate the requests and recommendations in these comments 11-15, 11-16, 11-17, 11-18, 11-19, 11-20, 11-21, 11-22, 11-23, 11-27, and 11-28 to further reduce the less than significant noise impact during construction.

**Response 11-13:**

See Response 11-12 above regarding the Project's less than significant noise impact during construction. The requested hours limitation is, therefore, not required to mitigate any significant noise impact. Notwithstanding, the CCP includes a variety of construction management practices that will minimize the effect of noise from any construction during the evening and night. As identified in the responses to the comments 11-15, 11-16, 11-17, 11-18, 11-19, 11-20, 11-21, 11-22, 11-23, 11-27, and 11-28 below, the Construction Noise Control Plan has been revised to incorporate the requests and recommendations in these comments.

**Response 11-14:**

As discussed in Response 11-12, the noise analysis in the Recirculated Draft EIR concludes that noise impacts from construction will be less than significant with implementation of the construction management measures in the CCP, which requires the preparation and implementation of a construction noise monitoring plan by an independent noise consultant, in consultation with, and subject to the approval of, the City's Director of Public Works.

The CCP Construction Noise Control Program includes a noise monitoring program to ensure that noise levels from construction will be below the standards of significance. The following are required elements of this 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

*3.0 Comments and Responses*

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

As described in the Recirculated Draft EIR, a Joint Powers Authority (JPA) has been established to enforce contract requirements, including implementation of all of the construction management measures in the CCP. The JPA will have the authority to stop work and withhold payment if all terms of the contract are not met. For this reason, the establishment of a system of fines for not complying with the noise control program requirements in the CCP is not necessary.

The additional recommendations in this comment were reviewed and considered by the City and determined not to be necessary to ensure that noise from construction noise is controlled in a manner that will avoid significant impacts on noise sensitive uses located along the proposed alignment for the project.

**Response 11-15:**

Consistent with the request in this comment the CCP has been revised by the City to include the following as a courtesy to the commenter. Please note this measure is not mitigation and is not required to mitigate construction noise impacts to a less than significant level.

- Entry and exit to the Market Street/Florence Avenue construction site shall be limited to right turns to/from Florence Avenue for large trucks, construction equipment, and material deliveries. An entrance off Locust Street between Florence Avenue and Regent Street will also be required to serve the contractor's offices and staging area. If required for phasing, the Locust Street entrance may also be used for large trucks, construction equipment, and material deliveries as approved by the City.

Please note this construction management measure is not mitigation and is not required to mitigate construction noise impacts to a less than significant level.

**Response 11-16:**

As requested in this comment the CCP has been revised by the City to include the following as a courtesy to the commenter.

*3.0 Comments and Responses*

- Unless deemed infeasible for a particular construction activity, the Contractor shall utilize rubber tire earth moving equipment in lieu of track mounted earth moving equipment.

**Response 11-17:**

As requested in this comment the CCP has been revised by the City to include the following as a courtesy to the commenter.

- When not in use or being staged, heavy equipment shall be located as far as practicable from residential areas, businesses, and pedestrian pathways.

Please note this construction management measure is not mitigation and is not required to mitigate construction noise impacts to a less than significant level.

**Response 11-18:**

As requested in this comment the CCP has been revised by the City to include the following as a courtesy to the commenter.

- Staging of construction material deliveries behind fencing to minimize noise emitting from idling vehicles.

Please note this construction management measure is not mitigation and is not required to mitigate construction noise impacts to a less than significant level.

**Response 11-19:**

As requested in this comment the CCP has been revised by the City to include the following as a courtesy to the commenter.

- On site-signage reminding workers to minimize noise generation.

Please note this construction management measure is not mitigation and is not required to mitigate construction noise impacts to a less than significant level.

**Response 11-20:**

As requested in this comment the CCP has been revised by the City to include the following as a courtesy to the commenter.

- For project foundations, consider the use of drilled piles or sonic pile drivers or vibratory pile drivers instead of traditional impact pile drivers, as permitted by geological conditions.

Please note this construction management measure is not mitigation and is not required to mitigate construction noise impacts to a less than significant level.

3.0 Comments and Responses

**Response 11-21:**

As requested in this comment the CCP has been revised by the City to include the following as a courtesy to the commenter.

- Sequence noisy activities to occur during the same general time period during daytime hours to the extent practical.

**Response 11-22:**

As requested in this comment the CCP has been revised by the City to include the following as a courtesy to the commenter.

- Select quieter demolition methods where appropriate and feasible such that demolition activities can remain within the project specified noise levels.

Please note this construction management measure is not mitigation and is not required to mitigate construction noise impacts to a less than significant level.

**Response 11-23:**

As requested in this comment the CCP has been revised by the City to include the following as a courtesy to the commenter.

- Staging of construction material deliveries behind fencing to minimize noise emitting from idling vehicles.

Please note this construction management measure is not mitigation and is not required to mitigate construction noise impacts to a less than significant level.

**Response 11-24:**

The additional measures recommended for consideration by the City related to items other than noise are addressed individually in the following responses. Please note that the measures the City is voluntarily adding to the CCP are not mitigation and are not required to mitigate any significant impact as noted in the responses below.

**Response 11-25:**

The City has obtained \$8.5 million of state funding allocations for the City of Inglewood and its efforts to improve Market Street through a Streetscape Improvement Program and a Street Façade & Tenant Improvement Program.

3.0 Comments and Responses

The analysis in the Recirculated Draft EIR in Sections 4.1 Aesthetics, 4.4 Cultural Resources, and 4.10 Noise and Vibration concluded that construction and operation of the ITC Project will not result in significant aesthetic noise or vibration impacts on the Fox Theater building or significant impacts to the historic characteristics of the building and, for this reason, allocation of funds from this program are not required to mitigate significant impacts.

Funds from this program will be available for improvements to buildings located on Market Street, including the Fox Theater Building.

**Response 11-26:**

As requested in this comment the CCP has been revised to include the following measure to limit lighting during construction.

- Construction night lighting shall be shielded to prevent a direct view of the light sources from residential properties with a property boundary that is within 150 feet of the construction site.

Please note this construction management measure is not mitigation and is not required to mitigate construction noise impacts to a less than significant level. The analysis in the Recirculated Draft EIR concluded potential impacts from temporary lighting during construction would be less than significant.

**Response 11-27:**

As requested in this comment, the CCP has been revised to include the following:

- Dust shall be controlled per local ordinances. The Contractor shall be responsible for excessive dust or construction debris that results in impacts to adjacent residences or private vehicles, including taking responsibility for clean-up and addressing complaints brought to the project.

Please note this construction management measure is not mitigation and is not required to mitigate construction air quality impacts during construction to a less than significant level. The analysis in the Recirculated Draft EIR concluded potential impacts from temporary lighting during construction would be less than significant.

**Response 11-28:**

As requested in this comment, the CCP has been revised to include the following:

- Rumble strips or signage shall be provided at roadway access points into contractor laydown and staging areas to slow construction vehicles and limit vehicle noise.
- All trucks carrying fill materials, debris, or similar materials shall secure and cover loads to prevent dust or debris while travelling on public right of ways.

3.0 Comments and Responses

- All trucks removing materials from the site will be loaded within the site perimeter and will be required to cover loads as deemed necessary for dust control.
- Material stockpiles and construction area surfaces shall be covered and/or watered as needed to prevent dust at designated construction areas.

Please note these construction management measures are not mitigation and are not required to mitigate construction air quality impacts to a less than significant level.

**Response 11-29:**

As requested in this comment, the commenter has been added to the City's notification list for this project and will receive all future project notifications.

3.0 Comments and Responses  
Comment Letter No. 12

**City of Inglewood Planning Division**  
One W. Manchester Boulevard, 4th Floor, Inglewood, CA 90301  
Attn: Mindy Wilcox, AICP, Planning Manager

December 27<sup>th</sup>, 2021

Dear Ms. Mindy Wilcox,

Leitner-Poma of America, Inc. offers a complete line of cable transportation systems, including chairlifts, aerial gondolas & trams, Automated People Movers, etc., all manufactured in our factories in Colorado and Europe.

We also have more than 80 years of experience in the ropeways design and construction and we have more than 60 references of APM's and funicular railways all over the world. Therefore, we are fully equipped to produce entire cable propelled APM systems, including all designing, engineering, construction, fabrication as well as operation and maintenance of our systems. For example, we built one of the APM in the Miami International Airport APM which we successfully operate with an availability rate of 99.8%.

We have read your technical data and needs in the Recirculated Draft of EIR for the Inglewood Transit Connector Project and we confirm our interest in this project. However, the technical data suggested in the document are very oriented towards a self-propelled APM technology and do not offer any room for a cable propelled system. For this reason, we would like to communicate our comments and suggestions regarding the APM configuration which you will find in the attached pdf presentation. We hope that our suggestions will be taken into account for the upcoming RFP process in order to allow the cable propelled APM technology among the bidders.

Additionally, we have the following questions:

- Do you know which license(s) are needed to perform this project in Inglewood? For instance, is an elevator license needed?
- Is there a RFQ phase before the RFP process? If yes, which is the schedule?
- Will the construction be under a turnkey contract or will you organize a process apart for the APM equipment manufacturer selection? In this case, what will be the exact SOW?
- Is there any possibility that this project will be released as a Public Private Partnership (PPP)?

We appreciate the time you took reading our comments and suggestions and we look forward to receiving your answers.

Sincerely,



Frederic Demoulin  
**Urban Ropeways Project Manager**  
**Leitner-Poma of America, Inc.**  
Cell: 970.261.3247 | Office: 970.241.4442  
Email: [frederic.demoulin@poma.net](mailto:frederic.demoulin@poma.net)



12-1

12-2

# Inglewood Transit Connector Project Cable Propelled Technology



December 27th, 2021

Meridian Consultants  
2511-004-21

3.0-53

Inglewood Transit Connector Project  
February, 2022



## SYSTEM SPECIFICATION – technical data system performance

Our proposal for the Inglewood Transit Connector project is a cable-propelled system with vehicles, based on well-known and proven POMA technologies: system similar to the ones that our group designed, manufactured, operated and maintained in Pisa and Miami airports. It is a proven technology system which provides an availability rate over 99.5%.

This is a fully automated operating transport system that does not require any manual intervention on board or at the stations. In fact, the control system is automatically operated. The transportation system is controlled by a Central Control Room.

This type of transportation system has been designed taking into account some fundamental criteria that make it more attractive than others.

Its major characteristics, in addition to lightness and flexibility, are:

- the service will be continuous, with short waiting time for passengers;
- the system will ensure maximum comfort (minimal noise and vibrations);
- the system will be accessible to people with disabilities and the elderly;
- this system offers extraordinary service performances;



Meridian Consultants  
2511-004-21

3.0-54

Inglewood Transit Connector Project  
February, 2022



### SYSTEM SPECIFICATION – technical data system performance

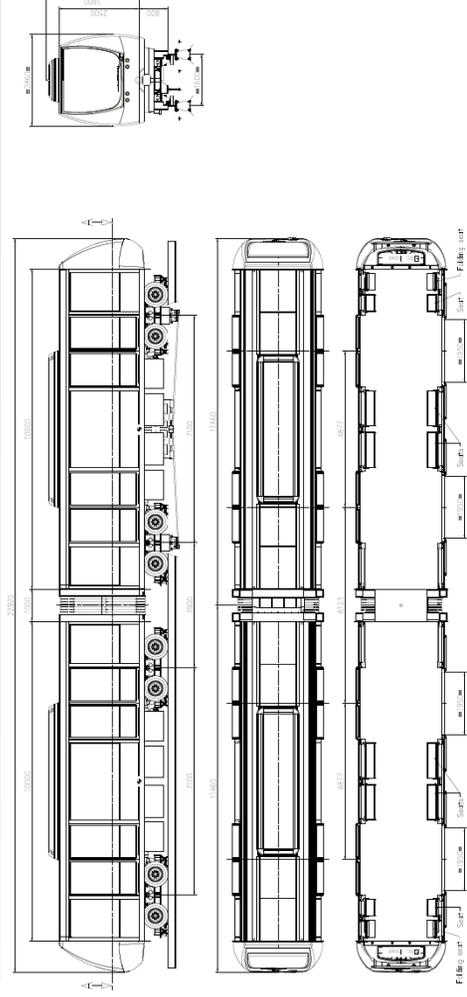
The proposed system operates in a fully automated scheduled mode, with 4 trains operating in **pinched loop mode** on dual lane, achieving a system capacity over 2000 /11000 pphpd.

Schematic diagram

### SYSTEM SPECIFICATION – technical data system performance normal weekday

parameters	during normal weekday
Operating Mode	Pinched Loop
Guideway	Dual lane with switches in front of station
System length (m)	2355
Stations	3
System capacity (pphpd)	<b>2247</b>
Required capacity (pphpd)	1950
Speed (m/s)	8 m/s - 8 m/s
Acc / deceleration (m/s <sup>2</sup> )	0,3
Dwell time (mn)	2,1
Headway (mn)	5,4
Required headway (mn)	6,0
Train configuration.	2-car trains
Fleet size	4 trains
Train capacity	202 pass at 4 pass/m <sup>2</sup> (2,7 sqft/pass)
Drive / propulsion	4 independent drive machines & rope loops

## SYSTEM SPECIFICATION – General Layout



### NORMAL OPERATION

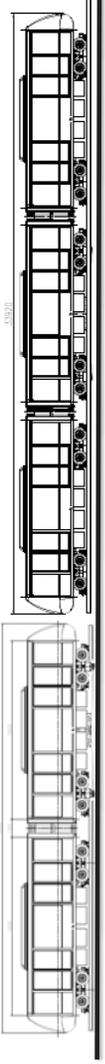
- Two W2 car train : (Meaning of W2: W: Wide cabin; 2 doors per side)
- Floor area with gangway: 50,4m<sup>2</sup>
- Train capacity: 202 pass with 4 passengers/m<sup>2</sup>

## SYSTEM SPECIFICATION – technical data system performance during events

parameters	All Other events	NFL events
<b>Operating Mode</b>	Pinched Loop	Pinched Loop
<b>Guideway</b>	Dual lane with switches in front of station	Dual lane with switches in front of station
<b>System length (m)</b>	2355	2355
<b>Stations</b>	3	3
<b>System capacity (pphpd)</b>	<b>9911</b>	<b>11646</b>
<b>Required capacity (pphpd)</b>	9700	11400
<b>Speed (m/s)</b>	11 m/s (*) - 14 m/s	11 m/s (*) - 14 m/s
<b>Acc / deceleration (m/s<sup>2</sup>)</b>	0,6	0,6
<b>Dwell time (mn)</b>	0,6	0,6
<b>Headway (mn)</b>	3,1	3,1
<b>Required headway (mn)</b>	2,4	2,0
<b>Train configuration.</b>	5-car trains	5-car trains
<b>Fleet size</b>	4 trains	4 trains
<b>Train capacity</b>	502 pass at 4 pass/m <sup>2</sup> (2,7 sqft/pass)	598 pass at 4,7 pass/m <sup>2</sup> (2,3 sqft/pass)
<b>Drive / propulsion</b>	4 independent drive machines & rope loops	4 independent drive machines & rope loops

(\*): Between Florence station and Manchester station, the running tracks in tight radius curves will have super-elevation

### SYSTEM SPECIFICATION – General Layout



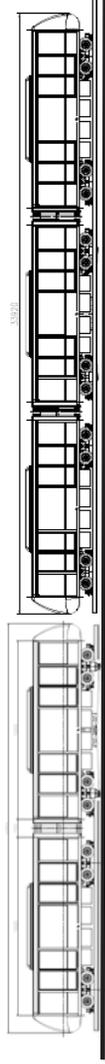
#### OPERATION DURING EVENTS

Five W2 car train : (Meaning of W2: W: Wide cabin; 2 doors per side)

- Floor area with gangway: 509m<sup>2</sup>
- Train capacity: 509 pass at 4 pass/m<sup>2</sup> (others events)
- Train capacity: 598 pass at 4,7 pass/m<sup>2</sup> (NFL events )

### SYSTEM SPECIFICATION – Train fleet

The train fleet is composed of Four 5-car-trains  
 Each train is composed of one 2-car train and one 3-car train



	Trains in operation	Trains in garage and/or in Maintenance
normal weekday	Peak period	Four 3-car trains
	Off-peak period	Four 3-car trains + Two 2-car trains
All Other events	Four 5-car trains	0
NFL events	Four 5-car trains	0

## SYSTEM SPECIFICATION – how the system works?

### Haul rope performs all critical functions

#### Haul rope performs propulsion

- The haul rope is propelled by a stationary drive unit

#### Passive trains

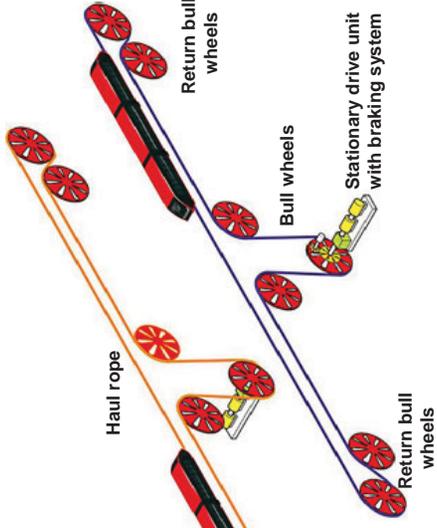
- no on-board engines or braking systems

#### Connection via grip

- Trains are directly connected to the cable via a detachable grip

#### Proven technology

- more than 100 years, in similar applications



## SYSTEM SPECIFICATION – technical data system performance

### Rope system principle:

The ATC system supervises all systems of the APM. All systems are controlled and commanded to guarantee the maximum of safety, reliability and availability of the APM.

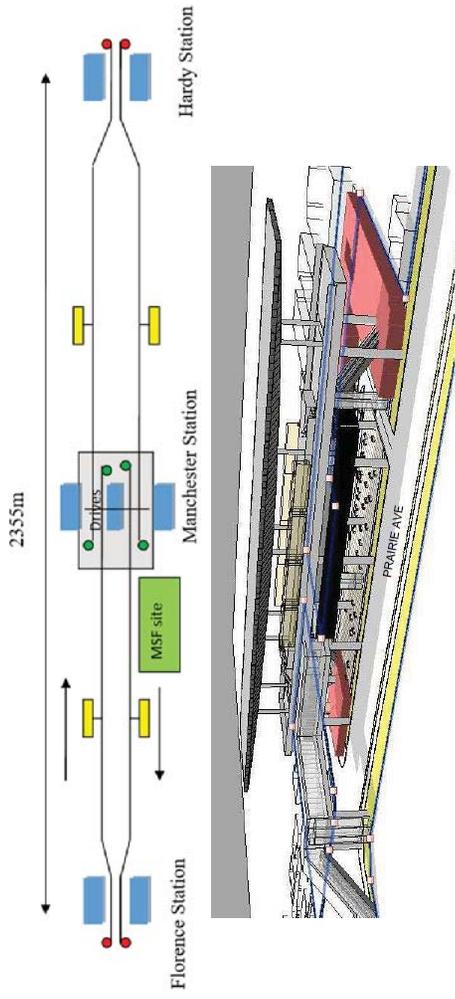
**The main link of all components in our system is the rope. This means that:**

- 1) **Acceleration and deceleration are not depending anymore on the friction between the track and the tires. The rope is insuring this function properly in any weather conditions**
- 2) **The exact position and speed of each train is always well known and properly monitored**

The rope is driven by an electrical motor. The drive bull wheels in the drive machine room and the sheaves all along the track connect the passenger vehicle to the machine. The vehicles are operated with simple technology and can be adapted to provide an aesthetic appeal and in accordance with the project specifications.

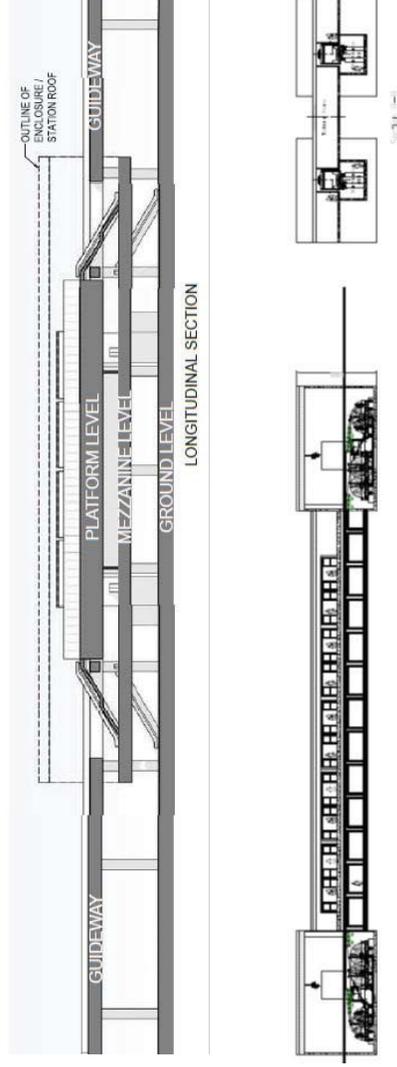
### SYSTEM SPECIFICATION – General Layout

With rope technology, drive machineries, returns and tensioning rooms are necessary in stations and can be located below the APM track at mezzanine level or ground level.



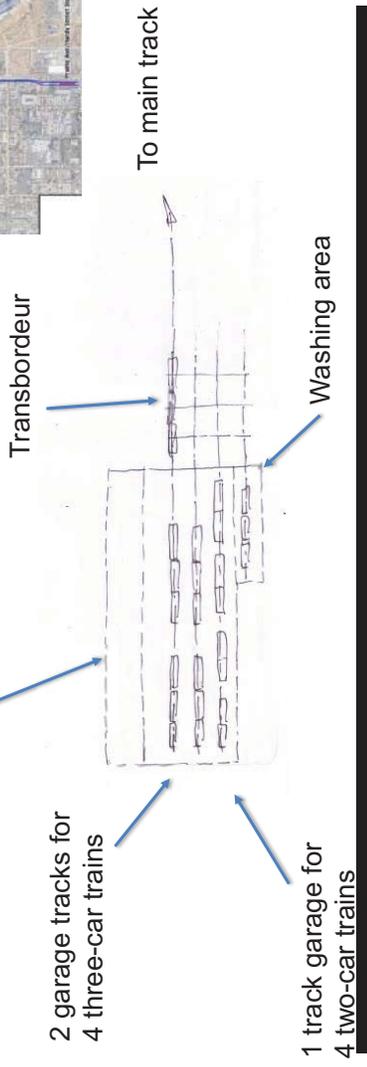
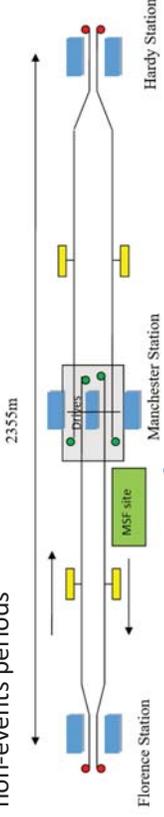
### SYSTEM SPECIFICATION – General Layout

With rope technology, drive machineries, returns and tensioning rooms are necessary in stations and can be located below the APM track at mezzanine level or ground level.



### SYSTEM SPECIFICATION – General Layout

In the Inglewood system, MSF site is needed to park the trains during non-events periods



2 garage tracks for  
4 three-car trains

1 track garage for  
4 two-car trains

### SYSTEM SPECIFICATION – subsystem - Bogie



- The bogie is passive
- It is a mechanical steel frame bogie with few moving parts
- No engines, no brakes → **no maintenance**
- **Integrated running surface and guiderail**

## SYSTEM SPECIFICATION – subsystem - bogie



### Cable-propulsion bogie

Simple mechanical steel frame bogie  
Few moving parts  
Low weight  
Low maintenance  
NO off-line maintenance depot required



### Self-propulsion bogie

Complex bogie  
Heavy weight due to integrated systems  
integrated drive, braking and hydraulic components  
Maintenance intensive  
Requires off-line maintenance depot

## SYSTEM SPECIFICATION – subsystem – propulsion machinery

### DIRECT DRIVE TECNOLOGY



The Direct Drive technology (Direct Drive type) has been developed and established since 1999 on our machines.

The operational availability rate and the reliability have been the mains axes of its development.

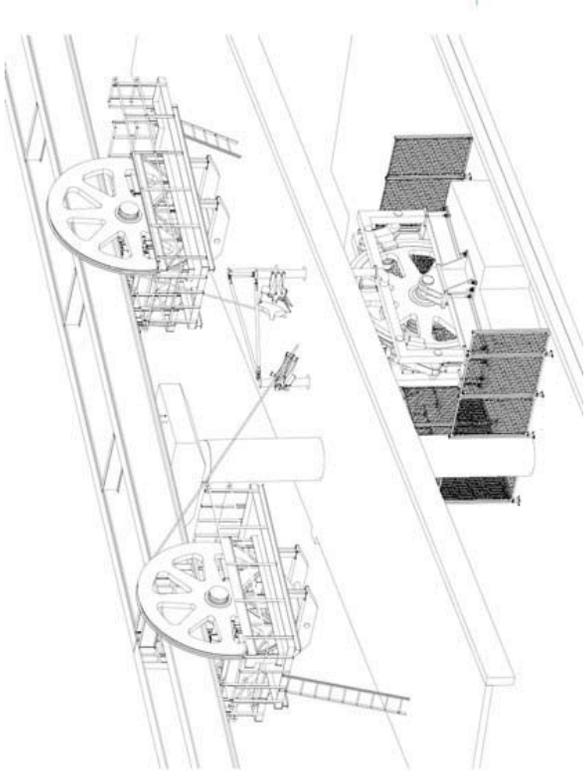
The Direct Drive technology highly improved the ease of the passengers and the security of the workers.



### ADVANTAGES AND SOLUTIONS

- Gains in energy consumption (from +5% until 8% of consumption savings)
- Financial gains on Maintenance (saving maintenance costs and gearbox maintenance)
- A greater safety for the operating staff (No visible rotating part, everything is integrated in the frame)
- Upgrade of operational availability rate (in case of failure of some part(s) of the permanent magnets and/or windings, the engine is running normally with 50% until 75% of the nominal torque (depending on the configuration)
- Ecological (No gear reducer oil)

SYSTEM SPECIFICATION – subsystems – drive propulsion lay-out

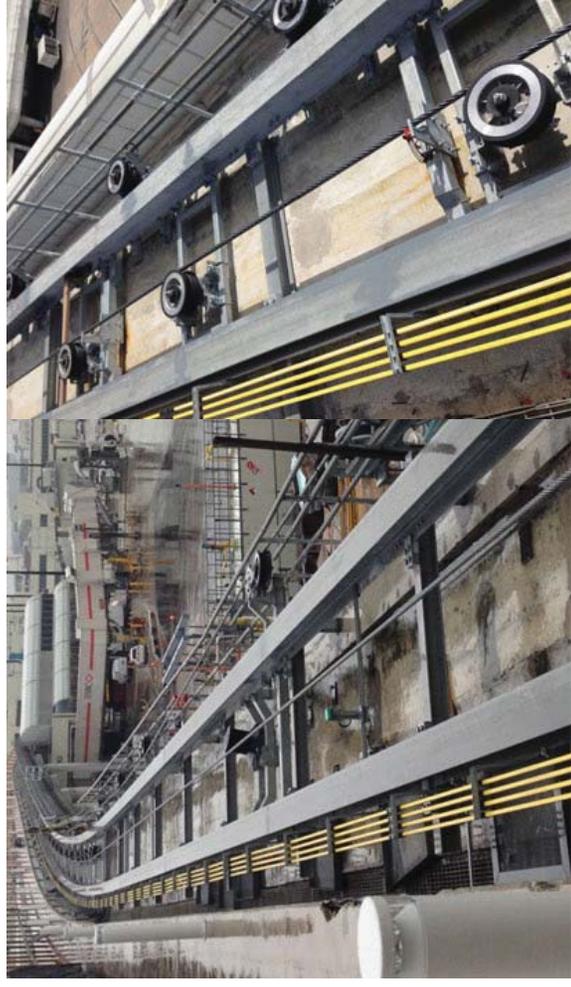


Meridian Consultants  
251-004-21

3.0-69



SYSTEM SPECIFICATION – subsystem - guideway equipment

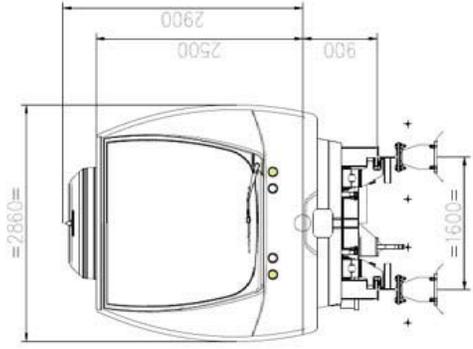


Meridian Consultants  
251-004-21

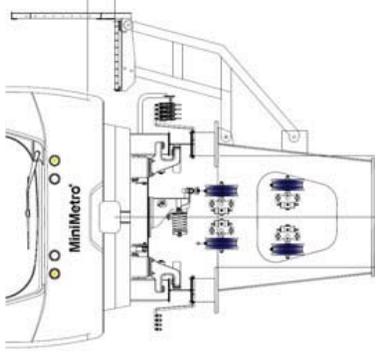
3.0-70



### SYSTEM SPECIFICATION – guideway running surface



Base running track  
section



Guideway structure: Leitner-Poma  
development

### SYSTEM SPECIFICATION – guideway running surface



Principle  
section

(\*): Between Florence station and Manchester station, the running tracks in tight radius curves will have superelevation to accept the 11 m/s speed.

These superelevation's are necessary to preserve the passengers' comfort and respect the maximum transversal accelerations.

The maximum slope of the superelevation is 10%.

## SYSTEM SPECIFICATION – subsystem - trains



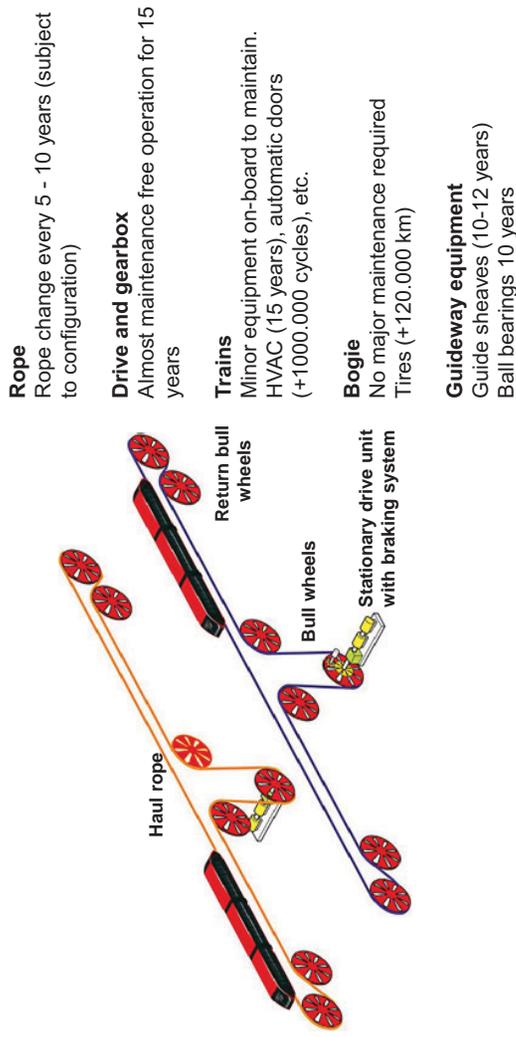
Cable-propulsion trains	Self-propulsion trains
Low loads → light weight guideway Few moving parts → low cost maintenance Passive train → no off-line maintenance depot required	Heavy trains → high load expensive guideway superstructure Active trains with on-board equipment → Requires off-line Maintenance depot (high cost) → Require spare vehicle

## METHODS OF WORK – manufacturing capacity (train control)

### LEITNER-POMA train control



## OPERATION & MAINTENANCE – major maintenance items



Meridian Consultants  
 251-004-21

3.0-75



## REFERENCES



### APM

Duke university Medical Center, USA  
 Harbour Island, Tampa, USA  
 Serfaus, Austria  
 Sun City, South Africa  
 Niarta International Airport, Japan  
 Cincinnati International Airport, USA  
 J. Paul Getty Center, Los Angeles, USA  
 San Raffaele Hospital, Italy

Minneapolis International Airport Garage, USA  
 Detroit Metropolitan Airport, USA  
 Zurich International Airport, Switzerland  
 Minneapolis International Airport Green  
 Concourse, USA  
 Huntsville Hospital, USA  
 Lagoas Parque Cerinas, Portugal  
 Perugia, Italy  
 Cairo Airport, Egypt

Frankfurt, Germany  
 Miami International Airport, USA  
 Pisa, Italy

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 251-004-21

3.0-76



REFERENCES

DATE	LOCATION	COUNTRY
1980	Duke University Medical Center	USA
1985	Harbour Island Tampa	USA
1985	Serfaus	Austria (upgraded in 2019)
1986	Sun City	South Africa
1989	Laon	France
1992	Narita International Airport	Japan
1994	Cincinnati International Airport	USA
1996	J. Paul Getty Center, Los Angeles	USA
1999	San Raffaele Hospital	Italy
2000	Minneapolis Airport Parking Garage	USA
2000	Detroit Metropolitan Airport	USA
2001	Minneapolis Airport Green Concourse	USA



REFERENCES

DATE	LOCATION	COUNTRY
2001	Huntsville Hospital	USA
2003	Zurich International Airport	SWITZELAND
2003	Lagoas Parque Oeiras – 1st phase	PORTUGAL
2008	Perugia	ITALY
2012	Cairo Airport	EGYPT
2012	Sqaire Metro - Frankfurt	GERMANY
2016	Pisa Airport	ITALY
2016	Miami International Airport	USA
2019	Serfaus	AUSTRIA



**COMMENT LETTER NO. 12:**

Frederic Demoulin  
Urban Ropeways Project Manager  
Leitner-Poma of America, Inc.  
2746 Seeber Drive, Building A  
Grand Junction, CO 81506

**Response 12-1:**

Please see page 3.0-15 of **Section 3.0: Project Description** which discusses the suitability of cable-propelled systems for the ITC Project. Cable-propelled technologies are identified as potentially viable for the provided the established Project requirements can be met. In addition, please see page 7 of the Inglewood Transit Connector Operating System Conceptual Planning Report in **Appendix E** of the Recirculated Draft EIR, which states that cable-propelled technologies are potentially viable and not precluded from proposing on the project. Additional information on the urban cable-propelled systems supplied by Leitner-Poma is provided on page 20 of Inglewood Transit Connector Operating System Conceptual Planning Report in **Appendix E**.

**Response 12-2:**

This comment includes questions on the procurement process the City will conduct for the project and raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

December 2, 2021

Mindy Wilcox  
City of Inglewood - Planning Division  
One West Manchester Blvd.  
Inglewood, CA 90301

Re: Inglewood Transit Connector - Recirculated Draft Environmental Impact Report (DEIR)

Dear Ms. Wilcox,

As a co-founder of FASTSIGNS Inglewood/LAX, with employees and clientele from the City of Inglewood and elsewhere in the County of Los Angeles, I write this letter in support of the Inglewood Transit Connector Project and the elevated, electrically powered, automated people mover. As a business owner, I am committed to keeping our business in the City of Inglewood, and as part of that commitment we back the City's plan to alleviate event day traffic congestion with the proposed Project.

13-1

As Inglewood undergoes a historic transformation into a world-class sports and events destination, I believe the ITC Project will contribute significantly to the city's economic growth by encouraging travel to and from the city via the Metro Crenshaw/LAX line and the automated people mover. In addition to the economic development this will bring, I support the City's commitment to investing in a method of transportation that is sustainable and contributes to the overall protection of the environment.

13-2

The Recirculated Draft EIR also maps out the City's Construction Plan, which promises to work with local businesses to keep potential construction interruptions at a minimum. I support the City's creation of a \$5 million dollar Business Interruption Assistance fund to provide financial assistance to small "mom and pop" businesses to help offset to the extent possible, business revenue losses or increased expenses that are directly attributable to disruptions during the ITC construction activities within the ITC Project.

13-3

The ITC Project is designed to provide significant connectivity, traffic reduction, economic prosperity, and quality of life benefits to the City of Inglewood. The City needs to close first/last mile gaps between the soon to open Metro K Line (Crenshaw/LAX Line) and the housing and employment centers, and sports and entertainment venues.

13-4

Thank you for moving forward with this project, and for supporting Inglewood businesses.

Eric Bailles  
Owner of FASTSIGNS Inglewood/LAX  
403 S. La Brea  
Inglewood, CA 90301

**COMMENT LETTER NO. 13:**

Eric Baines, Owner  
FASTSIGNS Inglewood/LAX  
403 South La Brea Avenue  
Inglewood, CA 90301

**Response 13-1:**

This comment supporting the ITC Project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 13-2:**

This comment supporting the City's objectives for the ITC Project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 13-3:**

This comment supporting the Construction Commitment Program, including the Business Assistance Fund included as part of the project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 13-4:**

This comment supporting the ITC Project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

12/27/21, 5:05 AM

ITC Zoom Meeting - inglewoodtransitconnector

## ITC Zoom Meeting

Arthur Dawson <edawsoncorp@gmail.com>

Mon 11/22/2021 4:26 PM

To:inglewoodtransitconnector <inglewoodtransitconnector@cityofinglewood.org>;

Hello Ms. Wilcox,

We own a complex with thirteen tenants at the southeast corner of Market and Manchester and a few questions came to mind during your presentation. 14-1

1. How will this completed project impact our property? 14-2
2. Is there any discussion about a stop at this inter-section and why not go all the way to Century? 14-3
3. How long do you think construction will take? 14-4
4. How will traffic on Manchester be impacted during and after construction? Will we lose a lane? 14-5
5. Is anyone talking about a traffic signal at Osage Ave.? There have been several accidents there. 14-6
6. Will the rail be above the center of the street or on the north or south side of Manchester? 14-7
7. How long do you think it will take to complete? 14-8
8. Are any funds coming from the just approved infrastructure bill passed by Congress? 14-9
9. Lastly, what do you think are the chances that this project gets approved? 14-10

Thank you. I enjoyed your presentation.

**COMMENT LETTER NO. 14:**

Arthur Dawson  
302 East Manchester Boulevard #2  
Inglewood, CA 90301

**Response 14-1:**

This introductory comment has been noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 14-2:**

The ITC Project will have no direct impact on the property located at 302 E Manchester Boulevard. Air Quality, Noise, and other analyses in the Recirculated Draft EIR determined there will be no significant impacts after mitigation. There are measures identified in Construction Commitment Program (CCP) to proactively address the potential effects of the construction of the Project on the community. This Program addresses business and community support plans, construction staging and traffic control requirements, maintenance of access to parking, businesses, residences, and pedestrian facilities, noise and vibration measures, air quality measures, and other vital measures during construction.

**Response 14-3:**

As discussed in **Section 3.0: Project Description** in the Recirculated Draft EIR the ITC Project is proposed to meet the Project objectives described on pages 3.0-10–3.0-11, which include closing the last mile gap to regional transit systems by connecting the Metro K Line to the activity centers in the LASED including SoFi Stadium, the commercial uses at Hollywood Park, the IBEC as well as existing and future local businesses and residences. The system does not need to extend to Century Boulevard to meet these objectives.

**Response 14-4:**

As described on page 3.0-82 of **Section 3.0: Project Description** of the Recirculated Draft EIR, construction of the ITC Project would take approximately 46 months.

**Response 14-5:**

As described in **Section 3.0: Project Description** and **Section 4.12: Transportation** of the Recirculated DEIR, the CCP addresses temporary transportation impacts during construction such as construction staging and

traffic control requirements and maintenance of access to parking, businesses, residences, and pedestrian facilities. As described on page 3.0-64 of **Section 3.0** and on page 47 of **Appendix O: Transportation Assessment Study**, there will be no changes to the lane configurations or traffic control due to the ITC Project at Market Street/Manchester Boulevard signalized intersection compared to existing conditions. The northbound and southbound approaches will provide a left-turn lane and a shared through/right-turn lane. The eastbound and westbound approaches will both provide a left-turn lane, one through lane and a shared through/right-turn lane. One of the Project's objectives is to maintain existing roadway capacity to the extent feasible, as described on page 3.0-10 of **Section 3.0**.

**Response 14-6:**

This comment is noted. As described on page 48 of **Appendix O**, there will be no changes to the existing stop-signs at Osage Avenue from the Project.

**Response 14-7:**

As described on page 3.0-32 of **Section 3.0: Project Description**, single column supports for the ATS guideway will be located in the median of Manchester Boulevard that will not restrict existing traffic capacity or turning movements at intersections. As described previously in Response 14-5, one of the Project's objectives is to maintain existing roadway capacity to the extent feasible, as described on page 3.0-10 of **Section 3.0**.

**Response 14-8:**

As described on page 3.0-82 of **Section 3.0: Project Description** of the Recirculated Draft EIR, construction of the ITC Project would take approximately 46 months.

**Response 14-9:**

This comment addressing funding from a recently approved Infrastructure Investment and Jobs Act. Funding specific to the referenced Act has not been decided as this time. The City intends to apply for available federal funding.

**Response 14-10:**

The Project will be considered for approval by the City Council in February 2022. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

3.0 Comments and Responses  
Comment Letter No. 15

3.0 Comments and Responses



SOUTH BAY WORKFORCE INVESTMENT BOARD  
www.sbwib.org

December 14, 2021

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DONALD FORD  
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GREGG MCCLAIN  
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JOE AHN  
JOSH LAFARGA  
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KEN GOMEZ  
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MARC WEISS  
MARIA CAMACHO  
MICHAEL BRENK  
MIKE COSTIGAN  
MIKE HARRIEL  
MITCH PONCE  
MOHAMMAD NASER  
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RUTH DAVIS  
SANJAY MURTY  
SARAH GONZAGA  
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TAMI LORENZEN-FANSELOW  
TED CORDOVA  
TOD SWORD  
TOM BAKALY  
TONYA GRIFFIN  
WALTER AHMATTY  
WAYNE DIULIO

Mindy Wilcox  
Planning Division  
City of Inglewood  
One West Manchester Blvd.  
Inglewood, CA 90301

Re: Recirculated Draft Environmental Impact Report (EIR) on the Inglewood Transit Connector (ITC)

Dear Ms. Wilcox,

As a member of the Inglewood Airport Area Chamber of Commerce and Executive Director of the South Bay Workforce Investment Board (SBWIB), with employees and clientele from the City of Inglewood and elsewhere in the County of Los Angeles, I write this letter in support of the Inglewood Transit Connector Project and the elevated, electrically powered, automated people mover. I am committed to ensuring that Inglewood residents and those throughout the South Bay region who may visit the City for employment, retail or entertainment purposes are able to enjoy the full benefits of the City, and as part of that commitment we back the City's plan to alleviate event day traffic congestion with the proposed Project. 15-1

As Inglewood undergoes a historic transformation into a world-class sports and events destination, I believe the ITC Project will contribute significantly to the city's economic growth by encouraging travel to and from the city via the Metro Crenshaw/LAX line and the automated people mover. In addition to the economic development this will bring, I support the City's commitment to investing in a method of transportation that is sustainable, and contributes to the overall protection of the environment. The Recirculated Draft EIR also maps out the City's Construction Plan, which promises to work with local businesses to keep potential construction interruptions at a minimum. 15-2

I support the efforts of the Business Interruption Assistance Program that the City will create a \$5-million-dollar Business Interruption fund to provide financial assistance to small "mom and pop" businesses to help offset to the extent possible, business revenue losses or increased expenses that are directly attributable to disruptions during the ITC construction activities within the ITC Project. 15-3

In anticipation of the Governor releasing the new State Budget and the upcoming deliberations by the Legislature, I express my strong support for the City of Inglewood's pursuit of \$400 million for the ITC Project from the forthcoming State budget. 15-4

The ITC Project is designed to provide significant connectivity, traffic reduction, economic prosperity, and quality of life benefits to the City of Inglewood. The City needs to close first/last mile gap between Metro K Line (Crenshaw/LAX Line) and the housing and employment centers, and sports and entertainment venues. 15-5

Thank you for moving forward with this project, and for supporting Inglewood businesses.

Sincerely,  
  
Jan Vogel  
Executive Director

Hawthorne • Hermosa Beach • Gardena • Inglewood • Lawndale • Redondo Beach • Manhattan Beach • Carson • El Segundo • Torrance • Lomita  
11539 Hawthorne Boulevard., 5th Floor, Suite 500, Hawthorne, CA 90250 / Phone: 310.970.7700 / Fax: 310.970.7711

COMMENT LETTER NO. 15:

Jan Vogel, Executive Director  
South Bay Workforce Investment Board  
11539 Hawthorne Boulevard, 5<sup>th</sup> Floor, Suite 500  
Hawthorne, CA 90250

Response 15-1:

This comment supporting the ITC Project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

Response 15-2:

This comment supporting the City's objectives for the ITC Project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

Response 15-3:

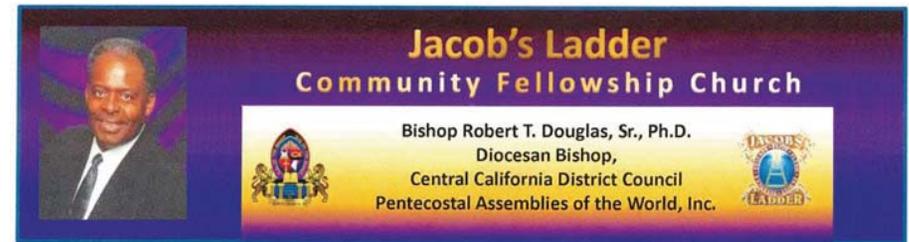
This comment supporting the Business Assistance Fund included in the Construction Commitment Program is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

Response 15-4:

This comment supporting the City pursuing available state funding for the project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

Response 15-5:

This comment supporting the ITC Project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.



Jacob's Ladder  
Official Board of Directors

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Chairman/CEO

Dr. Paulette Douglas  
Vice Chairman

Dr. Lois Le Blanc  
Treasurer/Chief Financial Officer

Dr. Jennifer Payne  
Corporate Secretary

Minister Christopher Nalls  
Member

Deacon Bobby Smith  
Member

December 14, 2021

Mindy Wilcox  
Planning Division  
City of Inglewood  
One West Manchester Blvd.  
Inglewood, CA 90301

Re: Recirculated Draft Environmental Impact Report (EIR) on the Inglewood Transit Connector (ITC)

Dear Ms. Wilcox,

I write today to express my strong support for the Inglewood Transit Connector (ITC) project and Automated People Mover.

The members of our church and the many churches and congregations we serve are committed to a brighter future for their families and the broader community, and the Inglewood Transit Connector helps support that commitment by adding a much-needed connection between the Metro Crenshaw/LAX line and our new sports centers along the Prairie corridor.

As the City undergoes a game-changing transformation, we believe the ITC Project and the elevated, electrically powered automated people mover, will help alleviate the anticipated increase in visitors and vehicles to and from Downtown Inglewood/Market Street The Forum, SoFi Stadium, Hollywood Park, and future Intuit Dome. The ITC Project is designed to provide significant connectivity, traffic reduction, economic prosperity, and quality of life benefits to the City of Inglewood. The City needs to close first/last mile gap between Metro K Line (Crenshaw/LAX Line) and the housing and employment centers, and sports and entertainment venues

We fully support the City's commitment to investing in new methods of transportation that are sustainable, improve air quality, reduce greenhouse gas emissions, and contribute to the overall health and well-being of Inglewood residents as indicated in the Recirculated Draft EIR. Thank you for moving forward with this project, and for supporting the growth and prosperity of our city.

Sincerely,

Bishop Robert Douglas, Jr.  
Director, Inglewood Are a Ministers Association

**COMMENT LETTER NO. 16:**

Bishop Robert Douglas, Jr., Director  
Inglewood Area Ministers Association  
1152 East Hyde Park Boulevard  
Inglewood, CA 90302

**Response 16-1:**

This comment supporting the ITC Project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 16-2:**

This comment supporting the City's objectives for the ITC Project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 16-3:**

This comment supporting the ITC Project and recognizing the benefits of the project as proposed is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 16-4:**

This comment supporting the ITC Project and recognizing the environmental benefits of the project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

December 1, 2021

Mindy Wilcox  
Planning Division  
City of Inglewood  
One West Manchester Blvd.  
Inglewood, CA 90301

Re: Recirculated Draft Environmental Impact Report (EIR)  
on the Inglewood Transit Connector (ITC)

Dear Ms. Wilcox,

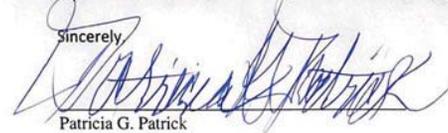
As a resident of Inglewood, I write this letter in support of the City of Inglewood's proposed Inglewood Transit Connector Project (ITC) and Automated People Mover. 17-1

As the City undergoes a game-changing transformation into a busy sports and entertainment district, I believe the ITC Project, which would bring an electrically powered automated people mover to the City of Inglewood, will help usher in a range of opportunities and growth for the region. This will help alleviate the anticipated increase in visitors and vehicles to and from Downtown Inglewood/Market Street, The Forum, SoFi Stadium, Hollywood Park, and future Intuit Dome. The ITC Project is designed to provide significant connectivity, traffic reduction, economic prosperity, and quality of life benefits to the City of Inglewood. The City needs to close first/last mile gap between Metro K Line (Crenshaw/LAX Line) and the housing and employment centers, and sports and entertainment venues. 17-2

In anticipation of the Governor releasing the new State Budget and the upcoming deliberations by the Legislature, I express my strong support for the City of Inglewood's pursuit of \$400 million for the ITC Project from the forthcoming State budget. 17-3

I applaud the City's commitment to investing in modern methods of transportation that are sustainable and contribute to the overall health and well-being of residents like me – as indicated in the Recirculated Draft EIR. Thank you for moving forward with this project, and for supporting the growth and success of the City of Inglewood. 17-4

Sincerely,



Patricia G. Patrick

**COMMENT LETTER NO. 17:**

Patricia Patrick  
Inglewood, CA

**Response 17-1:**

This comment supporting the ITC Project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 17-2:**

This comment supporting the City's objectives for the ITC Project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 17-3:**

This comment supporting the City pursuing available state funding for the ITC Project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 17-4:**

This comment supporting the ITC Project and recognizing the environmental benefits of the project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

December 13, 2021

Mindy Wilcox  
Planning Division  
City of Inglewood  
One West Manchester Blvd.  
Inglewood, CA 90301

Re: Recirculated Draft Environmental Impact Report (EIR) on the Inglewood Transit Connector (ITC)

Dear Ms. Wilcox,

As a resident of Inglewood, I write this letter in support of the City of Inglewood's proposed Inglewood Transit Connector Project (ITC) and Automated People Mover.

18-1

As the City undergoes a game-changing transformation into a busy sports and entertainment district, I believe the ITC Project, which would bring an electrically powered automated people mover to the City of Inglewood, will help usher in a range of opportunities and growth for the region. This will help alleviate the anticipated increase in visitors and vehicles to and from Downtown Inglewood/Market Street, The Forum, SoFi Stadium, Hollywood Park, and future Intuit Dome. The ITC Project is designed to provide significant connectivity, traffic reduction, economic prosperity, and quality of life benefits to the City of Inglewood. The City needs to close first/last mile gap between Metro K Line (Crenshaw/LAX Line) and the housing and employment centers, and sports and entertainment venues.

18-2

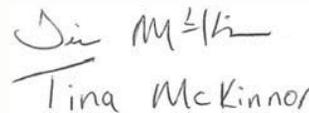
In anticipation of the Governor releasing the new State Budget and the upcoming deliberations by the Legislature, I express my strong support for the City of Inglewood's pursuit of \$400 million for the ITC Project from the forthcoming State budget.

18-3

I applaud the City's commitment to investing in modern methods of transportation that are sustainable and contribute to the overall health and well-being of residents like me – as indicated in the Recirculated Draft EIR. Thank you for moving forward with this project, and for supporting the growth and success of the city.

18-4

Sincerely,



3.0 Comments and Responses

COMMENT LETTER NO. 18:

Tina McKinnor  
Inglewood, CA

Response 18-1:

This comment supporting the ITC Project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

Response 18-2:

This comment supporting the City's Objectives for the ITC Project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

Response 18-3:

This comment supporting the City pursuing available state funding for the ITC Project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

Response 18-4:

This comment supporting the ITC Project and recognizing the environmental benefits of the project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.



December 27, 2021

Mindy Wilcox, AICP  
Planning Manager  
Planning Division  
City of Inglewood  
One West Manchester Blvd. 4th Floor  
Inglewood, CA 90301

Re: Inglewood Transit Connector (ITC) Recirculated EIR

Dear Ms. Wilcox,

I write on behalf of The Forum, a world-class concert venue located at 3900 W Manchester Boulevard, in connection with the City of Inglewood's recirculated Draft Environmental Impact Report (EIR) for the ITC project. The transit connector is an important project that will provide a critical connection between the LA Metro system and Inglewood's entertainment district. The Forum very much appreciates the changes to the project as delineated in the EIR. It is clear that the new station location at Manchester and Prairie, and the revised westside alignment of the guideway, improves the design of the system and reduces impacts to The Forum's access, circulation and property.

19-1

We nonetheless note that the project is described in the EIR as having "no more than three straddle bent columns for a switch zone located immediately south of Nutwood Street. These three straddle bents would span Prairie Avenue, and potentially require acquisition of private property from the Forum." We are hopeful that the number of straddle bents ultimately required can be reduced, as they are intrusive and have a negative impact on the parking supply and circulation for the Forum. We also want to closely collaborate with the City on coordination of construction activities, as well as pedestrian access.

19-2

We applaud the City's modification to the ITC project. The increased mobility from the ITC will have an immediate and significant impact on the community, alleviating congestion and connecting residents with jobs, educational opportunities, and entertainment. This type of smart infrastructure investment enhances the quality of life for residents, and allows the city to build on its successes by attracting new private sector investment to the region. We look forward to working with the City to continue to reduce project impacts and bring this exciting project to fruition.

19-3

Sincerely,

Digitally signed by

General Manager & Senior Vice President  
Forum Entertainment LLC

**COMMENT LETTER NO. 19:**

Geni Lincoln, General Manager & Senior Vice President  
Forum Entertainment LLC  
3900 Manchester Boulevard  
Inglewood, CA 90305

**Response 19-1:**

This introductory comment supporting the revised design for ITC Project as described in the Recirculated Draft EIR is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 19-2:**

This comment addressing the potential location of up to three straddle bent columns on the Forum property is noted. During the final design process for the Project, the City will work to minimize the number of straddle bents required on the Forum property.

**Response 19-3:**

This comment supporting the City's revised design for the ITC Project and recognizing the benefits of the project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.



523 West Sixth Street, Suite 826  
Los Angeles, CA 90014  
213 623 2489 OFFICE  
213 623 3909 FAX  
laconservancy.org

January 11, 2022

**Sent Electronically**

Mindy Wilcox, Planning Manager  
City of Inglewood  
One West Manchester Boulevard, 4<sup>th</sup> Floor  
Inglewood, CA 90301  
Email: [inglewoodtransitconnector@cityofinglewood.org](mailto:inglewoodtransitconnector@cityofinglewood.org)

**RE: Inglewood Transit Connector Project, Recirculated Draft Environmental Impact Report**

Dear Ms. Wilcox:

On behalf of the Los Angeles Conservancy, I am writing to comment on the Inglewood Transit Connector Project and its Recirculated Draft Environmental Impact Report (Draft EIR). This is follow-up to our previous comments submitted on February 8, 2021.

20-1

The recirculated DEIR addresses some of our previously raised questions and comments, and reflects substantial modifications to the project scope. The Conservancy greatly appreciates consideration of our comments as we provide them with the intent of improving and making this proposed project better. We thank the City of Inglewood for including us in conversations regarding the proposed project's impacts to historic resources.

20-2

The Conservancy is not opposed to the basis for the proposed project or an APM, as a means to increase transportation efficiencies and access. Our concerns have centered on potential adverse impacts to historic resources due to this proposed undertaking, specifically those in the historic downtown portions of Inglewood along Market Street. We appreciate the sensitivity to listening to our concerns and attempts to offset potential harm, namely through a proposed design review process, design guidelines, and securing funding to help with future downtown revitalization efforts. This includes streetscape, façade improvements, and specific financial assistance to help rehabilitate the long-shuttered historic Fox Theatre.

20-3

The Fox Theatre, a National Register listed property, has been cited as having significant direct impacts caused by interrupted view sheds as a

20-4



3.0 Comments and Responses  
Comment Letter No. 20

result of the construction of the APM. This is a highly significant historic resource, built in the late '40s and designed by theatre architect S. Charles Lee. Improvements to the alignment and height of the APM have reduced impacts to this theatre, which we greatly appreciate.

As this proposed project moves forward, much attention will need to remain focused on Market Street to ensure the APM actually helps and reinforces the vitality of downtown Market Street corridor. We urge the City to not lose focus, and continue seeking funding and support for this initiative as downtown is poised for an economic revitalization and can continue to serve as the heart of the community. We look forward to seeing Market Street reactivated with programming and pedestrian amenities, and urge the City to continue to revitalize this important commercial corridor.

The Conservancy has no additional comments regarding the recirculated DEIR and the proposed project.

**About the Los Angeles Conservancy:**

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Please do not hesitate to contact me at (213) 430-4203 or [afine@laconservancy.org](mailto:afine@laconservancy.org) should you have any questions or concerns.

Sincerely,



Adrian Scott Fine  
Senior Director of Advocacy



3.0 Comments and Responses

**COMMENT LETTER NO. 20:**

Adrian Scott Fine, Senior Director of Advocacy  
Los Angeles Conservancy  
523 West Sixth Street, Suite 826  
Los Angeles, CA 90014

**Response 20-1:**

This introductory comment contains a description of the contents of this letter. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 20-2:**

This comment expressing appreciation for the City consulting with the LA Conservancy and revising the design of the project to address comments on the project as originally proposed is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 20-3:**

This comment expressing appreciation for the City addressing the concerns of the LA Conservancy regarding the potential for the project to affect historic resources is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 20-4:**

This comment acknowledging that the revised design as described in the Recirculated Draft EIR reduces the potential for the project to impact the Fox Theater, a historic resource, is noted. With implementation of Project Design Feature (PDF) CUL-1, the Project will have a less than significant impact on the Fox Theater. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines



3.0 Comments and Responses

section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 20-5:**

This comment requesting that the City continue to focus on the revitalization of Market Street is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

**Response 20-6:**

It is noted that the Los Angeles Conservancy has no additional comments on the Recirculated Draft EIR and proposed project.

3.0 Comments and Responses  
Comment Letter No. 21

February 8, 2022

Mindy Wilcox  
Planning Division  
City of Inglewood  
One West Manchester Blvd.  
Inglewood, CA 90301

Re: Support for Westside Alignment of the Inglewood Transit Connector (ITC)

Dear Ms. Wilcox,

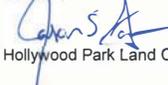
On behalf of Hollywood Park Land Company, LLC, I write in support of the western alignment of the Inglewood Transit Connector (ITC) as described in the City of Inglewood's recirculated Draft Environmental Impact Report (EIR) for the project, and we also support the City's efforts to pursue additional funding from the Governor's new State Budget. We appreciate the City's willingness to listen to multiple stakeholders and strive to make the ITC the best possible project. As revised and described in the EIR, the westside alignment reduces the impacts of the project, while enhancing the mobility. This much-needed investment in our infrastructure will significantly benefit the entire Inglewood community.

The ITC project is a 1.6 mile fully elevated, electronically powered automated transit system, which will provide a safe and reliable connection from the planned Metro improvements to Inglewood's most popular destinations, including the SoFi Stadium, the Forum, and the Intuit Dome. Having spent many years working to build relationships and trust within the Inglewood community, I understand that traffic congestion is a top concern for many local residents and business owners. By taking thousands of cars off the road every year, the ITC will not only cut down on traffic, it will significantly reduce smog and pollution in the area.

This project will also help to realize the City's goals of bringing meaningful employment opportunities to local Inglewood residents. The ITC project will bring hundreds of good-paying jobs to Inglewood, helping to ensure the City will remain prosperous for many years to come. This type of smart infrastructure investment enhances the quality of life for residents, and allows the city to build on its successes by attracting new private sector investment to the region.

The City of Inglewood has an impressive track record when it comes to bringing transformative and innovative ideas to fruition. The ITC is no exception. There is still much work to do, and details to work out. But we look forward to working with the City to make the western alignment of the ITC a reality.

Sincerely,

  
Hollywood Park Land Company, LLC

21-1

**COMMENT LETTER NO. 21:**

Jason Gannon, Managing Director at SoFi Stadium  
1001 Stadium Drive  
Inglewood, CA 90301

**Response 21-1:**

This comment supporting the ITC Project is noted. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Recirculated Draft EIR that require response pursuant to CEQA Guidelines section 15088. This comment is included as a part of the record and is available to the decision makers for their consideration prior to consideration of approval of the Proposed Project.

## 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

### 4.1 INTRODUCTION

Public Resources Code section 21081.6 and section 15097 of the California Environmental Quality Act (CEQA) Guidelines require public agencies to establish monitoring or reporting programs for projects approved by a public agency whenever approval involves the adoption of either a mitigated negative declaration or specified environmental findings related to environmental impact reports.

This is the Mitigation Monitoring and Reporting Program (MMRP) for the Inglewood Transit Connector (ITC, or Project). The intent of the MMRP is to ensure the successful implementation of the mitigation measures identified in the Final Environmental Impact Report (Final EIR) for the Project.

### 4.2 MITIGATION MEASURES

The mitigation measures from the Final EIR are assigned the same title as in the Final EIR. The MMRP describes the actions to be taken to implement each mitigation measure, the timing of these actions, the entities responsible for implementing and monitoring the actions, and, where appropriate, the entities responsible for ensuring that reporting responsibilities are carried out. The mitigation measures identify the Project as the "Proposed Project"; this same terminology is used here in order to ensure that the measures in this MMRP are consistent with those identified in the Final EIR.

In some instances, mitigation measures require a monitor or community liaison to be retained or designated. In those instances, the person or entity designated to perform this task shall be identified to the City, and the City will review that person or entity's qualifications to confirm that the designated party has the requisite expertise or qualifications.

The MMRP also includes a table identifying "Project Design Features" (PDFs). This information is included for convenience and comprehensiveness. These PDFs are not "mitigation measures" as defined by CEQA. PDFs consist of elements or features that have been incorporated into the Project that may reduce the environmental effects of the Project. These PDFs are included in a separate table in order to ensure that these features are implemented.

### 4.3 MMRP COMPONENTS

The components of the attached tables, which contain applicable mitigation measures and project design features, are addressed briefly, below:

- **Impact:** This column summarizes the impact stated in the Draft EIR, as revised in the Final EIR.

4.0 Mitigation Monitoring and Reporting Program

- **Mitigation Measure:** All mitigation measures identified in the Draft EIR, as revised in the Final EIR, are presented and titled accordingly.
- **Implementing Party:** The column entitled “Implementing Party” identifies the entity that will undertake the required action. The Implementing Party is most often the Contractor/Operator, who will be responsible for the design, construction or operation of each site, phase, or component of the Project. The Contractor/Operator responsible for undertaking a required action may include the owner or operator of the Project component, as appropriate. In some instances, the required action will or should be undertaken by another party. This column therefore provides clarity regarding the entity that is primarily responsible for carrying out the action.
- **Monitoring Party:** This column identifies the specific party responsible for monitoring. The City of Inglewood (the City) is primarily responsible for monitoring that mitigation measures are successfully implemented. Within the City, the Public Works Department would have responsibility for monitoring some aspect of the overall project. The City of Inglewood proposed the formation of a joint powers authority (JPA) with the Los Angeles County Metropolitan Transportation Authority (Metro) to implement and operate the ITC Project. In March 2021, Metro’s Board approved and voted to form the JPA. Upon formation, the JPA would assume responsibility for oversight of the Project. Therefore, although the JPA does not yet exist, it has been added as a Monitoring Party where the JPA would have that role once the JPA is constituted. Other entities, such as the DBFOM Contractor, or other agencies, such as the Los Angeles Regional Water Quality Control Board, may also be responsible for monitoring the implementation of mitigation measures.  
  
The department within the City who is identified as a monitoring party includes the: (1) the Public Works Department, which helps to plan, design, inspect, and administer contracts for capital infrastructure construction and facility improvements projects (Engineering Division); manage the City’s municipal solid waste services (Environmental Services Division); and assures that City transportation improvements and systems are functional and safe (Transportation & Traffic Division).
- **Timing:** Implementation of the action must occur prior to or during some part of project approval, project design or construction, or during ongoing project operations. The timing for each measure is identified in this column.
- **Notes:** Certain measures identify reporting responsibility. In those instances, the MMRP identifies the party that must prepare a report so that the monitoring party can confirm that the required action(s) have been implemented. This column also notes where the mitigation measure will be enforced in part by another agency or provides additional information that provide clarity concerning how the measure will be carried out.
- **Acronyms:** The MMRP uses various acronyms to refer to various City Departments or other agencies or entities. In some instances, the full name of the department or agency is used. The following agency or department acronyms are used throughout the MMRP:

4.0 Mitigation Monitoring and Reporting Program

Name of Department or Agency	Acronym
<i>City of Inglewood, Public Works Department</i>	
Engineering Division	DPW-Engineering Division
Environmental Services Division	DPW-Environmental Services Division
Transportation & Traffic Division	DPW-Transportation & Traffic Division
<i>South Coast Air Quality Management District</i>	<i>SCAQMD</i>
<i>State of California, Department of Transportation</i>	<i>Caltrans</i>
<b>Other acronyms:</b>	
ATS	Automated Transit System
CCP	Construction Commitment Plan
JPA	Joint Powers Authority
PDF	Project Design Feature

4.0 Mitigation Monitoring and Reporting Program

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
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4.2 Air Quality

**Impact AQ-1:** Conflict with or obstruct implementation of the applicable air quality plan.

See **PDF AQ-1** in Project Design Features table below.

See **PDF AQ-1** in Project Design Features table below.

JPA/DPW  
Contractor/  
Operator

**Impact AQ-2:** Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.

**Impact AQ-3:** Expose sensitive receptors to substantial pollutant concentrations.

4.3 Biology Resources

**Impact BIO-1:** Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

**BIO-1 Conservation of Faunal Resources: Nesting Birds/Raptors:** 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 (6) months until the completion of construction activities, as specified below.

Nesting bird survey shall include:

Contractor/  
Operator

JPA/DPW

Prior to tree removal activities that would occur between January 1 through September 1 for raptors and March 1 to September 15 for nesting birds, preconstruction surveys would be conducted by a qualified biologist no earlier than 30 days prior to the commencement of

Measure applies for tree removal activities occurring between January 1 through September 1 for raptors and March 1 to September 15 for nesting birds. Biologist retained by Contractor/Operator subject to review and approval by City to confirm that biologist is qualified to perform survey.

4.0 Mitigation Monitoring and Reporting Program

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
--------	---------------------	--------------------	------------------	--------	-------

– Prior to any demolition and/or construction, and a least every six (6) 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 no more than 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.

construction activities. If active nests are found during preconstruction surveys, the qualified biologist shall utilize the appropriate buffer (300 feet for nesting birds and 500 feet for raptors) to avoid the nest and the City shall be notified. The requirement to establish a buffer applies if active nests or raptors are found during construction.

Biologist to prepare report of pre-construction survey, and to submit report to ECDD-Planning Division. Biologist shall notify ECDD-Planning Division if active nests are found.

– Prior to any vegetation disturbance between March 1 and September 15, and a least every six (6) 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 demolitions areas and within 300 feet of all disturbance areas. 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

4.0 Mitigation Monitoring and Reporting Program

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>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 areas) to the City and, upon request, the 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.</p> <p>-</p> <p>During the year prior to demolition and/or construction, a survey shall be conducted by a qualified biologist for bat habitat areas within the construction footprint of the proposed Project between March 1</p>	4.0-6			

Meridian Consultants  
251-004-20

Inglewood Transit Connector Project  
February 2022

4.0 Mitigation Monitoring and Reporting Program

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>and September 30 and at least every six (6) months until the completion of construction activities. The areas shall be characterized as to their potential for supporting a bat maternal colony or nursery site. The survey shall include all trees and any manmade structures, or other bat habitat areas that could be affected. If bat maternal colony or nursery sites are identified, then these areas shall be avoided by demolition and/or construction during the bat breeding season, from March 1 through September 30. Each tree or structure supporting an active maternity roost shall be inspected a week prior to disturbance to determine the presence or absence of roosting bats.</p> <ul style="list-style-type: none"> <li>The biologist shall submit weekly reports to the City's Parks, Recreation and Library Services Director, or designated representative, regarding the results of the nesting bird surveys.</li> </ul>	See MM TCR-1 to MM TCR-4.	JPA and see MM TCR-1 to MM TCR-4.	See MM TCR-1 to MM TCR-4.	See MM TCR-1 to MM TCR-4.
<b>4.4 Cultural Resources</b>	<p><b>Impact CUL-2:</b> Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?</p> <p><b>Impact CUL-3:</b> Disturb any human remains, including those interred outside of</p>	See MM TCR-1, MM TCR-3, MM TCR-5.	JPA and see MM TCR-1, MM TCR-5, MM TCR-3,	See MM TCR-1 to MM TCR-5.	See MM TCR-1, MM TCR-3, MM TCR-5.

Meridian Consultants  
251-004-20

Inglewood Transit Connector Project  
February 2022

4.0 Mitigation Monitoring and Reporting Program

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
formal cemeteries.		TCR-5.	MM TCR-5.		
<b>4.6 Geology</b>					
<p><b>Impact GEO-1:</b> Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42.</p>	<p><b>MM GEO-1:</b> The proposed Project shall be designed to accommodate fault rupture where present in accordance with applicable Caltrans guidelines, including Memo to Designers 20-8 (Analysis of Ordinary Bridges that Cross Faults), dated January 2013; and Memo to Designers 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.</p> <p>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. As noted in Caltrans Memorandum to Designers (MTD) 20-8, bridge type structures, such as the ATS Guideway, must be designed for the displacement demand resulting from a static fault offset, the dynamic response due to ground shaking, and any other fault-induced hazards (e.g., creep) that may occur at the site. Caltrans MTD 20-8 provides a method for obtaining the displacements at columns and abutments at fault crossings; all the requirements must also be followed. Adequate bearing seats</p>	Contractor/ Operator	JPA/DPW	ATS system facilities designed in accordance with applicable Caltrans guidelines shall be shown on building plans for the ATS, prior to the issuance of building permits for the ATS.	
<p><i>Meridian Consultants</i> 251-004-20</p>		4.0-8			
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Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>must be provided so the superstructure can slide at the abutment, bent, or hinge seats without falling.</p>	Contractor/ Operator	JPA/DPW		Necessary column placements and ATS facility design would be adjusted on an as-needed basis based on supplemental fault investigation results.
	<p><b>MM GEO-2:</b> During site investigation 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 in the Project area to support adjustments to the proposed Project's design.</p> <p>The investigation shall include a supplemental fault investigation conducted along the trace of the Townsite fault to further refine the location of the feature and assess the activity level where it crosses the proposed ATS alignment and any stations.</p> <p>The investigation shall include the following surface and subsurface methods:</p> <ul style="list-style-type: none"> <li>• Aerial photograph analysis;</li> <li>• Geophysical surveys (e.g., seismic reflection and/or seismic refraction) to refine the identified geophysical anomaly associated with the Townsite fault and inform subsequent targeted fault hazard exploration as necessary;</li> <li>• Targeted fault trenching based on the findings of additional geophysical studies to locate the potential Townsite fault where it crosses the proposed ITC alignment; and</li> <li>• Exploratory drilling and sampling (e.g., hollow stem auger and CPT borings), as</li> </ul>	Contractor/ Operator	JPA/DPW	A supplemental fault investigation will be prepared prior to the issuance of any permit by the City for ground-disturbing activity for each site or phase of the Project, as applicable.	ATS system facilities designed in accordance with applicable Caltrans guidelines shall be shown on building plans for the ATS, prior to the issuance of building permits for the ATS.
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	<p>necessary, if definitive information regarding the trace of the Townsite fault cannot be adequately delineated across the proposed ITC alignment within the limits of fault trenching.</p> <p>Based on the results of these investigations, column placements and facility designs would be adjusted to accommodate geologic conditions identified. Further, the 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). Stations/structures shall be located to avoid the fault rupture hazard where present.</p> <p>Columns and foundations for the guideway and stations, as well as any other ATS facilities shall be located to avoid the fault rupture hazard where present. The design fault offset where evaluating features crossing the ATS guideway alignment shall be determined as the larger of the:</p> <ul style="list-style-type: none"> <li>• Deterministically derived average displacement.</li> <li>• Probabilistically derived displacement consistent with a 5 percent in 50-years probability of exceedance.</li> </ul> <p>Probabilistic procedures shall follow those outlined in Abrahamson [2008] and Petersen et al., [2011] of the <i>Fault Rupture Hazard Evaluation (Appendix K.1)</i>. These procedures allow for evaluation of offset based on the results of field investigation, if further study</p>	4.0-10			

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Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>of the fault rupture is conducted, then procedures as outlined in CGS Note 49<sup>1</sup> shall be followed.</p> <p><b>MM GEO-3:</b> 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 <i>Development of Seismic Design Criteria in Support of Draft EIR - Seismic Design Criteria (Appendix K.2)</i> shall be considered applicable for both aerial guideway and ancillary structures within each segment of the alignment under the guideway and each station.</p> <p>Probabilistic procedures also shall follow those outlined Caltrans memo to Designers 20-10 – Fault Rupture, dated January 2013.</p>	Contractor/ Operator	JPA/DPW	ATS system facilities designed in accordance with applicable Caltrans guidelines shall be shown on building plans for the ATS, prior to the issuance of building permits for the ATS	
<p><b>Impact GEO-3:</b> Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</p>	<p><b>MM GEO-4:</b> A qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (SVP, 2010) shall be retained by the Contractor/Operator and approved by the City prior to the approval of grading permits. The qualified paleontologist shall:</p> <ol style="list-style-type: none"> <li>Prepare, design, and implement a monitoring and mitigation program for</li> </ol>	Contractor/ Operator	JPA/DPW	<ol style="list-style-type: none"> <li>A monitoring and mitigation plan shall be prepared and approved prior to issuance of any permits for ground-disturbing</li> </ol>	<ol style="list-style-type: none"> <li>ECDD-Building Safety Division to review and approve designated paleontologist to confirm that designee has</li> </ol>

1 California Geological Survey, Note 49: Guidelines for Evaluating the Hazard of Surface Fault Rupture, <https://www.conservation.ca.gov/sgs/Documents/Publications/CGS-Notes/CGS-Note-49.pdf>

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	<p>the Project consistent with Society of Vertebrate Paleontology Guidelines. The Plan 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 fossil remains can be salvaged in a timely manner), fossil treatment, procurement, and reporting. The Plan monitoring and mitigation program shall be prepared and approved by the City prior to the issuance of the first grading permit. If the qualified paleontologist determines that the Project-related grading and excavation activity would not affect Older Quaternary Alluvium, then no further mitigation is required.</p> <p>b) Conduct construction worker paleontological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.) and would present the Plan as outlined in (a). In the event construction crews are phased or rotated, additional training shall be conducted for new construction personnel working on ground-disturbing activities. The training session shall provide instruction on the recognition of the types of paleontological resources that could be encountered within the</p>	4.0-12		<p>activity by the City for each site or phase of the Project, as applicable.</p> <p>b) The monitoring and mitigation plan shall be implemented for the duration of Project construction.</p> <p>Paleontological resources sensitivity training shall be conducted prior to the start of ground disturbing activities; additional training shall be conducted for new construction personnel during construction, as needed.</p> <p>c) Paleontological resources monitoring shall be conducted during grading, pursuant to the</p>	<p>appropriate qualifications. MMP to be submitted and approved by ECDD-Building Safety Division to confirm that requirements of Mitigation Measure GEO-4(a) have been met</p> <p>b) Paleontologist to retain documentation that construction personnel have attended training; documentation to be made available to ECDD-Building Safety Division upon request</p>

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	<p>Project area and the procedures to be followed if they are found. Documentation shall be retained by the qualified paleontologist demonstrating that the appropriate construction personnel attended the training.</p> <p>c) Direct the performance of paleontological resources monitoring by a qualified paleontological monitor (meeting the standards of the SVP, 2010). Paleontological resources monitoring shall be conducted pursuant to the monitoring and mitigation program developed under (a). Monitoring activities may be altered or ceased if determined adequate by the qualified paleontologist. Monitors shall have the authority to and shall temporarily halt or divert work away from exposed fossils or potential fossils and establish a 50-foot radius temporarily halting work around the find. Monitors shall prepare daily logs detailing the types of ground disturbing activities and soils observed, and any discoveries.</p> <p>d) If fossils are encountered, determine their significance, and, if significant, supervise their collection for curation. Any fossils collected during Project-related excavations, and determined to be significant by the qualified paleontologist, shall be prepared to the point of identification and curated into an accredited repository with retrievable storage.</p>	4.0-13		<p>monitoring and mitigation program and as directed by qualified paleontologist.</p> <p>Qualified paleontologist shall maintain daily logs on an on-going basis for the duration of ground disturbing activities.</p> <p>Should construction activities be ceased due to discovery of fossils, the City shall be notified.</p> <p>d) If fossils are encountered during ground disturbing activities, their significance shall be determined and, if required, delivered to an</p>	<p>e) Final monitoring report submitted to the City within 90 days of completion of excavation and ground-disturbing</p>

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Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>e) Prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the paleontological monitoring. If there are significant discoveries, fossil locality information and final disposition shall be included with the final report which would be submitted to the appropriate repository 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 could affect Older Quaternary Alluvium.</p>			<p>accredited repository.</p> <p>e) A final monitoring and mitigation report shall be submitted within 90 days of completion of excavation and other ground disturbing activities.</p>	<p>activities</p>

4.13 Tribal

**Impact TCR-1:** Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in

**MM TCR-1: Retention of a Tribal Cultural Resources Monitor/Consultant.** Prior to the commencement of any ground disturbing activity at the Project area, the contractor 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's

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<p>Public Resources Code section 5020.1(k); or</p> <p>ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>	<p>ECDD-Building Safety Division prior to the issuance of any permit necessary to commence a ground-disturbing activity. The Tribal 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 Tribal Monitor will complete daily monitoring logs that will include construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project area are completed, or when the Tribal Representatives and Tribal Monitor have indicated that all upcoming ground-disturbing activities at the Project area 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 Tribal monitor approved by the Consulting Tribe. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes. If human remains and/or grave goods are discovered or recognized at the</p>	<p>shall be notified of the discovery.</p> <p>Construction shall resume once the qualified archaeologist has made a determination on the significance of the discovered resource(s). If historical resources or unique archaeological resources are discovered, avoidance and preservation measures would be implemented.</p> <p>A Cultural Resources Treatment Plan shall be required during construction if data recovery through excavation is the only feasible mitigation available. During construction, if the resources are identified as Native American, the qualified archaeologist and Contractor/Operator shall consult with appropriate Native</p>
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4.0 Mitigation Monitoring and Reporting Program

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>Project area, all ground disturbance shall immediately cease, and the county coroner shall be notified per Public Resources Code Section 5097.98, and Health &amp; 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 area 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</p>	<p>4.0-16</p>		<p>American representatives. A final monitoring and mitigation report shall be submitted within 90 days of completion of excavation and other ground disturbing activities that require monitoring.</p>	

4.0 Mitigation Monitoring and Reporting Program

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>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. <b>MM TCR-4 and MM TCR-5</b> will supplement <b>MM TCR-1</b>. <b>MM TCR-2: Monitoring and Mitigation Plan.</b> Prepare, design, and implement a monitoring and mitigation program for the Project. The Plan 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 Plan shall be prepared and approved by a qualified archaeologist prior to the issuance of the first grading permit.</p>	<p>Contractor/ Operator</p>	<p>JPA/DPW</p>	<p>A Monitoring and Mitigation Plan will be prepared and designed prior to the issuance of any permit by the City for ground-disturbing activity for each site or phase of the Project, as applicable. The Division to review and approve Monitoring and Mitigation Plan shall be implemented for the duration of Project construction.</p>	<p>Qualified archaeologist retained by Contractor/Operator shall be subject to review/approval by ECDD-Building Safety Division to confirm designee's qualifications ECDD-Building Safety Division to review and approve Monitoring and Mitigation Plan to confirm that the plan meets the requirements of this mitigation measure.</p>
	<p><b>MM TCR-3: Cultural Resources Sensitivity Training.</b> 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</p>	<p>Contractor/ Operator</p>	<p>JPA/DPW</p>	<p>A Cultural Resources Sensitivity Training shall be conducted prior to the start of ground disturbing activities; additional training shall be conducted for new</p>	

4.0 Mitigation Monitoring and Reporting Program

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>removal, pavement removal, etc.) and will present the Plan as outlined in (a), 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.</p>			<p>construction personnel during construction, as needed.</p>	

**MM TCR-4: Archaeological and Native American Monitoring.** Contractor/ Operator JPA/DPW

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 Plan. 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

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Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>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.</p>				

- 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 project applicant regarding recommendation for treatment and ultimate disposition of the resource(s).
- 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

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	<p>site into a permanent conservation easement.</p> <p>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 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 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.</p>	4.0-20			

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	<p>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.</p> <p>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 applicant. The final monitoring report shall be submitted to the applicant within 90 days of completion of excavation and other ground disturbing activities that require monitoring.</p>				

Contractor/  
Operator

**MM 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

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Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>accordance with PRC Section 5097.98<sup>2</sup> and Health and Safety Code Section 7050.5.<sup>3</sup> Additionally, the contractor shall notify the City, and the tribal cultural resources monitor and archaeological monitor.</p> <p>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.</p> <p>No further excavation or disturbance of the discovery or any nearby area reasonably suspected to overlie adjacent remains (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</p>				

2. NAGPRA, Title 43, Public Lands: Interior, Subtitle A, Office of the Secretary of the Interior, Part 10, Native American Graves Protection and Repatriation Regulations, § 5097.98 – Notification of discovery of Native American human remains, descendants; disposition of human remains and associated grave goods.
3. California / Health and Safety Code – HSC / CHAPTER 2. General Provisions [7050.5. - 7055.] / Section 7050.5.

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	<p>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.</p> <p>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.</p> <p>If the Tribe is designated MLD, the following standards shall apply and the following requirements and treatment measures shall be implemented.</p> <p>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</p>				

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	<p>human remains can also be considered as associated funerary objects.</p> <p>Prior to the continuation of ground disturbing activities, the landowner 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 covered 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:</p> <p><i>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.</i></p> <p>If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. The Tribe shall approve additional types of documentation for data recovery purposes. Cremations must either be removed in bulk or by means as necessary to ensure completely recovery of all material. If</p>	4.0-24			

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Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>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.</p> <p>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.</p> <p>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</p>	4.0-25			

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Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p><b>4.1 Aesthetics</b></p> <p><b>PDF AES-1 Construction (CCP)</b></p> <p>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:</p> <ul style="list-style-type: none"> <li>• Temporary lighting will be limited to the amount necessary to safely perform the required work and will 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.</li> <li>• Light trespass shall not exceed one foot-candle above ambient light level as measured at any adjacent residential and transient properties.</li> <li>• Temporary sidewalks and any sidewalk adjacent to construction activities shall be illuminated to City Standards to protect public safety.</li> <li>• To minimize the visual effects of construction the following measures shall be implemented:</li> <li>• 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.</li> <li>• 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</li> </ul>	Contractor/ Operator	JPA/DPW	Ongoing during construction. Adjacent residences within 500 feet of the Project shall be notified prior to the issuance of any grading or ground-disturbing activity for any phase of the Project.	

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4.0 Mitigation Monitoring and Reporting Program

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>vehicles with minimal disruption near residential neighborhoods.</p> <p><b>PDF AES-2 Tree Replacement (CCP)</b></p> <p>A Tree Removal and Replacement Plan will 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:</p> <ul style="list-style-type: none"> <li>• Tree removal and replacement shall comply with the City of Inglewood Municipal Code and the Design Guidelines.</li> <li>• Removal of existing healthy and flourishing trees will be avoided where feasible.</li> <li>• 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.</li> <li>• New permanent replacement palm trees shall be a minimum of 20 feet in height.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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</li> </ul>	Project Task Force, Contractor/ Operator	JPA/DPW- Environmental Services Division	Prior to the issuance of a grading permit or ground-disturbing activity, a tree permit shall be obtained. All replacement trees shall be maintained for a minimum of 3 years during operation and shall be inspected after 1 year. Contractor must replace trees within six months of restoration and completion of Project portions.	

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<p>trees and landscaping for one (1) year after planting. Prior to the end of the one-year warranty period, the City and the Contractor will 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.</p> <p><b>PDF AES-3 Lighting (Design Guidelines)</b></p> <p><u>Station Design</u></p> <ul style="list-style-type: none"> <li>Station canopies will have indirect accent lighting.</li> <li>Lighting will clearly highlight pedestrian paths including those to stairs, escalators, and elevators.</li> <li>Accent and functional lighting will be strategically placed to minimize spillover.</li> <li>Accent and functional lighting controls will be programmable, and sensor controlled to allow for energy efficiency and various settings such as daytime, nighttime, and event lighting.</li> </ul> <p><u>Guideway And Support Structure Design</u></p> <ul style="list-style-type: none"> <li>Where provided, guideway indirect accent lighting will complement station lighting design.</li> <li>Light fixtures will be concealed or minimally visible.</li> <li>Accent and functional lighting will be strategically placed to minimize spillover.</li> </ul>	Contractor/ Operator	JPA/DPW-Engineering Division	Lighting design features shall be shown on building plans for the ATS, prior to the issuance of building permits for the ATS.	
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Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<ul style="list-style-type: none"> <li>Code required lighting along the guideway will be designed to minimize visibility from the ground level.</li> <li>Street lighting will be supplemented as needed to provide a consistent light level on the sidewalk and roadway along the project alignment</li> </ul> <p><u>Maintenance And Storage Facility</u></p> <ul style="list-style-type: none"> <li>Where provided, functional lighting will be placed to minimize spillover</li> <li>Building entrances will be well lit.</li> <li>Lighting will clearly highlight pedestrian paths including those to ramps, stairs, escalators, and elevators</li> <li>Public uses on the ground plane of the MSF Site including any covered parking areas will be well lit with particular attention paid to the comfort and safety of the public.</li> </ul> <p><u>Elevated Passenger Walkway</u></p> <ul style="list-style-type: none"> <li>Where provided, functional lighting will be placed to minimize spillover.</li> <li>Overall lighting design will not interfere with roadway traffic below.</li> <li>Accent lighting will complement station lighting design.</li> <li>Accent and general lighting controls will be programmable and sensor controlled to allow for daytime, nighttime, and event settings.</li> </ul> <p><b>PDF AES-4 Tree Placement (Design Guidelines)</b></p> <ul style="list-style-type: none"> <li>An arborist report surveying the condition and extents of all existing trees in the Project area will 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</li> </ul>	Contractor/ Operator	JPA/ DPW-Engineering Division	Tree placement locations shall be shown on building plans for the ATS, prior to the issuance of building permits for the ATS.	The arborist shall be certified by the International Society for Arboriculture (ISA).
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4.0 Mitigation Monitoring and Reporting Program

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>Project.</p> <ul style="list-style-type: none"> <li>Existing flourishing trees (as identified in the arborist report) will remain, where feasible.</li> <li>An Approved Plant Palette based on the City's approved street tree list will be used as a basis for all sections of new trees.</li> <li>The quantity and species of existing trees removed by the ITC Project will be replaced in accordance with the City's current landscape guidelines.</li> <li>Protected species in the Inglewood Municipal Code, Tree Preservation will remain.</li> <li>City of Inglewood guidelines for tree spacing will be followed, considering species of trees and the desired canopy coverage.</li> <li>Trees will be planted on both sides of the roadway where feasible.</li> <li>Trees will be positioned at regular intervals relative to the guideway column supports to create a consistent rhythm.</li> <li>On Market Street, trees will be planted at a rhythm and scale to create a continuous visual canopy over the pedestrian realm, where feasible.</li> <li>On Manchester Boulevard, trees will be planted at a rhythm consistent with the street trees east and west of the Project, in alignment with the shape of the roadway.</li> <li>On Prairie Avenue, trees on the east side will continue the stately rhythm from the Inglewood Cemetery north of Manchester Boulevard. Trees on the west side will be spaced to match the rhythm of the east side and the guideway support structure to the extent feasible.</li> </ul>			4.0-32	
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4.0 Mitigation Monitoring and Reporting Program

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p><b>PDF AES-5 Signage (Design Guidelines)</b></p> <ul style="list-style-type: none"> <li>Physical Non-Digital Signage incorporated into the Project will have a distinct visual graphic identity that is consistent across all physical design elements of the project</li> <li>All signage will be approved by City of Inglewood and the Authority Having Jurisdiction (AHJ).</li> <li>Existing signage along the entire ITC alignment, which are affected, will be replaced, along with its infrastructure, and will meet its originally intended design intent and function.</li> <li>Signage replaced that originated on private property will be approved by the City of Inglewood and the sign/property owner.</li> </ul>	Contractor/ Operator	JPA/ DPW- Engineering Division/AHJ	Signage shall be shown on building plans for the ATS, prior to the issuance of building permits for the ATS.	
<p><b>4.2 Air Quality</b></p> <p><b>PDF AQ-1 Construction Air Quality Program (CCP)</b></p> <p>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.</p>	Contractor/ Operator	JPA/DPW	Construction equipment requirements for equipment operating at the Project Site, as well as the construction protocols shall be included in applicable bid documents prior to seeking bids for construction. A comprehensive inventory of all off-road construction equipment for activities being permitted shall be made available to SCAQMD prior to issuance of any permits for construction activities by the City of Inglewood for each site or phase, as applicable. Construction equipment features for equipment	
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<p>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.</p>			<p>operating at the Project Site, as well as the construction protocols shall be implemented during any ground disturbing activities and construction activities on an on-going basis. Periodic reporting and provision of written construction documents by the Contractor and compliance inspections by the City would be required on an ongoing basis during construction.</p>	
<p>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.</p> <ul style="list-style-type: none"> <li>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</li> </ul>				
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<p>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.</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> </ul>				
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Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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</li> </ul>				
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<p>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.</p> <ul style="list-style-type: none"> <li>Require the use of electric or alternatively fueled (e.g., natural gas) sweepers with high-efficiency particulate air (HEPA) filters.</li> <li>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.</li> <li>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.</li> <li>To the extent feasible, allow construction employees to commute during off-peak hours.</li> <li>Make access available for on-site lunch trucks during construction, as feasible, to minimize off-site construction employee vehicle trips.</li> <li>Every effort shall be made to utilize grid-based electric power at any construction site, where feasible.</li> <li>Contractors shall maintain and operate construction equipment to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications and documentation demonstrating proper maintenance, in accordance with the manufacturer's specifications, shall be maintained on site. Tampering with construction equipment to increase horsepower or to defeat emission control devices must be prohibited.</li> </ul>				
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Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<ul style="list-style-type: none"> <li>Require in all applicable bid documents, purchase orders, and contracts of the requirement to notify all construction vendors, contractors, and/or haul truck operators that vehicle and construction equipment idling time will be limited to no longer than five minutes, consistent with the CARB's policy. For any idling that is expected to take longer than five minutes, the engine should be shut off. Notify construction vendors, contractors, and/or haul truck operators of these idling requirements at the time that the purchase order is issued and again when vehicles enter the Project area. To further ensure that drivers understand the vehicle idling requirement, post signs at the proposed Project entry gates and throughout the Project alignment, where appropriate, stating that idling longer than five minutes is not permitted.</li> </ul>				
<b>4.4 Cultural Resources</b>				
<p><b>PDF CUI-1 Historic Resources (Design Guidelines)</b></p> <p>The final Project design must consider design variables (elevation of guideway, width of guideway, distance of the guideway from the resources, and the dimensions, placement, and spacing of support columns) and resource variables (building's height, scale, number of street-facing facades, width of primary facade, front setback, project elements overhanging the sidewalk, and viewpoints from which the resource can best be discerned in its entirety). The final Project design shall ensure minimal impacts to the setting of historical resources, and little or no visual obstruction of the resource's street-facing facades from the optimal viewpoints. In order to meet these performance-based standards, the following Project Design Features shall be incorporated into the final Project design:</p> <ul style="list-style-type: none"> <li>The guideway's elevation and distance from the façade of the historical resource will be sufficient for the guideway to visually clear the top of the historical resources' street-facing</li> </ul>	Contractor/ Operator	JPA/ DPW- Engineering Division	Guideway and support column design, elevation, and distance from known resources shall be shown on building plans for the ATS, prior to the issuance of building permits for the ATS.	
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<p>façade(s) when viewed from the optimal viewpoints. The final Project design is expected to achieve no visual obstruction of any of the identified historical resources from the guideway.</p> <ul style="list-style-type: none"> <li>At the former Fox Theatre, and for 100 feet on either side of the resource, the guideway elevation (measured from the ground plane to the underside of the guideway structure) will be a minimum of 52 feet from grade in order to achieve unobstructed views of this resource, including its monumental sign pylon.</li> <li>The dimensions, placement, and spacing of the guideway support columns will be such that the obstruction of views of the historical resources' street-facing façade(s) when viewed from the optimal viewpoints will be minimized. For five of the identified historical resources—Holy Faith Episcopal Church, former United Bank of California (now Broadway Federal Bank), former Fox Theatre, Professional Building, and Inglewood Park Cemetery—the final Project design is expected to completely avoid visual obstructions from support columns.</li> <li>For five of the historical resources—the former Bank of Inglewood, former J.C. Penney, Bank of America, the Forum, and Lighthouse McCormick Mortuary Mortuary—views that are completely unobstructed by support columns are not necessary for the resource to convey its significance. A small portion of the resources' primary façades will be intermittently obscured depending on the position of the viewer. However, due to the scale and/or setback of these resources, their primary façades will remain readily discernable.</li> </ul>				
<b>4.5 Energy</b>				
<p><b>PDF ENERGY-1 (Design Guidelines)</b></p>	Contractor/	JPA/ DPW- Engineering	Energy efficient design features shall be shown on	
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<ul style="list-style-type: none"> <li><b>Energy Efficiency</b> - Where California Energy Standards apply, the project should be more energy efficient than allowed. For energy-using equipment not governed by California Energy Efficiency Standards, best available energy efficient technologies should be used. Advanced commissioning of building systems should be conducted to ensure systems are operating as designed.</li> <li>To achieve energy use reduction, passive strategies taking advantage of the favorable local climate should be considered where feasible. The use of solar canopies as shade structures in addition to roof-mounted solar is another energy saving strategy.</li> <li><b>Water Efficiency</b> - In order to reduce excessive water consumption, the project should identify and implement appropriate opportunities to reduce or eliminate potable water use indoors and in landscape areas.</li> <li><b>Material Conservation And Resource Efficiency</b> - In order to reduce the environmental impact from the use of construction materials the project should minimize the use of virgin materials. This can be accomplished by increasing the use of materials that are reused, recycled, rapidly renewable, locally sourced, and durable. In order to determine the best approach to reducing the overall environmental impact from use of materials, a life cycle assessment (LCA) could be used.</li> <li><b>Environmental Quality</b> - In order to protect and enhance the health and comfort of occupants, the project should provide a high quality, sustainable indoor environment that is designed to maximize natural daylighting and views of the outdoors where feasible. Indoor spaces should use high efficiency air filtration and should create a comfortable indoor acoustical environment. Materials and systems should be selected that will provide for a healthy indoor environment.</li> </ul>	Operator	Division	building plans for the ATS, prior to the issuance of building permits for the ATS.	

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<p><b>4.8 Hazards and Hazardous Materials</b></p> <p><b>PDF HAZ-1 Hazardous Materials Program (CCP)</b></p> <p>The following practices will be followed during construction to address the potential for encountering hazardous materials during construction of the Project.</p> <ul style="list-style-type: none"> <li><b>Building Demolition Plan</b> – Prior to any demolition occurring, conduct an evaluation of all buildings built prior to 1980 to be demolished to identify the presence of asbestos containing materials (ACMs) and lead-based paint (LBP). Remediation shall be implemented in accordance with the recommendations of these evaluations to ensure that no ACMs or LBP remain present and to ensure ACMs and LBP are removed to levels established for public safety.</li> <li><b>Hazardous Materials Contingency Plan</b> – Prior to construction, prepare a plan addressing the potential for discovery of unidentified underground storage tanks (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 materials encountered during construction are removed to levels established for public safety.</li> <li><b>Soil Management Plan</b> – After final construction plans are prepared showing the lateral and vertical extent of soil excavation during construction are prepared, prepare a Soil Management Plan to 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.</li> <li><b>Health and Safety Plan</b> – Prior to construction, prepare a</li> </ul>	Contractor/Operator	JPA/DPW	<p>A Building Demolition Plan, Hazardous Materials Contingency Plan, Soil Management Plan, and Health and Safety Plan shall be prepared and submitted prior to issuance of any permits by the City of Inglewood for ground disturbing activities for each site or phase of the Project, as applicable.</p> <p>Implementation of the plans shall be on-going for the duration of construction.</p> <p>If unidentified or suspected contaminated soils or groundwater is encountered, any further ground disturbing activities shall be conducted according to a site- specific health and safety plan and the City shall be notified of this contamination.</p> <p>If contaminated soils or groundwater is encountered, ground disturbing activities shall not recommence until remediation is completed and a "no further action" letter is obtained or direction is otherwise given from the</p>	<p>ECDD-Building Safety to confirm that Contractor/Operator has submitted SMP, and that appropriate regulatory agency has approved it</p>

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Health and Safety Plan to address the potential for exposure to the constituents of concern identified in the limited Phase II ESA.			appropriate regulatory agency that construction can commence.	
<b>4.10 Noise</b>				
<b>PDF-NOISE-1 Construction Noise Control Plan (CCP)</b>	Contractor/Operator, Community Affairs Liaison	JPA/DPW-Engineering Division	A Construction Noise Control Plan shall be prepared or updated and approved prior to the issuance of any permits for construction activities by the City for each site or phase of the Project, as applicable. The approved Construction Noise Control Plan shall be implemented for the duration of Project construction.	Acoustical consultant retained by Contractor/Operator subject to review and approval by DPW-Engineering Division to confirm that designee has requisite expertise. The City will designate a Community Affairs Liaison to be responsible for responding within 24 hours to any local complaint or question about construction activities. A website will be established with project construction information and contact information for the Community Affairs Liaison. A toll-free phone line
<p>A Construction Noise Control Plan shall be developed in coordination with an acoustical/vibration consultant approved by the City and 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 Federal Transit Administration (FTA)'s General Assessment Construction Noise Criteria. The following construction noise reduction measures shall be incorporated into the plan:</p> <ul style="list-style-type: none"> <li>Install temporary noise barriers that reduce sound at receptors;</li> <li>For any idling that is expected to take longer than five minutes, the engine shall be shut off;</li> <li>All equipment shall be equipped with optimal muffler systems;</li> <li>Use solar, battery powered, or hybrid equipment whenever practical;</li> <li>Locate staging areas as far away from sensitive receptors as feasible;</li> <li>Locate stationary noise sources as far away from sensitive receptors as feasible;</li> <li>Enclose stationary noise sources, such as diesel-or gasoline-powered generators, with acoustical barriers where necessary and required; <ul style="list-style-type: none"> <li>If stationary equipment cannot be enclosed within a</li> </ul> </li> </ul>				
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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.				(available 24 hours a day) and website will be made a part of all construction notices and shall be posted in prominent public facing locations around the Project area and in adjacent public spaces.
<ul style="list-style-type: none"> <li>Pole power shall be utilized to the maximum extent feasible in lieu of generators.</li> <li>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.</li> <li>Coordinate with Inglewood Unified School District administrators to avoid disruptive noise during school hours.</li> </ul> <p>In order to ensure that construction noise levels will be below the established standards, the following shall be incorporated into the Plan:</p> <ul style="list-style-type: none"> <li>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.</li> <li>In the event the warning level (dBA) is exceeded, construction activities shall be temporarily halted in the</li> </ul>				
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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 of heavy-duty construction equipment being operated simultaneously.
- Operate equipment at the lowest possible power levels.
- Modifying equipment, such as dampening of metal surfaces or other redesign to minimize metal-to-metal impacts.

**PDF NOISE-2 Construction Vibration Reduction Plan (CCP)**

Prior to the issuance of any demolition or construction permit for each phase of the 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 to ensure impacts from ground borne vibration are less than significant:

- 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

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Contractor/ Operator	IPA/DPW- Engineering Division	A Construction Vibration Reduction Plan shall be prepared or updated and approved prior to the issuance of any permits for construction activities by the City for each site or phase of the Project, as applicable. The approved Construction Vibration Reduction Plan shall be implemented for the duration of Project construction.	The City will designate a Community Affairs Liaison to be responsible for responding within 24 hours to any local complaint or question about construction activities. A website will be established with project construction information and contact information
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Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
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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 project activities.
- Crack gauges shall be installed on multiple representative cracks, particularly on sides of the building facing the 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 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 post-construction 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-

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4.0-45

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Implementing Party	Monitoring Party	Timing	Notes
			for the Community Affairs Liaison. A toll-free phone line (available 24 hours a day) and website will be made a part of all construction notices and shall be posted in prominent public facing locations around the Project area and in adjacent public spaces.

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>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.</p> <ul style="list-style-type: none"> <li>- 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.</li> <li>- 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.</li> <li>- 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.</li> <li>- 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</li> </ul>				
<p><i>Meredian Consultants</i> 251-004-20</p>	4.0-46			<p><i>Inglewood Transit Connector Project</i> February 2022</p>

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>changes in vibration levels.</p> <ul style="list-style-type: none"> <li>• Post-Construction Reporting and Repairs: <ul style="list-style-type: none"> <li>- 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 post-construction 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 Project and/or show how the 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 post-construction line and grade survey shall also be included in this report.</li> <li>- 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 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.</li> </ul> </li> </ul>				
<ul style="list-style-type: none"> <li>• To minimize the risk of potential structural and building damage: <ul style="list-style-type: none"> <li>- 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.</li> </ul> </li> </ul>				
<p><i>Meredian Consultants</i> 251-004-20</p>	4.0-47			<p><i>Inglewood Transit Connector Project</i> February 2022</p>

4.0 Mitigation Monitoring and Reporting Program

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<ul style="list-style-type: none"> <li>Limit the number of jackhammers operating simultaneously to one (1) piece operating within 45 feet of off-site sensitive receptors.</li> <li>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.</li> </ul>				
<ul style="list-style-type: none"> <li>To minimize the risk of related to human annoyance:                             <ul style="list-style-type: none"> <li>Limit the location of pile driving to 310 feet of off-site vibration sensitive receptors.</li> <li>Limit the location of vibratory roller to 150 feet of off-site vibration sensitive receptors.</li> <li>Limit the location of large bulldozer to 85 feet of off-site vibration sensitive receptors.</li> <li>Limit the location of caisson drilling to 85 feet of off-site vibration sensitive receptors.</li> <li>Limit the location of loaded trucks to 75 feet of off-site vibration sensitive receptors.</li> <li>Limit the location of jackhammers to 45 feet of off-site vibration sensitive receptors.</li> <li>Limit the location of small bulldozer to 25 feet of off-site vibration sensitive receptors.</li> </ul> </li> </ul>				
<p><b>PDF NOISE-3 Operational (CCP)</b></p> <p>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.)29F</p> <p>The design of any barriers along the guideway designed to reduce noise shall be subject to the limits noted in <b>Table 4.10-9</b>.</p>	Operator	JPA/DPW-Engineering Division		
<p>Meredian Consultants 251-004-20</p>	4.0-48			<p>Inglewood Transit Connector Project February 2022</p>

4.0 Mitigation Monitoring and Reporting Program

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p><b>4.12 Transportation</b></p> <p><b>PDF TRANS-1 Transit Access and Circulation Program (CCP)</b></p> <p>The Project Task Force (as identified in the Construction Commitment Program) will be responsible for the following:</p> <ul style="list-style-type: none"> <li>Ensuring that access to bus transit stops and bus circulation are always maintained, unless infeasible and closure is approved by the City.</li> <li>Coordinating with Metro and any other transit service providers to:                             <ul style="list-style-type: none"> <li>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.</li> <li>Reroute transit bus lines if necessary, during construction with appropriate wayfinding signage and information dissemination.</li> </ul> </li> </ul>	Project Task Force	JPA/DPW-Transportation & Traffic Division, Project Task Force		<p>The Plan shall be implemented prior to start of construction activities for each site or phase of the Project, as applicable. Access to bus transit stops and maintenance of bus circulation would be ongoing during construction.</p>
<p><b>PDF TRANS-2 Construction Staging &amp; Traffic Control Program (CCP)</b></p> <p>A Construction Staging and Traffic Control Program will be developed by members of the Project Task Force (as defined in the Construction Commitment Program), subject to review and acceptance by the City and/or the JPA, and will address the following topics:</p> <ul style="list-style-type: none"> <li>Coordination with other public infrastructure projects within the City's boundaries</li> <li>Detour routes, including analysis of impacts to pedestrian, business, bicycle, transit, and traffic flow</li> <li>Coordination of closures and restricted access during the construction period with special attention during periods of</li> </ul>	Project Task Force	JPA/DPW-Transportation & Traffic Division		<p>The Program shall be implemented prior to start of construction activities for each site or phase of the Project, as applicable. Notification of street closures would be posted online 45 to 60 days prior to closures.</p>
<p>Meredian Consultants 251-004-20</p>	4.0-49			<p>Inglewood Transit Connector Project February 2022</p>

4.0 Mitigation Monitoring and Reporting Program

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>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.</p> <ul style="list-style-type: none"> <li>Coordination with the City, police, and fire services department regarding maintenance of emergency access and response times</li> <li>Monitoring and coordination of construction materials deliveries</li> <li>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.</li> </ul> <p>The Traffic Control Program will be updated as needed based on the following principals:</p> <ul style="list-style-type: none"> <li>Minimize traffic impacts on residential streets.</li> <li>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.</li> <li>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.</li> <li>Maintain access for all public safety vehicles (such as police,</li> </ul>				
<p><i>Meridian Consultants</i> 251-004-20</p>	4.0-50			<p><i>Inglewood Transit Connector Project</i> February 2022</p>

4.0 Mitigation Monitoring and Reporting Program

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>fire, and emergency response).</p> <ul style="list-style-type: none"> <li>Maintain bicycle and pedestrian access within the Project area or approved detours at all times.</li> <li>Provide adequate street access to City service vehicles, including but not limited to trash pickup and street sweeping service vehicles, during planned service times.</li> <li>Sidewalk closures should 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.</li> <li>Use traffic control officers/flaggers as appropriate to minimize the degree and duration of impacts and maintain safety.</li> <li>Establish and maintain wayfinding signage.</li> <li>Maintain vehicular and pedestrian access to all businesses and residents impacted by construction activities including roadway closures.</li> <li>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.</li> <li>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.</li> </ul> <p><b>PDF TRANS-3 Preliminary Haul and Overload Routes (CCP)</b></p> <ul style="list-style-type: none"> <li>Haul routes and overload/oversized vehicle routes are subject to review and approval by the City.</li> <li>To the extent possible, truck deliveries and hauling of bulk materials such as aggregate, bulk cement, dirt, etc. to the</li> </ul>				
<p><i>Meridian Consultants</i> 251-004-20</p>	4.0-51	JPA/DPW-Transportation & Traffic Division		<p><i>Inglewood Transit Connector Project</i> February 2022</p>
		Contractor/Operator		<p>Haul routes shall be designated prior to start of construction activities for each site or phase of the Project, as</p>

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>Project area, and hauling of material from the Project area, shall be scheduled during off-peak hours to avoid the peak commuter traffic periods on designated haul routes.</p> <ul style="list-style-type: none"> <li>Truck deliveries and hauling of dirt, aggregate, bulk cement, and all other materials and equipment, shall be on designated routes only (freeways and nonresidential streets).</li> </ul> <p><b>PDF TRANS-4 Pedestrian Access Program (CCP)</b></p> <p>A Pedestrian Access Program will be developed by members of the Project Task Force (as defined in the Construction Commitment Program), subject to review and acceptance by the City and/or the JPA, and will adhere to the following principles:</p> <ul style="list-style-type: none"> <li>Pedestrian access to buildings shall be maintained at all times.</li> <li>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.</li> <li>Establish and maintain pedestrian wayfinding signage.</li> <li>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.</li> <li>Sidewalks that are being maintained in a temporary condition shall meet all applicable safety standards, including but not limited to the requirements of the Federal Americans with Disabilities Act and similar California laws for sidewalks being maintained in a temporary condition.</li> <li>Protect pedestrians from construction-related debris, dust, and noise; such protection may include the use of dedicated pedestrian barriers.</li> <li>Coordinate with the Inglewood Unified School District 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.</li> </ul>	Project Task Force	JPA/DPW-Transportation & Traffic Division	The Program shall be implemented prior to start of construction activities for each site or phase of the Project, as applicable.	
<p>Meredian Consultants 251-004-20</p>	4.0-52			<p>Inglewood Transit Connector Project February 2022</p>

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p><b>PDF TRANS-5 Parking Management Plan (CCP)</b></p> <p>A Parking Management Plan (as defined in the Construction Commitment Program) will 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:</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>Provide public notice of the availability of the alternative parking spaces through outreach to businesses and residents with signage.</li> </ul>	Project Task Force	JPA/DPW-Transportation & Traffic Division	The Plan shall be implemented prior to start of construction activities for each site or phase of the Project, as applicable.	
<p>Meredian Consultants 251-004-20</p>	4.0-53			<p>Inglewood Transit Connector Project February 2022</p>

# Construction Commitment Program

February 2022



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## INGLEWOOD TRANSIT CONNECTOR PROJECT CONSTRUCTION COMMITMENT PROGRAM

### 1.0 INTRODUCTION

The Inglewood Transit Connector (ITC) Project includes this Construction Commitment Program to proactively address the potential effects of the construction of the Project on the community. This Program addresses:

- Business and community support plans
- Construction staging and traffic control requirements
- Maintaining access to parking, businesses, residences, and pedestrian facilities
- Noise and vibration measures
- Air quality measures
- Other vital measures during construction
- Tree removal and replacement

A Project Task Force will be established for the ITC Project. The Project Task Force will include representation from the following entities:

- City of Inglewood (City)
- The ITC Joint Powers Authority (JPA) – that will be responsible for the oversight of the DBFOM Contractor during the design, construction and subsequent operations and maintenance of the ITC Project.

The DBFOM Contractor (responsible for the design, build/construct, finance, operations, and maintenance of the ITC Project)

### 2.0 BUSINESS AND COMMUNITY SUPPORT PROGRAM

The Project Task Force will be responsible for developing a Business and Community Support Program for the purpose of assisting those businesses financially affected by the construction that addresses the following:

- 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

effects.

- 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 BUSINESS ~~INTERRUPTION~~ASSISTANCE FUND PROGRAM

The City is committed to providing financial assistance to small “mom and pop” businesses to help offset to the extent possible, business revenue losses or increased expenses that are directly attributable to disruptions during the ITC construction activities within the ITC Project area. The City will create a \$5 million dollar Business ~~Interruption~~Assistance Fund (~~BIF~~BAF) to provide financial assistance through grants to eligible businesses for eligible expenses as established by the ~~BIF~~BAF Program Administrator. Similar to the LA Metro BIF model, businesses may file multiple requests for financial assistance through the BIF; but in no event will the amount paid exceed the lesser total amount of \$50,000, or 60% of annual business revenue losses per business. The financial assistance is expected to cover eligible fixed operating expenses such as utilities, insurance, rent or mortgage (excluding the principal amount portion of the mortgage payment), fixed payroll, and certain other documented business-related expenses as determined by the ~~BIF~~BAF Program Administrator. ~~Consistent with Metro’s program, commercial property owners may file, however property owners may only file a claim for mortgage (excluding the principal amount portion of the mortgage payment), utilities, insurance, and other expenses as determined eligible by the BIF Program Administrator.~~ The City will develop Administrative Guidelines to establish program eligibility requirements targeted to businesses that are directly impacted by the ITC Project construction, are located within the eligible geographic area in proximity to the ITC Project, and that meet the definition of small “mom and pop” businesses; ~~anticipated~~ Anticipated requirements to participate in the program, include:

- Businesses must be in continuous operation for at least two years within the eligible geographic area.
- Businesses must provide financial records (e.g., gross receipts, payroll taxes, bank statements or other financial information as requested) to demonstrate the business revenue losses or increased expenses are directly attributable to the ITC construction activities during the period of disruption.
- Businesses must be financially solvent and have a good faith plan and commitment to remain in business within the eligible geographical area; and
- Businesses must be in good standing with all local, state and federal taxing and licensing authorities.

### 4.0 COMMUNITY AFFAIRS LIAISON

The Community Affairs Liaison shall be responsible for responding within 24 hours to any local complaint or question about construction activities. A website will be established with project construction information and contact information for the Community Affairs Liaison. A toll-free phone line (available 24 hours a day) and website will be made a part of all construction notices and shall be posted in prominent public facing locations around the Project area and in adjacent public spaces.

The Community Affairs Liaison shall receive all public complaints, investigate the cause of the complaint and develop/implement feasible measures to address and resolve the cause of the complaint.

### 5.0 TRANSIT ACCESS AND CIRCULATION PROGRAM

The Project Task Force will be responsible for the following:

- Ensuring that access to bus transit stops and bus circulation are always maintained, unless infeasible and closure is approved by the City.
- Coordinating 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.

### 6.0 CONSTRUCTION STAGING & TRAFFIC CONTROL PROGRAM

The Construction Staging and Traffic Control Program will be developed by members of the Project Task Force, subject to review and acceptance by the City and/or the JPA, and will 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, transit 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.

#### 6.1 Traffic Control Program Updates

The Traffic Control Program will be ~~updated~~ developed based on the following principles:

- 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 should 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.
- Entry and exit to the Market Street/Florence Avenue construction site shall be limited to right turns to/from Florence Avenue for large trucks, construction equipment, and material deliveries. An entrance off Locust Street between Florence Avenue and Regent Street will also be required to serve the contractor's offices and staging area. If required for phasing, the Locust Street entrance may also be used for large trucks, construction equipment, and material deliveries as approved by the City.

#### 6.12 Preliminary Haul And Overload Routes

- Haul routes and overload/oversized vehicle routes are subject to review and approval by the City.
- To the extent possible, truck deliveries and hauling of bulk materials such as aggregate, bulk cement, dirt, etc. to the Project area, and hauling of material from the Project area, shall be scheduled during off-peak hours to avoid the peak commuter traffic periods on designated haul routes.
- Truck deliveries and hauling of dirt, aggregate, bulk cement, and all other materials and equipment, shall be on designated routes only (freeways and nonresidential streets)

#### 6.23 Pedestrian Access Program

△ Pedestrian Access Program will be developed by members of the Project Task Force, subject to review and acceptance by the City and/or the JPA, and will 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 pedestrian 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 Federal 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 Inglewood Unified School District (IUSD) and the City to provide crossing guards at locations requested by IUSD or the City when crosswalks or sidewalks are closed. Identify temporary/alternative routes to schools, working closely with IUSD and the City and disseminate this information to schools and stakeholders affected by construction.

#### 7.0 PARKING MANAGEMENT PLAN

A Parking Management Plan will 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:

- 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.

#### 8.0 AIR QUALITY PROGRAM

- 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

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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, that 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.
  - The 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.

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- 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.
- Dust shall be controlled per local ordinances. The Contractor shall be responsible for excessive dust or construction debris that results in impacts to adjacent residences or private vehicles, including taking responsibility for clean-up and addressing complaints brought to the project.
- All trucks carrying fill materials, debris, or similar materials shall secure and cover loads to prevent dust or debris while travelling on public right of ways.
- All trucks removing materials from the site will be loaded within the site perimeter and will be required to cover loads as deemed necessary for dust control.
- Material stockpiles and construction area surfaces shall be covered and/or watered as needed to

prevent dust at designated construction areas.

- 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.
- Contractors shall maintain and operate construction equipment to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications and documentation demonstrating proper maintenance, in accordance with the manufacturer's specifications, shall be maintained on site. Tampering with construction equipment to increase horsepower or to defeat emission control devices must be prohibited.
- Require in all applicable bid documents, purchase orders, and contracts of the requirement to notify all construction vendors, contractors, and/or haul truck operators that vehicle and construction equipment idling time will be limited to no longer than five minutes, consistent with the CARB's policy. For any idling that is expected to take longer than five minutes, the engine should be shut off. Notify construction vendors, contractors, and/or haul truck operators of these idling requirements at the time that the purchase order is issued and again when vehicles enter the Project area. To further ensure that drivers understand the vehicle idling requirement, post signs at the proposed Project entry gates and throughout the Project alignment, where appropriate, stating that idling longer than five minutes is not permitted.

### 9.0 VISUAL RESOURCES PROGRAM

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 will be limited to the amount necessary to safely perform the required work and will 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.
- Construction night lighting shall be shielded to prevent a direct view of the light sources from residential properties with a property boundary that is within 150 feet of the construction site.
- 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.
- When not in use or being staged, heavy equipment shall be located as far as practicable from residential areas, businesses and pedestrian pathways.

### 10.0 HAZARDOUS MATERIALS PROGRAM

The following practices will be followed during construction to address the potential for encountering hazardous materials during construction of the Project.

- **Building Demolition Plan** – Prior to any demolition occurring, conduct an evaluation of all buildings built prior to 1980 to be demolished to identify the presence of asbestos containing materials (ACMs) and lead-based paint (LBP). Remediation shall be implemented in accordance with the recommendations of these evaluations to ensure that no ACMs or LBP remain present and to ensure ACMs and LBP are removed to levels established for public safety.
- **Hazardous Materials Contingency Plan** – Prior to construction, prepare a plan addressing the potential for discovery of unidentified underground storage tanks (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 materials encountered during construction are removed to levels established for public safety.
- **Soil Management Plan** – After final construction plans are prepared showing the lateral and vertical extent of soil excavation during construction are prepared, prepare a Soil Management Plan to 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.
- **Health and Safety Plan** – Prior to construction, prepare a Health and Safety Plan to address the potential for exposure to the constituents of concern identified in the limited Phase II ESA.
- Utility Relocation Work – All Project utility relocations in the vicinity of Kelso Elementary School shall be designed and constructed to remain within the public right-of-way and not impact school property. Relocations shall be located further away from the school as feasible and designed and constructed to current standards to assure that they create no unacceptable hazards to the school. During Project construction, any open trenches and construction equipment shall be marked and barricaded such that they are not accessible by the students or create any potential hazard to school operations. Project utility relocations or cut overs that may require disruption to school normal utility services shall be scheduled to occur outside of normal school hours with advanced notification to the School District.
- .

## 11.0 NOISE AND VIBRATION CONTROL PROGRAM

### 11.1 Construction Noise Control Plan

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 the Federal Transit Administration's (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.
- Staging of construction material deliveries behind fencing to minimize noise emitting from idling vehicles.
- On site-signage reminding workers to minimize noise generation.
- When not in use or being staged, heavy equipment shall be located as far as practicable from sensitive receptors.
- For project foundations, consider the use of drilled piles or sonic pile drivers or vibratory pile drivers instead of traditional impact pile drivers, as permitted by geological conditions.
- Sequence noisy activities to occur during the same general time period during daytime hours to the extent practical.
- Select quieter demolition methods where appropriate and feasible such that demolition activities can

remain within the project specified noise levels.

- Unless deemed infeasible for a particular construction activity, the Contractor shall utilize rubber tire earth moving equipment in lieu of track mounted earth moving equipment.
- Construction material deliveries shall take place within designated construction staging areas as far from residential sites as practical to minimize noise impacts.
- Provide signage at active construction sites and staging areas reminding workers, equipment operators and delivery vehicles to minimize noise levels to the extent possible.
- Rumble strips or signage shall be provided at roadway access points into contractor laydown and staging areas to slow construction vehicles and limit vehicle noise.
- Coordinate with Inglewood Unified School District administrators to avoid disruptive noise during school hours including scheduling heavy equipment such as cranes, haul trucks, concrete trucks, concrete pumps, pneumatic equipment, earth moving vehicles or similar to operate outside of school hours. The City shall require that the Project's construction noise during school hours would be limited to 5 dBA Leq 1-hour above the measured ambient noise levels at Kelso School property line as identified in the RDEIR. Activities that would exceed this threshold shall be scheduled to occur outside of normal school hours or mitigated with specific mitigation measures such as temporary sound walls, sound blankets, or other sound-attenuating devices. The City shall monitor the Project's construction noise levels during school hours to assure compliance. As requested by the District, monthly noise monitoring reports on noise levels during school hours at Kelso School will be provided to the District.

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

### 11.2 Construction Vibration Reduction Plan

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Prior to the issuance of any demolition or construction permit for each phase of the 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 to ensure impacts from ground borne vibration are less than significant:

- 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 project activities.
  - Crack gauges shall be installed on multiple representative cracks, particularly on sides of the building facing the 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 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

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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 [Joint Powers Authority and/or 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 [Joint Powers Authority and/or 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 post-construction 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 Project and/or show how the 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 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 (1) 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.

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- 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.

**12.0 TREE REMOVAL AND REPLACEMENT PLAN**

A Tree Removal and Replacement Plan will 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 will 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 12 (12) 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 will 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.

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ITC Errata

# Inglewood Transit Connector Project

## *EIR Errata*

**SCH NO. 2018071034**

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**February 28, 2022**

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- D** Construction Commitment Program

## 1.0 INTRODUCTION

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This Errata addresses minor revisions and additions to the Final EIR for the proposed Inglewood Transit Connector (ITC) Project (proposed Project) related to the responses to the comments from the Inglewood Unified School District (IUSD) on the Draft EIR. Specifically, minor revisions were made to the response to Comment 3-2 from the IUSD. The revision to this response clarifies the noise monitoring protocol during construction to be implemented to avoid noise impacts to Kelso School. Corresponding revisions were also made to the response to Mitigation Monitoring and Reporting Program (MMRP) in Section 4.0 of the Final EIR and the Construction Commitment Program (CCP) in Appendix D of the Final EIR.

The revisions and additions to the Final EIR, MMRP, and CCP included in this EIR Errata would not result in any new or substantially more significant impacts and are indicative of the City of Inglewood's (City's) commitment to implementing measures to avoid or lessen potential impacts to the greatest extent feasible.

## 2.0 REVISIONS AND ADDITIONS TO THE FINAL EIR

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The following revision has been made to Response to Comment 3-2 on page 3.0-11 of the Final EIR:

In order to ensure that acceptable noise levels are maintained at Kelso School ~~during the school day~~, real time noise monitoring will be conducted at Kelso School during the school day. A noise monitor will be located at the southeast corner of Kelso School on Prairie Avenue. This noise monitor will update the 1-hour Leq noise level every minute during the school day. Any time the ~~Leq~~ 1-hour Leq noise level increases by 3 dBA over the ambient noise level during the school day, an alert message will be sent to the construction manager(s) and contact(s) for the contractor(s) working in the vicinity of the school to allow for adjustments to be made to the work in progress to avoid noise levels reaching or exceeding an increase of 5 dBA 1-hour Leq over ambient noise levels. A contact will also be provided to the Inglewood Unified School District and administration at Kelso School to ~~discuss~~ resolve any District or Kelso School concerns with construction activities and their resulting noise levels ~~at any time~~ during the school day.

The following addition has been made to Project Design Feature (PDF) HAZ-1 in the Mitigation Monitoring Program on Page 4.0-41 of the Final EIR:

### **PDF HAZ-1 Hazardous Materials Program**

The following practices will be followed during construction to address the potential for encountering hazardous materials during construction of the Project.

- Building Demolition Plan – Prior to any demolition occurring, conduct an evaluation of all buildings built prior to 1980 to be demolished to identify the presence of asbestos containing materials (ACMs) and lead-based paint (LBP). Remediation shall be implemented in accordance with the recommendations of these evaluations to ensure that no ACMs or LBP remain present and to ensure ACMs and LBP are removed to levels established for public safety.
- Hazardous Materials Contingency Plan – Prior to construction, prepare a plan addressing the potential for discovery of unidentified underground storage tanks (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 materials encountered during construction are removed to levels established for public safety.
- Soil Management Plan – After final construction plans are prepared showing the lateral and vertical extent of soil excavation during construction are prepared, prepare a Soil Management Plan to 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.

- Health and Safety Plan – Prior to construction, prepare a Health and Safety Plan to address the potential for exposure to any constituents of concern that may be encountered during construction.
- Utility Relocation Work – All Project utility relocations in the vicinity of Kelso Elementary School shall be designed and constructed to remain within the public right-of-way and not impact school property. Relocations shall be located further away from the school as feasible and designed and constructed to current standards to assure that they create no unacceptable hazards to the school. During Project construction, any open trenches and construction equipment shall be marked and barricaded such that they are not accessible by the students or create any potential hazard to school operations. Project utility relocations or cut overs that may require disruption to normal school utility services shall be scheduled to occur outside of normal school hours with advanced notification to the School District.

The following addition has been made to Project Design Feature (PDF) NOISE-1 on Page 4.0-43 of the Final EIR:

**PDF-NOISE-1 Construction Noise Control Plan (CCP)**

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.
- Staging of construction material deliveries behind fencing to minimize noise emitting from idling vehicles.
- On site-signage reminding workers to minimize noise generation.
- When not in use or being staged, heavy equipment shall be located as far as practicable from sensitive receptors.
- For project foundations, consider the use of drilled piles or sonic pile drivers or vibratory pile drivers instead of traditional impact pile drivers, as permitted by geological conditions.
- Sequence noisy activities to occur during the same general time period during daytime hours to the extent practical.
- Select quieter demolition methods where appropriate and feasible such that demolition activities can remain within the project specified noise levels.
- Unless deemed infeasible for a particular construction activity, the Contractor shall utilize rubber tire earth moving equipment in lieu of track mounted earth moving equipment.
- Construction material deliveries shall take place within designated construction staging areas as far from residential sites as practical to minimize noise impacts.
- Provide signage at active construction sites and staging areas reminding workers, equipment operators and delivery vehicles to minimize noise levels to the extent possible.
- Rumble strips or signage shall be provided at roadway access points into contractor laydown and staging areas to slow construction vehicles and limit vehicle noise.
- Coordinate with the Inglewood Unified School District administrators to avoid disruptive noise during school hours, including scheduling heavy equipment such as cranes, haul trucks, concrete trucks, concrete pumps, pneumatic equipment, earth moving vehicles or similar to operate outside of school hours. The City shall require that the Project's construction noise during school hours would be limited to 5 dBA Leq 1-hour above the measured ambient noise levels at Kelso School property line as identified in the RDEIR. Activities that would exceed this threshold shall be scheduled to occur outside of normal school hours or mitigated with specific mitigation measures such as temporary sound walls, sound blankets, or other sound-attenuating devices. The City shall monitor the Project's construction noise levels during school hours to assure compliance. As requested by the District, monthly noise monitoring reports on noise levels during school hours at Kelso School will be provided to the District.

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.
  - In order to ensure that acceptable noise levels are maintained at Kelso School, real time noise monitoring will be conducted at Kelso School during the school day. A noise monitor will be located at the southeast corner of Kelso School on Prairie Avenue. This noise monitor will update the 1-hour Leq noise level every minute during the school day. Any time the 1-hour Leq noise level increases by 3 dBA over the ambient noise level during the school day, an alert message will be sent to the construction manager(s) and contact(s) for the contractor(s) working in the vicinity of the school to allow for adjustments to be made to the work in progress to avoid noise levels reaching or exceeding an increase of 5 dBA 1-hour Leq over ambient noise levels. A contact will also be provided to the Inglewood Unified School District and administration at Kelso School to resolve any District or Kelso School concerns with construction activities and their resulting noise levels during the school day.

## 3.0 ADDITION TO THE CONSTRUCTION COMMITMENT PROGRAM

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Provided below is an addition to the Construction Commitment Program (CCP). Changes are identified below by the corresponding CCP section and subsection, if applicable, and the page number. Additions are double underlined and deletions are shown in ~~strikethrough~~ format. It should also be noted that in response to comments received on the Recirculated Draft EIR and community and stakeholder outreach, modifications to the Construction Commitment Program (CCP), provided in Appendix D of the Final EIR were made. These changes are summarized in the relevant responses to comments, as applicable.

The following revision has been made to the Noise and Vibration Control Program on pages 11 through 13 of the CCP, included as Appendix D of the Final EIR:

### 11.0 NOISE AND VIBRATION CONTROL PROGRAM

#### 11.1 Construction Noise Control Plan

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 the Federal Transit Administration's (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.

- Staging of construction material deliveries behind fencing to minimize noise emitting from idling vehicles.
- On site-signage reminding workers to minimize noise generation.
- When not in use or being staged, heavy equipment shall be located as far as practicable from sensitive receptors.
- For project foundations, consider the use of drilled piles or sonic pile drivers or vibratory pile drivers instead of traditional impact pile drivers, as permitted by geological conditions.
- Sequence noisy activities to occur during the same general time period during daytime hours to the extent practical.
- Select quieter demolition methods where appropriate and feasible such that demolition activities can remain within the project specified noise levels.
- Unless deemed infeasible for a particular construction activity, the Contractor shall utilize rubber tire earth moving equipment in lieu of track mounted earth moving equipment.
- Construction material deliveries shall take place within designated construction staging areas as far from residential sites as practical to minimize noise impacts.
- Provide signage at active construction sites and staging areas reminding workers, equipment operators and delivery vehicles to minimize noise levels to the extent possible.
- Rumble strips or signage shall be provided at roadway access points into contractor laydown and staging areas to slow construction vehicles and limit vehicle noise.
- Coordinate with Inglewood Unified School District administrators to avoid disruptive noise during school hours including scheduling heavy equipment such as cranes, haul trucks, concrete trucks, concrete pumps, pneumatic equipment, earth moving vehicles or similar to operate outside of school hours. The City shall require that the Project’s construction noise during school hours would be limited to 5 dBA Leq 1-hour above the measured ambient noise levels at Kelso School property line as identified in the RDEIR. Activities that would exceed this threshold shall be scheduled to occur outside of normal school hours or mitigated with specific mitigation measures such as temporary sound walls, sound blankets, or other sound-attenuating devices. The City shall monitor the Project’s construction noise levels during school hours to assure compliance. As requested by the District, monthly noise monitoring reports on noise levels during school hours at Kelso School will be provided to the District.

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

In order to ensure that acceptable noise levels are maintained at Kelso School, real-time noise monitoring will be conducted at Kelso School during the school day. A noise monitor will be located at the southeast corner of Kelso School on Prairie Avenue. This noise monitor will update the 1-hour Leq noise level every minute during the school day. Any time the 1-hour Leq noise level increases by 3 dBA over the ambient noise level during the school day, an alert message will be sent to the construction manager(s) and contact(s) for the contractor(s) working in the vicinity of the school to allow for adjustments to be made to the work-in-progress to avoid noise levels reaching or exceeding an increase of 5 dBA 1-hour Leq over ambient noise levels. A contact will also be provided to the Inglewood Unified School District and administration at Kelso School to resolve any District or Kelso School concerns with construction activities and their resulting noise levels during the school day.

A stylized number '4' logo composed of two overlapping brush strokes. The top stroke is light green and the bottom stroke is light blue. The strokes are thick and have a soft, feathered edge.

**APPENDIX A**

**Mitigation Monitoring and Reporting Program**

## 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

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### 4.1 INTRODUCTION

Public Resources Code section 21081.6 and section 15097 of the California Environmental Quality Act (CEQA) Guidelines require public agencies to establish monitoring or reporting programs for projects approved by a public agency whenever approval involves the adoption of either a mitigated negative declaration or specified environmental findings related to environmental impact reports.

This is the Mitigation Monitoring and Reporting Program (MMRP) for the Inglewood Transit Connector (ITC, or Project). The intent of the MMRP is to ensure the successful implementation of the mitigation measures identified in the Final Environmental Impact Report (Final EIR) for the Project.

### 4.2 MITIGATION MEASURES

The mitigation measures from the Final EIR are assigned the same title as in the Final EIR. The MMRP describes the actions to be taken to implement each mitigation measure, the timing of these actions, the entities responsible for implementing and monitoring the actions, and, where appropriate, the entities responsible for ensuring that reporting responsibilities are carried out. The mitigation measures identify the Project as the “Proposed Project”; this same terminology is used here in order to ensure that the measures in this MMRP are consistent with those identified in the Final EIR.

In some instances, mitigation measures require a monitor or community liaison to be retained or designated. In those instances, the person or entity designated to perform this task shall be identified to the City, and the City will review that person or entity’s qualifications to confirm that the designated party has the requisite expertise or qualifications.

The MMRP also includes a table identifying “Project Design Features” (PDFs). This information is included for convenience and comprehensiveness. These PDFs are not “mitigation measures” as defined by CEQA. PDFs consist of elements or features that have been incorporated into the Project that may reduce the environmental effects of the Project. These PDFs are included in a separate table in order to ensure that these features are implemented.

### 4.3 MMRP COMPONENTS

The components of the attached tables, which contain applicable mitigation measures and project design features, are addressed briefly, below:

- **Impact:** This column summarizes the impact stated in the Draft EIR, as revised in the Final EIR.

- **Mitigation Measure:** All mitigation measures identified in the Draft EIR, as revised in the Final EIR, are presented and titled accordingly.
- **Implementing Party:** The column entitled “Implementing Party” identifies the entity that will undertake the required action. The Implementing Party is most often the Contractor/Operator, who will be responsible for the design, construction or operation of each site, phase, or component of the Project. The Contractor/Operator responsible for undertaking a required action may include the owner or operator of the Project component, as appropriate. In some instances, the required action will or should be undertaken by another party. This column therefore provides clarity regarding the entity that is primarily responsible for carrying out the action.
- **Monitoring Party:** This column identifies the specific party responsible for monitoring. The City of Inglewood (the City) is primarily responsible for monitoring that mitigation measures are successfully implemented. Within the City, the Public Works Department would have responsibility for monitoring some aspect of the overall project. The City of Inglewood proposed the formation of a joint powers authority (JPA) with the Los Angeles County Metropolitan Transportation Authority (Metro) to implement and operate the ITC Project. In March 2021, Metro’s Board approved and voted to form the JPA. Upon formation, the JPA would assume responsibility for oversight of the Project. Therefore, although the JPA does not yet exist, it has been added as a Monitoring Party where the JPA would have that role once the JPA is constituted. Other entities, such as the DBFOM Contractor, or other agencies, such as the Los Angeles Regional Water Quality Control Board, may also be responsible for monitoring the implementation of mitigation measures.

The department within the City who is identified as a monitoring party includes the: (1) the Public Works Department, which helps to plan, design, inspect, and administer contracts for capital infrastructure construction and facility improvements projects (Engineering Division); manage the City’s municipal solid waste services (Environmental Services Division); and assures that City transportation improvements and systems are functional and safe (Transportation & Traffic Division).

- **Timing:** Implementation of the action must occur prior to or during some part of project approval, project design or construction, or during ongoing project operations. The timing for each measure is identified in this column.
- **Notes:** Certain measures identify reporting responsibility. In those instances, the MMRP identifies the party that must prepare a report so that the monitoring party can confirm that the required action(s) have been implemented. This column also notes where the mitigation measure will be enforced in part by another agency or provides additional information that provide clarity concerning how the measure will be carried out.
- **Acronyms:** The MMRP uses various acronyms to refer to various City Departments or other agencies or entities. In some instances, the full name of the department or agency is used. The following agency or department acronyms are used throughout the MMRP:

<b>Name of Department or Agency</b>	<b>Acronym</b>
<b><i>City of Inglewood, Public Works Department</i></b>	
Engineering Division	DPW-Engineering Division
Environmental Services Division	DPW-Environmental Services Division
Transportation & Traffic Division	DPW-Transportation & Traffic Division
<b><i>South Coast Air Quality Management District</i></b>	<b><i>SCAQMD</i></b>
<b><i>State of California, Department of Transportation</i></b>	<b><i>Caltrans</i></b>
<b>Other acronyms:</b>	
ATS	Automated Transit System
CCP	Construction Commitment Plan
JPA	Joint Powers Authority
PDF	Project Design Feature

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
<b>4.2 Air Quality</b>					
<b>Impact AQ-1:</b> Conflict with or obstruct implementation of the applicable air quality plan.	<b>MM AQ-1: PDF AQ-1</b> shall be implemented during construction, as described in Project Design Features table below.	Contractor/ Operator	JPA/DPW	See <b>PDF AQ-1</b> in Project Design Features table below.	See <b>PDF AQ-1</b> in Project Design Features table below.
<hr/>					
<b>Impact AQ-2:</b> Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.					
<hr/>					
<b>Impact AQ-3:</b> Expose sensitive receptors to substantial pollutant concentrations.					
<hr/>					
<b>4.3 Biology Resources</b>					
<b>Impact BIO-1:</b> Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.	<p><b>BIO-1 Conservation of Faunal Resources: Nesting Birds/Raptors:</b> The City shall require demolition and construction contractors to implement the following measures:</p> <ul style="list-style-type: none"> <li>• 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 (6) months until the completion of construction activities, as specified below.</li> </ul> <p>Nesting bird survey shall include:</p>	Contractor/ Operator	JPA/DPW	Prior to tree removal activities that would occur between January 1 through September 1 for raptors and March 1 to September 15 for nesting birds, preconstruction surveys would be conducted by a qualified biologist no earlier than 30 days prior to the commencement of	Measure applies for tree removal activities occurring between January 1 through September 1 for raptors and March 1 to September 15 for nesting birds. Biologist retained by Contractor/Operator subject to review and approval by City to confirm that biologist is qualified to perform survey.

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<ul style="list-style-type: none"> <li data-bbox="617 266 1066 716">– Prior to any demolition and/or construction, and a least every six (6) 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 no more than 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.</li> <li data-bbox="617 732 1066 1403">– Prior to any vegetation disturbance between March 1 and September 15, and a least every six (6) 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 demolitions areas and within 300 feet of all disturbance areas. 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</li> </ul>			<p data-bbox="1415 266 1640 716">construction activities. If active nests are found during preconstruction surveys, the qualified biologist shall utilize the appropriate buffer (300 feet for nesting birds and 500 feet for raptors) to avoid the nest and the City shall be notified.</p> <p data-bbox="1415 724 1640 911">The requirement to establish a buffer applies if active nests or raptors are found during construction.</p>	<p data-bbox="1667 266 1904 586">Biologist to prepare report of pre-construction survey, and to submit report to ECDD-Planning Division. Biologist shall notify ECDD-Planning Division if active nests are found.</p>

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>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 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.</p> <ul style="list-style-type: none"> <li data-bbox="617 1214 1066 1404">– During the year prior to demolition and/or construction, a survey shall be conducted by a qualified biologist for bat habitat areas within the construction footprint of the proposed Project between March 1</li> </ul>				

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>and September 30 and at least every six (6) months until the completion of construction activities. The areas shall be characterized as to their potential for supporting a bat maternal colony or nursery site. The survey shall include all trees and any manmade structures, or other bat habitat areas that could be affected. If bat maternal colony or nursery sites are identified, then these areas shall be avoided by demolition and/or construction during the bat breeding season, from March 1 through September 30. Each tree or structure supporting an active maternity roost shall be inspected a week prior to disturbance to determine the presence or absence of roosting bats.</p> <ul style="list-style-type: none"> <li>The biologist shall submit weekly reports to the City's Parks, Recreation and Library Services Director, or designated representative, regarding the results of the nesting bird surveys.</li> </ul>				

**4.4 Cultural Resources**

<p><b>Impact CUL-2:</b> Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?</p>	<p>See <b>MM TCR-1 to MM TCR-4.</b></p>	<p>See <b>MM TCR-1 to MM TCR-4</b></p>	<p>JPA and see <b>MM TCR-1 to MM TCR-4.</b></p>	<p>See <b>MM TCR-1 to MM TCR-4.</b></p>	<p>See <b>MM TCR-1 to MM TCR-4.</b></p>
<p><b>Impact CUL-3:</b> Disturb any human remains, including those interred outside of</p>	<p>See <b>MM TCR-1, MM TCR-3, MM TCR-5.</b></p>	<p>See <b>MM TCR-1, MM TCR-3, MM</b></p>	<p>JPA and see <b>MM TCR-1, MM TCR-3,</b></p>	<p>See <b>MM TCR-1, MM TCR-3, MM TCR-5.</b></p>	<p>See <b>MM TCR-1, MM TCR-3, MM TCR-5.</b></p>

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
formal cemeteries.		TCR-5.	MM TCR-5.		

**4.6 Geology**

**Impact GEO-1:** Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42.

**MM GEO-1:** The proposed Project shall be designed to accommodate fault rupture where present in accordance with applicable Caltrans guidelines, including Memo to Designers 20-8 (Analysis of Ordinary Bridges that Cross Faults), dated January 2013; and Memo to Designers 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 or accommodate the fault rupture hazard where present with refinement of station and ATS Guideway placement worked into final design as needed based on project specific geologic surveys, recommendations and criteria. As noted in Caltrans Memorandum to Designers (MTD) 20-8, bridge type structures, such as the ATS Guideway, must be designed for the displacement demand resulting from a static fault offset, the dynamic response due to ground shaking, and any other fault-induced hazards (e.g., creep) that may occur at the site. Caltrans MTD 20-8 provides a method for obtaining the displacements at columns and abutments at fault crossings; all the

Contractor/  
Operator

JPA/DPW

ATS system facilities designed in accordance with applicable Caltrans guidelines shall be shown on building plans for the ATS, prior to the issuance of building permits for the ATS.

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>requirements must also be followed. Adequate bearing seats must be provided so the superstructure can slide at the abutment, bent, or hinge seats without falling.</p>				
	<p><b>MM GEO-2:</b> During site investigation 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 in the Project area to support adjustments to the proposed Project’s design.</p> <p>The investigation shall include a supplemental fault investigation conducted along the trace of the Townsite fault to further refine the location of the feature and assess the activity level where it crosses the proposed ATS alignment and any stations.</p> <p>The investigation shall include the following surface and subsurface methods:</p> <ul style="list-style-type: none"> <li>• Aerial photograph analysis;</li> <li>• Geophysical surveys (e.g., seismic reflection and/or seismic refraction) to refine the identified geophysical anomaly associated with the Townsite fault and inform subsequent targeted fault hazard exploration as necessary;</li> <li>• Targeted fault trenching based on the findings of additional geophysical studies to locate the potential Townsite fault where it crosses the proposed ITC alignment; and</li> <li>• Exploratory drilling and sampling (e.g.,</li> </ul>	Contractor/ Operator	JPA/DPW	<p>A supplemental fault investigation will be prepared prior to the issuance of any permit by the City for ground-disturbing activity for each site or phase of the Project, as applicable.</p> <p>ATS system facilities designed in accordance with applicable Caltrans guidelines shall be shown on building plans for the ATS, prior to the issuance of building permits for the ATS.</p>	Necessary column placements and ATS facility design would be adjusted on an as-needed basis based on supplemental fault investigation results.

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>hollow stem auger and CPT borings), as necessary, if definitive information regarding the trace of the Townsite fault cannot be adequately delineated across the proposed ITC alignment within the limits of fault trenching.</p> <p>Based on the results of these investigations, column placements and facility designs would be adjusted to accommodate geologic conditions identified. Further, the 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). Stations/structures shall be located to avoid the fault rupture hazard where present.</p> <p>Columns and foundations for the guideway and stations, as well as any other ATS facilities shall be located to avoid the fault rupture hazard where present. The design fault offset where evaluating features crossing the ATS guideway alignment shall be determined as the larger of the:</p> <ul style="list-style-type: none"> <li>• Deterministically derived average displacement.</li> <li>• Probabilistically derived displacement consistent with a 5 percent in 50-years probability of exceedance.</li> </ul> <p>Probabilistic procedures shall follow those outlined in Abrahamson [2008] and Petersen et al., [2011] of the <i>Fault Rupture Hazard Evaluation (Appendix K.1)</i>. These procedures allow for evaluation of offset based on the</p>				

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>results of field investigation. If further study of the fault rupture is conducted, then procedures as outlined in CGS Note 49<sup>1</sup> shall be followed.</p>				
	<p><b>MM GEO-3:</b> 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 <i>the Development of Seismic Design Criteria in Support of Draft EIR - Seismic Design Criteria (Appendix K.2)</i> shall be considered applicable for both aerial guideway and ancillary structures within each segment of the alignment under the guideway and each station.</p> <p>Probabilistic procedures also shall follow those outlined Caltrans memo to Designers 20-10 -Fault Rupture, dated January 2013.</p>	Contractor/ Operator	JPA/DPW	ATS system facilities designed in accordance with applicable Caltrans guidelines shall be shown on building plans for the ATS, prior to the issuance of building permits for the ATS	
<p><b>Impact GEO-3:</b> Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</p>	<p><b>MM GEO-4:</b> A qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (SVP, 2010) shall be retained by the Contractor/Operator and approved by the City prior to the approval of grading permits. The qualified paleontologist shall:</p> <p>a) Prepare, design, and implement a</p>	Contractor/ Operator	JPA/DPW	a) A monitoring and mitigation plan shall be prepared and designed prior to issuance of any permits for ground-	a) ECDD-Building Safety Division to review and approve designated paleontologist to confirm that designee has

1 California Geological Survey, Note 49: Guidelines for Evaluating the Hazard of Surface Fault Rupture, <https://www.conservation.ca.gov/cgs/Documents/Publications/CGS-Notes/CGS-Note-49.pdf>

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>monitoring and mitigation program for the Project consistent with Society of Vertebrate Paleontology Guidelines. The Plan 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 fossil remains can be salvaged in a timely manner), fossil treatment, procurement, and reporting. The Plan monitoring and mitigation program shall be prepared and approved by the City prior to the issuance of the first grading permit. If the qualified paleontologist determines that the Project-related grading and excavation activity would not affect Older Quaternary Alluvium, then no further mitigation is required.</p> <p>b) Conduct construction worker paleontological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.) and would present the Plan as outlined in (a). In the event construction crews are phased or rotated, additional training shall be conducted for new construction personnel working on ground-disturbing activities. The training session shall provide instruction on the recognition of the types of paleontological resources</p>			<p>disturbing activity by the City for each site or phase of the Project, as applicable.</p> <p>b) The monitoring and mitigation plan shall be implemented for the duration of Project construction.</p> <p>Paleontological resources sensitivity training shall be conducted prior to the start of ground disturbing activities; additional training shall be conducted for new construction personnel during construction, as needed.</p> <p>c) Paleontological resources monitoring shall be conducted during grading,</p>	<p>appropriate qualifications. MMP to be submitted and approved by ECDD-Building Safety Division to confirm that requirements of Mitigation Measure GEO-4(a) have been met</p> <p>b) Paleontologist to retain documentation that construction personnel have attended training; documentation to be made available to ECDD-Building Safety Division upon request</p>

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>that could be encountered within the Project area and the procedures to be followed if they are found. Documentation shall be retained by the qualified paleontologist demonstrating that the appropriate construction personnel attended the training.</p> <p>c) Direct the performance of paleontological resources monitoring by a qualified paleontological monitor (meeting the standards of the SVP, 2010). Paleontological resources monitoring shall be conducted pursuant to the monitoring and mitigation program developed under (a). Monitoring activities may be altered or ceased if determined adequate by the qualified paleontologist. Monitors shall have the authority to and shall temporarily halt or divert work away from exposed fossils or potential fossils and establish a 50-foot radius temporarily halting work around the find. Monitors shall prepare daily logs detailing the types of ground disturbing activities and soils observed, and any discoveries.</p> <p>d) If fossils are encountered, determine their significance, and, if significant, supervise their collection for curation. Any fossils collected during Project-related excavations, and determined to be significant by the qualified paleontologist, shall be prepared to the point of identification and curated into an accredited repository with retrievable</p>			<p>pursuant to the monitoring and mitigation program and as directed by qualified paleontologist.</p> <p>Qualified paleontologist shall maintain daily logs on an on-going basis for the duration of ground disturbing activities.</p> <p>Should construction activities be ceased due to discovery of fossils, the City shall be notified.</p> <p>d) If fossils are encountered during ground disturbing activities, their significance shall be determined and, if required, delivered to an</p>	<p>e) Final monitoring report submitted to the City within 90 days of completion of excavation and ground-disturbing</p>

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>storage.</p> <p>e) Prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the paleontological monitoring. If there are significant discoveries, fossil locality information and final disposition shall be included with the final report which would be submitted to the appropriate repository 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 could affect Older Quaternary Alluvium.</p>			<p>accredited repository.</p> <p>e) A final monitoring and mitigation report shall be submitted within 90 days of completion of excavation and other ground disturbing activities.</p>	<p>activities</p>

**4.13 Tribal**

<p><b>Impact TCR-1:</b> Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <p>i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in</p>	<p><b>MM TCR-1: Retention of a Tribal Cultural Resources Monitor/Consultant.</b> Prior to the commencement of any ground disturbing activity at the Project area, the contractor 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</p>	Contractor/ Operator	JPA/DPW	<p>Archaeological and Native American monitors shall be retained prior to issuance of permits for any ground disturbing activity. Monitoring shall occur for the duration of ground disturbing activities, as required.</p> <p>In the event of the discovery of any archaeological materials during construction, work shall immediately</p>	<p>Preservation in place is considered infeasible if approved geotechnical, grading and/or structural plans, and/or building code requirements preclude preservation in place.</p>
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<p>Public Resources Code section 5020.1(k); or</p> <p>ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>	<p>designated Monitor. A copy of the executed contract shall be submitted to the City’s ECDD-Building Safety Division prior to the issuance of any permit necessary to commence a ground-disturbing activity. The Tribal 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 Tribal 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 area are completed, or when the Tribal Representatives and Tribal Monitor have indicated that all upcoming ground-disturbing activities at the Project area 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 Tribal monitor approved by the Consulting Tribe. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic</p>	<p>cease and the City shall be notified of the discovery. Construction shall resume once the qualified archaeologist has made a determination on the significance of the discovered resource(s). If historical resources or unique archaeological resources are discovered, avoidance and preservation measures would be implemented.</p> <p>A Cultural Resources Treatment Plan shall be required during construction if data recovery through excavation is the only feasible mitigation available.</p> <p>During construction, if the resources are identified as Native American, the qualified archaeologist and Contractor/Operator shall consult with</p>
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Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>purposes. If human remains and/or grave goods are discovered or recognized at the Project area, all ground disturbance shall immediately cease, and the county coroner shall be notified per Public Resources Code Section 5097.98, and Health &amp; 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 area 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</p>			<p>appropriate Native American representatives.</p> <p>A final monitoring and mitigation report shall be submitted within 90 days of completion of excavation and other ground disturbing activities that require monitoring.</p>	

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>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.</p> <p><b>MM TCR-4</b> and <b>MM TCR-5</b> will supplement <b>MM TCR-1</b>.</p>				
	<p><b>MM TCR-2: Monitoring and Mitigation Plan.</b> Prepare, design, and implement a monitoring and mitigation program for the Project. The Plan 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 Plan shall be prepared and approved by a qualified archaeologist prior to the issuance of the first grading permit.</p>	Contractor/ Operator	JPA/DPW	A Monitoring and Mitigation Plan will be prepared and designed prior to the issuance of any permit by the City for ground-disturbing activity for each site or phase of the Project, as applicable. The approved Monitoring and Mitigation Plan shall be implemented for the duration of Project construction.	Qualified archaeologist retained by Contractor/Operator shall be subject to review/ approval by ECDD-Building Safety Division to confirm designee’s qualifications ECDD-Building Safety Division to review Monitoring and Mitigation Plan to confirm that the plan meets the requirements of this mitigation measure.
	<p><b>MM TCR-3: Cultural Resources Sensitivity Training.</b> The qualified archaeologist and Native American Monitor shall conduct construction-worker archaeological resources sensitivity training at the Project</p>	Contractor/ Operator	JPA/DPW	A Cultural Resources Sensitivity Training shall be conducted prior to the start of ground disturbing activities; additional	

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.) and will present the Plan as outlined in (a), 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.</p>			<p>training shall be conducted for new construction personnel during construction, as needed.</p>	
	<p><b>MM TCR-4: Archaeological and Native American Monitoring.</b> 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 Plan. If, after advanced notice, the Native American representative declines, is unable, or does not respond to the notice, construction can proceed under supervision</p>	<p>Contractor/ Operator</p>	<p>JPA/DPW</p>		

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>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.</p> <ol style="list-style-type: none"> <li data-bbox="564 634 1056 1146">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 project applicant regarding recommendation for treatment and ultimate disposition of the resource(s).</li> <li data-bbox="564 1167 1056 1421">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,</li> </ol>				

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement.</p> <p>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 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 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</p>				

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>or historical society in the area for educational purposes.</p> <p>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.</p> <p>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 applicant. The final monitoring report shall be submitted to the applicant within 90 days of completion of excavation and other ground disturbing activities that require monitoring.</p>				
	<p><b>MM TCR-5: Inadvertent Discoveries Related to Human Remains.</b></p> <p>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</p>	<p>Contractor/ Operator</p>	<p>JPA/DPW</p>		

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>County Coroner shall be contacted in accordance with PRC Section 5097.98<sup>2</sup> and Health and Safety Code Section 7050.5.<sup>3</sup> Additionally, the contractor shall notify the City, and the tribal cultural resources monitor and archaeological monitor.</p> <p>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.</p> <p>No further excavation or disturbance of the discovery or any nearby area reasonably suspected to overlie adjacent remains (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</p>				

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- 2 NAGPRA, Title 43. Public Lands: Interior, Subtitle A. Office of the Secretary of the Interior, Part 10. Native American Graves Protection and Reparation Regulations, § 5097.98 – Notification of discovery of Native American human remains, descendants; disposition of human remains and associated grave goods.
  - 3 California / Health and Safety Code - HSC / CHAPTER 2. General Provisions [7050.5. - 7055.] / Section 7050.5.

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>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.</p> <p>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.</p> <p>If the Tribe is designated MLD, the following standards shall apply and the following requirements and treatment measures shall be implemented.</p> <p>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</p>				

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>human remains can also be considered as associated funerary objects.</p> <p>Prior to the continuation of ground disturbing activities, the landowner 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:</p> <p><i>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.</i></p> <p>If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. The Tribe shall approve additional types of documentation for data recovery purposes. Cremations must either be removed in bulk or by means as necessary to ensure completely recovery of all material. If</p>				

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>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.</p> <p>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.</p> <p>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</p>				

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	<p>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.</p>				
<b>4.14 Utilities</b>					
<p><b>Impact U-1:</b> Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.</p>	<p><b>MM UT-1:</b> Prior to the award of the DBFOM contract, and start of any demolition or construction activities, the City or DBFOM shall be responsible 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 proposed Project’s guideway and station foundations.</p> <p>Based on the information from the field investigations, the DBFOM contractor shall be responsible for confirming the location of existing utilities and coordinating with the appropriate utility owners/operators to determine specific set back requirements for each utility line and the need for any</p>	<p>City, Contractor/ Operator</p>	<p>JPA/DPW- Engineering Division</p>	<p>Existing utilities potentially affected by the Project to be identified by the City prior to award of contract and issuance of any construction permit.</p>	

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timing	Notes
	stabilization for protection in place or relocation measures.				
	<b>MM UT-2:</b> Prior to the award of the DBFOM contract, and start of construction, the City shall contact Southern California Edison (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 proposed Project’s 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.	City, Contractor/ Operator	JPA/DPW- Engineering Division/SC E	An updated system Distribution Study shall be prepared and approved by the City and SCE prior to award of contract and issuance of any construction permit.	ECDD-Planning Division to confirm that reports have been submitted and approved by SCE.

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<b>4.1 Aesthetics</b>				
<p><b>PDF AES-1 Construction (CCP)</b></p> <p>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:</p> <ul style="list-style-type: none"> <li>• Temporary lighting will be limited to the amount necessary to safely perform the required work and will 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.</li> <li>• Light trespass shall not exceed one foot-candle above ambient light level as measured at any adjacent residential and transient properties.</li> <li>• Construction night lighting shall be shielded to prevent a direct view of the light sources from residential properties with a property boundary that is within 150 feet of the construction site.</li> <li>• Temporary sidewalks and any sidewalk adjacent to construction activities shall be illuminated to City Standards to protect public safety.</li> </ul> <p>To minimize the visual effects of construction the following measures shall be implemented:</p> <ul style="list-style-type: none"> <li>• Visually obtrusive erosion control devices, such as silt fences, plastic ground cover, and straw bales should be removed as</li> </ul>	Contractor/ Operator	JPA/DPW	Ongoing during construction. Adjacent residences within 500 feet of the Project shall be notified prior to the issuance of any grading or ground-disturbing activity for any phase of the Project.	

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>soon as the area is stabilized.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• When not in use or being staged, heavy equipment shall be located as far as practicable from residential areas, businesses and pedestrian pathways.</li> </ul>				
<p><b>PDF AES-2 Tree Replacement (CCP)</b></p> <p>A Tree Removal and Replacement Plan will 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:</p> <ul style="list-style-type: none"> <li>• Tree removal and replacement shall comply with the City of Inglewood Municipal Code and the Design Guidelines.</li> <li>• Removal of existing healthy and flourishing trees will be avoided where feasible.</li> <li>• 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.</li> <li>• New permanent replacement palm trees shall be a minimum of 20 feet in height.</li> <li>• 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.</li> </ul>	<p>Project Task Force, Contractor/ Operator</p>	<p>JPA/DPW- Environmental Services Division</p>		<p>Prior to the issuance of a grading permit or ground-disturbing activity, a tree permit shall be obtained. All replacement trees shall be maintained for a minimum of 3 years during operation and shall be inspected after 1 year. Contractor must replace trees within six months of restoration and completion of Project portions.</p>

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<ul style="list-style-type: none"> <li>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.</li> <li>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 will 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.</li> </ul>				
<p><b>PDF AES-3 Lighting (Design Guidelines)</b></p> <p><u>Station Design</u></p> <ul style="list-style-type: none"> <li>Station canopies will have indirect accent lighting.</li> <li>Lighting will clearly highlight pedestrian paths including those to stairs, escalators, and elevators.</li> <li>Accent and functional lighting will be strategically placed to minimize spillover.</li> <li>Accent and functional lighting controls will be programmable, and sensor controlled to allow for energy efficiency and various settings such as daytime, nighttime, and event lighting.</li> </ul>	Contractor/ Operator	JPA/DPW- Engineering Division	Lighting design features shall be shown on building plans for the ATS, prior to the issuance of building permits for the ATS.	

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<u>Guideway And Support Structure Design</u>				
<ul style="list-style-type: none"> <li>• Where provided, guideway indirect accent lighting will complement station lighting design.</li> <li>• Light fixtures will be concealed or minimally visible.</li> <li>• Accent and functional lighting will be strategically placed to minimize spillover.</li> <li>• Code required lighting along the guideway will be designed to minimize visibility from the ground level.</li> <li>• Street lighting will be supplemented as needed to provide a consistent light level on the sidewalk and roadway along the project alignment</li> </ul>				
<u>Maintenance And Storage Facility</u>				
<ul style="list-style-type: none"> <li>• Where provided, functional lighting will be placed to minimize spillover</li> <li>• Building entrances will be well lit.</li> <li>• Lighting will clearly highlight pedestrian paths including those to ramps, stairs, escalators, and elevators</li> <li>• Public uses on the ground plane of the MSF Site including any covered parking areas will be well lit with particular attention paid to the comfort and safety of the public.</li> </ul>				
<u>Elevated Passenger Walkway</u>				
<ul style="list-style-type: none"> <li>• Where provided, functional lighting will be placed to minimize spillover.</li> <li>• Overall lighting design will not interfere with roadway traffic below.</li> <li>• Accent lighting will complement station lighting design.</li> <li>• Accent and general lighting controls will be programmable and sensor controlled to allow for daytime, nighttime, and event settings.</li> </ul>				

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p><b>PDF AES-4 Tree Placement (Design Guidelines)</b></p> <ul style="list-style-type: none"> <li>• An arborist report surveying the condition and extents of all existing trees in the Project area will 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.</li> <li>• Existing flourishing trees (as identified in the arborist report) will remain, where feasible.</li> <li>• An Approved Plant Palette based on the City’s approved street tree list will be used as a basis for all sections of new trees.</li> <li>• The quantity and species of existing trees removed by the ITC Project will be replaced in accordance with the City’s current landscape guidelines.</li> <li>• Protected species in the Inglewood Municipal Code, Tree Preservation will remain.</li> <li>• City of Inglewood guidelines for tree spacing will be followed, considering species of trees and the desired canopy coverage.</li> <li>• Trees will be planted on both sides of the roadway where feasible.</li> <li>• Trees will be positioned at regular intervals relative to the guideway column supports to create a consistent rhythm.</li> <li>• On Market Street, trees will be planted at a rhythm and scale to create a continuous visual canopy over the pedestrian realm, where feasible.</li> <li>• On Manchester Boulevard, trees will be planted at a rhythm consistent with the street trees east and west of the Project, in alignment with the shape of the roadway.</li> <li>• On Prairie Avenue, trees on the east side will continue the</li> </ul>	<p>Contractor/ Operator</p>	<p>JPA/ DPW- Engineering Division</p>	<p>Tree placement locations shall be shown on building plans for the ATS, prior to the issuance of building permits for the ATS.</p>	<p>The arborist shall be certified by the International Society for Arboriculture (ISA).</p>

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>stately rhythm from the Inglewood Cemetery north of Manchester Boulevard. Trees on the west side will be spaced to match the rhythm of the east side and the guideway support structure to the extent feasible.</p>				
<p><b>PDF AES-5 Signage (Design Guidelines)</b></p> <ul style="list-style-type: none"> <li>Physical Non-Digital Signage incorporated into the Project will have a distinct visual graphic identity that is consistent across all physical design elements of the project</li> <li>All signage will be approved by City of Inglewood and the Authority Having Jurisdiction (AHJ).</li> <li>Existing signage along the entire ITC alignment, which are affected, will be replaced, along with its infrastructure, and will meet its originally intended design intent and function.</li> <li>Signage replaced that originated on private property will be approved by the City of Inglewood and the sign/property owner.</li> </ul>	Contractor/ Operator	JPA/ DPW- Engineering Division/AHJ	Signage shall be shown on building plans for the ATS, prior to the issuance of building permits for the ATS.	
<b>4.2 Air Quality</b>				
<p><b>PDF AQ-1 Construction Air Quality Program (CCP)</b></p> <p>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.</p>	Contractor/ Operator	JPA/DPW	Construction equipment requirements for equipment operating at the Project Site, as well as the construction protocols shall be included in applicable bid documents prior to seeking bids for construction. A comprehensive inventory of all off-road construction equipment for activities being permitted shall be made available to SCAQMD prior to issuance of any permits for construction activities by the City of	

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>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.</p> <p>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.</p> <ul style="list-style-type: none"> <li>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</li> </ul>			<p>Inglewood for each site or phase, as applicable.</p> <p>Construction equipment features for equipment operating at the Project Site, as well as the construction protocols shall be implemented during any ground disturbing activities and construction activities on an on-going basis. Periodic reporting and provision of written construction documents by the Contractor and compliance inspections by the City would be required on an ongoing basis during construction.</p>	

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>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.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>				

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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</li> </ul>				

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>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.</p> <ul style="list-style-type: none"> <li>• Require the use of electric or alternatively fueled (e.g., natural gas) sweepers with high-efficiency particulate air (HEPA) filters.</li> <li>• 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.</li> <li>• Dust shall be controlled per local ordinances. The Contractor shall be responsible for excessive dust or construction debris that results in impacts to adjacent residences or private vehicles, including taking responsibility for clean-up and addressing complaints brought to the project.</li> <li>• All trucks carrying fill materials, debris, or similar materials shall secure and cover loads to prevent dust or debris while travelling on public right of ways.</li> <li>• All trucks removing materials from the site will be loaded within the site perimeter and will be required to cover loads as deemed necessary for dust control .</li> <li>• Material stockpiles and construction area surfaces shall be covered and/or watered as needed to prevent dust at designated construction areas.</li> <li>• 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.</li> <li>• To the extent feasible, allow construction employees to</li> </ul>				

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>commute during off-peak hours.</p> <ul style="list-style-type: none"> <li>• Make access available for on-site lunch trucks during construction, as feasible, to minimize off-site construction employee vehicle trips.</li> <li>• Every effort shall be made to utilize grid-based electric power at any construction site, where feasible.</li> <li>• Contractors shall maintain and operate construction equipment to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer’s specifications and documentation demonstrating proper maintenance, in accordance with the manufacturer’s specifications, shall be maintained on site. Tampering with construction equipment to increase horsepower or to defeat emission control devices must be prohibited.</li> <li>• Require in all applicable bid documents, purchase orders, and contracts of the requirement to notify all construction vendors, contractors, and/or haul truck operators that vehicle and construction equipment idling time will be limited to no longer than five minutes, consistent with the CARB’s policy. For any idling that is expected to take longer than five minutes, the engine should be shut off. Notify construction vendors, contractors, and/or haul truck operators of these idling requirements at the time that the purchase order is issued and again when vehicles enter the Project area. To further ensure that drivers understand the vehicle idling requirement, post signs at the proposed Project entry gates and throughout the Project alignment, where appropriate, stating that idling longer than five minutes is not permitted.</li> </ul>				
<b>4.4 Cultural Resources</b>				
<b>PDF CUL-1 Historic Resources (Design Guidelines)</b>	Contractor/	JPA/ DPW- Engineering	Guideway and support column design, elevation, and distance	

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>The final Project design must consider design variables (elevation of guideway, width of guideway, distance of the guideway from the resources, and the dimensions, placement, and spacing of support columns) and resource variables (building’s height, scale, number of street-facing facades, width of primary façade, front setback, project elements overhanging the sidewalk, and viewpoints from which the resource can best be discerned in its entirety). The final Project design shall ensure minimal impacts to the setting of historical resources, and little or no visual obstruction of the resource’s street-facing façades from the optimal viewpoints. In order to meet these performance-based standards, the following Project Design Features shall be incorporated into the final Project design:</p> <ul style="list-style-type: none"> <li>• The guideway’s elevation and distance from the façade of the historical resource will be sufficient for the guideway to visually clear the top of the historical resources’ street-facing façade(s) when viewed from the optimal viewpoints. The final Project design is expected to achieve no visual obstruction of any of the identified historical resources from the guideway.</li> <li>• At the former Fox Theatre, and for 100 feet on either side of the resource, the guideway elevation (measured from the ground plane to the underside of the guideway structure) will be a minimum of 52 feet from grade in order to achieve unobstructed views of this resource, including its monumental sign pylon.</li> <li>• The dimensions, placement, and spacing of the guideway support columns will be such that the obstruction of views of the historical resources’ street-facing façade(s) when viewed from the optimal viewpoints will be minimized. For five of the identified historical resources—Holy Faith Episcopal Church, former United Bank of California (now Broadway Federal Bank), former Fox Theatre, Professional Building, and Inglewood Park Cemetery—the final Project design is</li> </ul>	Operator	Division	from known resources shall be shown on building plans for the ATS, prior to the issuance of building permits for the ATS.	

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>expected to completely avoid visual obstructions from support columns.</p> <ul style="list-style-type: none"> <li>For five of the historical resources—the former Bank of Inglewood, former J.C. Penney, Bank of America, the Forum, and Lighthouse McCormick Mortuary Mortuary—views that are completely unobstructed by support columns are not necessary for the resource to convey its significance. A small portion of the resources’ primary façades will be intermittently obscured depending on the position of the viewer. However, due to the scale and/or setback of these resources, their primary façades will remain readily discernable.</li> </ul>				

**4.5 Energy**

<p><b>PDF ENERGY-1 (Design Guidelines)</b></p> <ul style="list-style-type: none"> <li><u>Energy Efficiency</u> - Where California Energy Efficiency Standards apply, the project should be more energy efficient than allowed. For energy-using equipment not governed by California Energy Efficiency Standards, best available energy efficient technologies should be used. Advanced commissioning of building systems should be conducted to ensure systems are operating as designed.</li> <li>To achieve energy use reduction, passive strategies taking advantage of the favorable local climate should be considered where feasible. The use of solar canopies as shade structures in addition to roof-mounted solar is another energy saving strategy.</li> <li><u>Water Efficiency</u> - In order to reduce excessive water consumption, the project should identify and implement appropriate opportunities to reduce or eliminate potable water use indoors and in landscape areas.</li> <li><u>Material Conservation And Resource Efficiency</u> - In order to reduce the environmental impact from the use of</li> </ul>	<p>Contractor/ Operator</p>	<p>JPA/ DPW- Engineering Division</p>	<p>Energy efficient design features shall be shown on building plans for the ATS, prior to the issuance of building permits for the ATS.</p>	
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Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>construction materials, the project should minimize the use of virgin materials. This can be accomplished by increasing the use of materials that are reused, recycled, rapidly renewable, locally sourced, and durable. In order to determine the best approach to reducing the overall environmental impact from use of materials, a life cycle assessment (LCA) could be used.</p> <ul style="list-style-type: none"> <li>• <u>Environmental Quality</u> - In order to protect and enhance the health and comfort of occupants, the project should provide a high quality, sustainable indoor environment that is designed to maximize natural daylighting and views of the outdoors where feasible. Indoor spaces should use high efficiency air filtration and should create a comfortable indoor acoustical environment. Materials and systems should be selected that will provide for a healthy indoor environment.</li> </ul>				

**4.8 Hazards and Hazardous Materials**

<p><b>PDF HAZ-1 Hazardous Materials Program (CCP)</b></p> <p>The following practices will be followed during construction to address the potential for encountering hazardous materials during construction of the Project.</p> <ul style="list-style-type: none"> <li>• <u>Building Demolition Plan</u> – Prior to any demolition occurring, conduct an evaluation of all buildings built prior to 1980 to be demolished to identify the presence of asbestos containing materials (ACMs) and lead-based paint (LBP). Remediation shall be implemented in accordance with the recommendations of these evaluations to ensure that no ACMs or LBP remain present and to ensure ACMs and LBP are removed to levels established for public safety.</li> <li>• <u>Hazardous Materials Contingency Plan</u> – Prior to construction, prepare a plan addressing the potential for discovery of unidentified underground storage tanks (USTs),</li> </ul>	<p>Contractor/ Operator</p>	<p>JPA/DPW</p>	<p>A Building Demolition Plan, Hazardous Materials Contingency Plan, Soil Management Plan, and Health and Safety Plan shall be prepared and submitted prior to issuance of any permits by the City of Inglewood for ground disturbing activities for each site or phase of the Project, as applicable.</p> <p>Implementation of the plans shall be on-going for the duration of construction.</p> <p>If unidentified or suspected</p>	<p>ECDD-Building Safety to confirm that Contractor/Operator has submitted SMP, and that appropriate regulatory agency has approved it</p>
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Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>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 materials encountered during construction are removed to levels established for public safety.</p> <ul style="list-style-type: none"> <li>• <u>Soil Management Plan</u> – After final construction plans are prepared showing the lateral and vertical extent of soil excavation during construction are prepared, prepare a Soil Management Plan to 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.</li> <li>• <u>Health and Safety Plan</u> – Prior to construction, prepare a Health and Safety Plan to address the potential for exposure to the constituents of concern identified in the limited Phase II ESA.</li> <li>• <u>Utility Relocation Work</u> – All Project utility relocations in the vicinity of Kelso Elementary School shall be designed and constructed to remain within the public right-of-way and not impact school property. Relocations shall be located further away from the school as feasible and designed and constructed to current standards to assure that they create no unacceptable hazards to the school. During Project construction, any open trenches and construction equipment shall be marked and barricaded such that they are not accessible by the students or create any potential hazard to school operations. Project utility relocations or cut overs that may require disruption to normal school utility services shall be scheduled to occur outside of normal school hours with advanced notification to the School District.</li> </ul>			<p>contaminated soils or groundwater is encountered, any further ground disturbing activities shall be conducted according to a site- specific health and safety plan and the City shall be notified of this contamination.</p> <p>If contaminated soils or groundwater is encountered, ground disturbing activities shall not recommence until remediation is completed and a “no further action” letter is obtained or direction is otherwise given from the appropriate regulatory agency that construction can recommence.</p>	

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<b>4.10 Noise</b>				
<p><b>PDF-NOISE-1 Construction Noise Control Plan (CCP)</b></p> <p>A Construction Noise Control Plan shall be developed in coordination with an acoustical/vibration consultant approved by the City and 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 Federal Transit Administration (FTA)’s General Assessment Construction Noise Criteria. The following construction noise reduction measures shall be incorporated into the plan:</p> <ul style="list-style-type: none"> <li>– Install temporary noise barriers that reduce sound at receptors;</li> <li>– For any idling that is expected to take longer than five minutes, the engine shall be shut off;</li> <li>– All equipment shall be equipped with optimal muffler systems;</li> <li>– Use solar, battery powered, or hybrid equipment whenever practical;</li> <li>– Locate staging areas as far away from sensitive receptors as feasible;</li> <li>– Locate stationary noise sources as far away from sensitive receptors as feasible;</li> <li>– Enclose stationary noise sources, such as diesel-or gasoline-powered generators, with acoustical barriers where necessary and required;</li> <li>– 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.</li> </ul>	<p>Contractor/ Operator, Community Affairs Liaison</p>	<p>JPA/DPW- Engineering Division</p>	<p>A Construction Noise Control Plan shall be prepared or updated and approved prior to the issuance of any permits for construction activities by the City for each site or phase of the Project, as applicable. The approved Construction Noise Control Plan shall be implemented for the duration of Project construction.</p>	<p>Acoustical consultant retained by Contractor/Operator subject to review and approval by DPW-Engineering Division to confirm that designee has requisite expertise. The City will designate a Community Affairs Liaison to be responsible for responding within 24 hours to any local complaint or question about construction activities. A website will be established with project construction information and contact information for the Community Affairs Liaison. A toll-free phone line (available 24 hours a day) and website will be made a part of all construction notices and shall be</p>

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<ul style="list-style-type: none"> <li>– Pole power shall be utilized to the maximum extent feasible in lieu of generators.</li> <li>– 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.</li> <li>– Staging of construction material deliveries behind fencing to minimize noise emitting from idling vehicles.</li> <li>– On site-signage reminding workers to minimize noise generation.</li> <li>– When not in use or being staged, heavy equipment shall be located as far as practicable from sensitive receptors.</li> <li>– For project foundations, consider the use of drilled piles or sonic pile drivers or vibratory pile drivers instead of traditional impact pile drivers, as permitted by geological conditions.</li> <li>– Sequence noisy activities to occur during the same general time period during daytime hours to the extent practical.</li> <li>– Select quieter demolition methods where appropriate and feasible such that demolition activities can remain within the project specified noise levels.</li> </ul>				<p>posted in prominent public facing locations around the Project area and in adjacent public spaces.</p>

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<ul style="list-style-type: none"> <li>– Unless deemed infeasible for a particular construction activity, the Contractor shall utilize rubber tire earth moving equipment in lieu of track mounted earth moving equipment.</li> <li>– Construction material deliveries shall take place within designated construction staging areas as far from residential sites as practical to minimize noise impacts.</li> <li>– Provide signage at active construction sites and staging areas reminding workers, equipment operators and delivery vehicles to minimize noise levels to the extent possible.</li> <li>– Rumble strips or signage shall be provided at roadway access points into contractor laydown and staging areas to slow construction vehicles and limit vehicle noise.</li> <li>– Coordinate with Inglewood Unified School District administrators to avoid disruptive noise during school hours, including scheduling heavy equipment such as cranes, haul trucks, concrete trucks, concrete pumps, pneumatic equipment, earth moving vehicles or similar to operate outside of school hours. The City shall require that the Project's construction noise during school hours would be limited to 5 dBA Leq 1-hour above the measured ambient noise levels at Kelso School property line as identified in the RDEIR. Activities that would exceed this threshold shall be scheduled to occur outside of normal school hours or mitigated with specific mitigation measures such as temporary sound walls, sound blankets, or other sound-attenuating devices. The City shall monitor the Project's construction noise levels during school hours to assure compliance. As requested by the District, monthly noise monitoring reports on noise levels during school hours at Kelso School will be provided to the District.</li> </ul>				

In order to ensure that construction noise levels will be below the

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>established standards, the following shall be incorporated into the Plan:</p> <ul style="list-style-type: none"> <li>– 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.</li> <li>– 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: <ul style="list-style-type: none"> <li>– Halting/staggering concurrent construction activities in certain locations;</li> <li>– Reducing the speed or intensity of the of heavy-duty construction equipment being operated simultaneously.</li> <li>– Operate equipment at the lowest possible power levels.</li> <li>– Modifying equipment, such as dampening of metal surfaces or other redesign to minimize metal-to-metal impacts.</li> </ul> </li> </ul> <p>In order to ensure that acceptable noise levels are maintained at Kelso School, real time noise monitoring will be conducted at Kelso School during the school day. A noise monitor will be located at the southeast corner of Kelso</p>				

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>School on Prairie Avenue. This noise monitor will update the 1-hour Leq noise level every minute during the school day. Any time the 1-hour Leq noise level increases by 3 dBA over the ambient noise level during the school day, an alert message will be sent to the construction manager(s) and contact(s) for the contractor(s) working in the vicinity of the school to allow for adjustments to be made to the work in progress to avoid noise levels reaching or exceeding an increase of 5 dBA 1-hour Leq over ambient noise levels. A contact will also be provided to the Inglewood Unified School District and administration at Kelso School to resolve any District or Kelso School concerns with construction activities and their resulting noise levels during the school day.</p>				
<p><b>PDF NOISE-2 Construction Vibration Reduction Plan (CCP)</b></p> <p>Prior to the issuance of any demolition or construction permit for each phase of the 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 to ensure impacts from ground borne vibration are less than significant:</p> <ul style="list-style-type: none"> <li>• A Pre-Demolition and Construction Plan that includes but is not limited to: <ul style="list-style-type: none"> <li>– 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.</li> </ul> </li> </ul>	<p>Contractor/ Operator</p>	<p>JPA/DPW- Engineering Division</p>	<p>A Construction Vibration Reduction Plan shall be prepared or updated and approved prior to the issuance of any permits for construction activities by the City for each site or phase of the Project, as applicable. The approved Construction Vibration Reduction Plan shall be implemented for the duration of Project construction.</p>	<p>The City will designate a Community Affairs Liaison to be responsible for responding within 24 hours to any local complaint or question about construction activities. A website will be established with project construction information and contact information for the Community Affairs Liaison. A toll-free phone line (available 24 hours a day) and website</p>

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<ul style="list-style-type: none"> <li>– 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 project activities.</li> <li>– Crack gauges shall be installed on multiple representative cracks, particularly on sides of the building facing the Project.</li> <li>– 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 Project, and if/when levels exceed the established threshold.</li> <li>– A line and grade pre-construction survey at the affected buildings shall be conducted.</li> <li>• A Vibration Plan During Demolition and Construction that includes the following:               <ul style="list-style-type: none"> <li>– 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.</li> <li>– 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</li> </ul> </li> </ul>				<p>will be made a part of all construction notices and shall be posted in prominent public facing locations around the Project area and in adjacent public spaces.</p>

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>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.</p> <ul style="list-style-type: none"> <li>– 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.</li> <li>– 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.</li> <li>– 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.</li> <li>– Collect vibration data from receptors and report vibration levels to the Joint Powers Authority and/or the City on a daily basis. The reports shall include annotations regarding project activities as necessary to explain changes in vibration levels.</li> </ul> <ul style="list-style-type: none"> <li>• Post-Construction Reporting and Repairs: <ul style="list-style-type: none"> <li>– Provide a report to the Joint Powers Authority and/or</li> </ul> </li> </ul>				

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>the City 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 post-construction 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 Project and/or show how the 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.</p> <ul style="list-style-type: none"> <li>– 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 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.</li> <li>• To minimize the risk of potential structural and building damage: <ul style="list-style-type: none"> <li>– 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.</li> <li>– Limit the number of jackhammers operating simultaneously to one (1) piece operating within 45 feet of off-site sensitive receptors.</li> </ul> </li> </ul>				

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<ul style="list-style-type: none"> <li>– 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.</li> <li>• To minimize the risk of related to human annoyance:               <ul style="list-style-type: none"> <li>– Limit the location of pile driving to 310 feet of off-site vibration sensitive receptors.</li> <li>– Limit the location of vibratory roller to 150 feet of off-site vibration sensitive receptors.</li> <li>– Limit the location of large bulldozer to 85 feet of off-site vibration sensitive receptors.</li> <li>– Limit the location of caisson drilling to 85 feet of off-site vibration sensitive receptors.</li> <li>– Limit the location of loaded trucks to 75 feet of off-site vibration sensitive receptors.</li> <li>– Limit the location of jackhammers to 45 feet of off-site vibration sensitive receptors.</li> <li>– Limit the location of small bulldozer to 25 feet of off-site vibration sensitive receptors.</li> </ul> </li> </ul>				
<p><b>PDF NOISE-3      Operational (CCP)</b></p> <p>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.).29F</p> <p>The design of any barriers along the guideway designed to reduce noise shall be subject to the limits noted in <b>Table 4.10-9</b>.</p>	Operator	JPA/DPW-Engineering Division		

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<b>4.12 Transportation</b>				
<p><b>PDF TRANS-1 Transit Access and Circulation Program (CCP)</b></p> <p>The Project Task Force (as identified in the Construction Commitment Program) will be responsible for the following:</p> <ul style="list-style-type: none"> <li>• Ensuring that access to bus transit stops and bus circulation are always maintained, unless infeasible and closure is approved by the City.</li> <li>• Coordinating with Metro and any other transit service providers to: <ul style="list-style-type: none"> <li>– 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.</li> <li>– Reroute transit bus lines if necessary, during construction with appropriate wayfinding signage and information dissemination.</li> </ul> </li> </ul>	Project Task Force	JPA/DPW-Transportation & Traffic Division, Project Task Force		. The Plan shall be implemented prior to start of construction activities for each site or phase of the Project, as applicable. Access to bus transit stops and maintenance of bus circulation would be ongoing during construction.
<p><b>PDF TRANS-2 Construction Staging &amp; Traffic Control Program (CCP)</b></p> <p>A Construction Staging and Traffic Control Program will be developed by members of the Project Task Force (as defined in the Construction Commitment Program), subject to review and acceptance by the City and/or the JPA, and will address the following topics:</p> <ul style="list-style-type: none"> <li>• Coordination with other public infrastructure projects within the City’s boundaries</li> <li>• Detour routes, including analysis of impacts to pedestrian, business, bicycle, transit, and traffic flow</li> <li>• Coordination of closures and restricted access during the construction period with special attention during periods of</li> </ul>	Project Task Force	JPA/DPW-Transportation & Traffic Division		The Program shall be implemented prior to start of construction activities for each site or phase of the Project, as applicable. Notification of street closures would be posted online 45 to 60 days prior to closures.

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>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.</p> <ul style="list-style-type: none"> <li>• Coordination with the City, police, and fire services department regarding maintenance of emergency access and response times</li> <li>• Monitoring and coordination of construction materials deliveries</li> <li>• 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.</li> </ul> <p>The Traffic Control Program will be developed as needed based on the following principles:</p> <ul style="list-style-type: none"> <li>• Minimize traffic impacts on residential streets.</li> <li>• 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.</li> <li>• 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.</li> <li>• Maintain access for all public safety vehicles (such as police,</li> </ul>				

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>fire, and emergency response).</p> <ul style="list-style-type: none"> <li>• Maintain bicycle and pedestrian access within the Project area or approved detours at all times.</li> <li>• Provide adequate street access to City service vehicles, including but not limited to trash pickup and street sweeping service vehicles, during planned service times.</li> <li>• Sidewalk closures should 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.</li> <li>• Use traffic control officers/flaggers as appropriate to minimize the degree and duration of impacts and maintain safety.</li> <li>• Establish and maintain wayfinding signage.</li> <li>• Maintain vehicular and pedestrian access to all businesses and residents impacted by construction activities including roadway closures.</li> <li>• 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.</li> <li>• 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.</li> <li>• Entry and exit to the Market Street/Florence Avenue construction site shall be limited to right turns to/from Florence Avenue for large trucks, construction equipment, and material deliveries. An entrance off Locust Street between Florence Avenue and Regent Street will also be required to serve the contractor’s offices and staging area. If required for phasing, the Locust Street entrance may also be</li> </ul>				

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>used for large trucks, construction equipment, and material deliveries as approved by the City.</p>				
<p><b>PDF TRANS-3 Preliminary Haul and Overload Routes (CCP)</b></p> <ul style="list-style-type: none"> <li>Haul routes and overload/oversized vehicle routes are subject to review and approval by the City.</li> <li>To the extent possible, truck deliveries and hauling of bulk materials such as aggregate, bulk cement, dirt, etc. to the Project area, and hauling of material from the Project area, shall be scheduled during off-peak hours to avoid the peak commuter traffic periods on designated haul routes.</li> <li>Truck deliveries and hauling of dirt, aggregate, bulk cement, and all other materials and equipment, shall be on designated routes only (freeways and nonresidential streets).</li> </ul>	<p>Contractor/ Operator</p>	<p>JPA/DPW- Transportation &amp; Traffic Division</p>	<p>Haul routes shall be designated prior to start of construction activities for each site or phase of the Project, as applicable.</p>	
<p><b>PDF TRANS-4 Pedestrian Access Program (CCP)</b></p> <p>A Pedestrian Access Program will be developed by members of the Project Task Force (as defined in the Construction Commitment Program), subject to review and acceptance by the City and/or the JPA, and will adhere to the following principles:</p> <ul style="list-style-type: none"> <li>Pedestrian access to buildings shall be maintained at all times.</li> <li>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.</li> <li>Establish and maintain pedestrian wayfinding signage.</li> <li>Maintain sidewalk access for pedestrians, including providing</li> </ul>	<p>Project Task Force</p>	<p>JPA/DPW- Transportation &amp; Traffic Division</p>	<p>The Program shall be implemented prior to start of construction activities for each site or phase of the Project, as applicable.</p>	

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>temporary sidewalks if existing sidewalks are disrupted during construction. Any sidewalk closures are subject to review and approval by the City.</p> <ul style="list-style-type: none"> <li>• Sidewalks that are being maintained in a temporary condition shall meet all applicable safety standards, including but not limited to the requirements of the Federal Americans with Disabilities Act and similar California laws.</li> <li>• Protect pedestrians from construction-related debris, dust, and noise; such protection may include the use of dedicated pedestrian barriers.</li> <li>• Coordinate with the Inglewood Unified School District 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.</li> </ul>				
<p><b>PDF TRANS-5 Parking Management Plan (CCP)</b></p> <p>A Parking Management Plan (as defined in the Construction Commitment Program) will 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:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Replace loss of metered parking spaces by making available</li> </ul>	<p>Project Task Force</p>	<p>JPA/DPW-Transportation &amp; Traffic Division</p>	<p>The Plan shall be implemented prior to start of construction activities for each site or phase of the Project, as applicable.</p>	

Project Design Features	Implementing Party	Monitoring Party	Timing	Notes
<p>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.</p> <ul style="list-style-type: none"> <li>• Provide public notice of the availability of the alternative parking spaces through outreach to businesses and residents with signage.</li> </ul>				



**APPENDIX D**

**ITC Construction Commitment Program**

# Construction Commitment Program

February 2022

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## INGLEWOOD TRANSIT CONNECTOR PROJECT CONSTRUCTION COMMITMENT PROGRAM

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### 1.0 INTRODUCTION

The Inglewood Transit Connector (ITC) Project includes this Construction Commitment Program to proactively address the potential effects of the construction of the Project on the community. This Program addresses:

- Business and community support plans
- Construction staging and traffic control requirements
- Maintaining access to parking, businesses, residences, and pedestrian facilities
- Noise and vibration measures
- Air quality measures
- Other vital measures during construction
- Tree removal and replacement

A Project Task Force will be established for the ITC Project. The Project Task Force will include representation from the following entities:

- City of Inglewood (City)
- The ITC Joint Powers Authority (JPA) – that will be responsible for the oversight of the DBFOM Contractor during the design, construction and subsequent operations and maintenance of the ITC Project.

The DBFOM Contractor (responsible for the design, build/construct, finance, operations, and maintenance of the ITC Project)

### 2.0 BUSINESS AND COMMUNITY SUPPORT PROGRAM

The Project Task Force will be responsible for developing a Business and Community Support Program for the purpose of assisting those businesses financially affected by the construction that addresses the following:

- 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 effects.
- 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 BUSINESS ASSISTANCE FUND PROGRAM**

The City is committed to providing financial assistance to small “mom and pop” businesses to help offset to the extent possible, business revenue losses or increased expenses that are directly attributable to disruptions during the ITC construction activities within the ITC Project area. The City will create a \$5 million dollar Business Assistance Fund (BAF) to provide financial assistance through grants to eligible businesses for eligible expenses as established by the BAF Program Administrator. Similar to the LA Metro BIF model, businesses may file multiple requests for financial assistance through the BIF; but in no event will the amount paid exceed the lesser total amount of \$50,000, or 60% of annual business revenue losses per business. The financial assistance is expected to cover eligible fixed operating expenses such as utilities, insurance, rent or mortgage (excluding the principal amount portion of the mortgage payment), fixed payroll, and certain other documented business-related expenses as determined by the BAF Program Administrator. The City will develop Administrative Guidelines to establish program eligibility requirements targeted to businesses that are directly impacted by the ITC Project construction, are located within the eligible geographic area in proximity to the ITC Project, and that meet the definition of small “mom and pop” businesses. Anticipated requirements to participate in the program, include:

- Businesses must be in continuous operation for at least two years within the eligible geographic area.
- Businesses must provide financial records (e.g., gross receipts, payroll taxes, bank statements or other financial information as requested) to demonstrate the business revenue losses or increased expenses are directly attributable to the ITC construction activities during the period of disruption.
- Businesses must be financially solvent and have a good faith plan and commitment to remain in business within the eligible geographical area; and
- Businesses must be in good standing with all local, state and federal taxing and licensing authorities.

### **4.0 COMMUNITY AFFAIRS LIAISON**

The Community Affairs Liaison shall be responsible for responding within 24 hours to any local complaint or question about construction activities. A website will be established with project construction information and contact information for the Community Affairs Liaison. A toll-free phone line (available 24 hours a day) and website will be made a part of all construction notices and shall be posted in prominent public facing locations around the Project area and in adjacent public spaces.

The Community Affairs Liaison shall receive all public complaints, investigate the cause of the complaint and develop/implement feasible measures to address and resolve the cause of the complaint.

## 5.0 TRANSIT ACCESS AND CIRCULATION PROGRAM

The Project Task Force will be responsible for the following:

- Ensuring that access to bus transit stops and bus circulation are always maintained, unless infeasible and closure is approved by the City.
- Coordinating 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.

## 6.0 CONSTRUCTION STAGING & TRAFFIC CONTROL PROGRAM

The Construction Staging and Traffic Control Program will be developed by members of the Project Task Force, subject to review and acceptance by the City and/or the JPA, and will 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, transit 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 will be developed based on the following principles:

- 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 should 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.
- Entry and exit to the Market Street/Florence Avenue construction site shall be limited to right turns to/from Florence Avenue for large trucks, construction equipment, and material deliveries. An entrance off Locust Street between Florence Avenue and Regent Street will also be required to serve the contractor's offices and staging area. If required for phasing, the Locust Street entrance may also be used for large trucks, construction equipment, and material deliveries as approved by the City.

### **6.1 Preliminary Haul And Overload Routes**

- Haul routes and overload/oversized vehicle routes are subject to review and approval by the City.
- To the extent possible, truck deliveries and hauling of bulk materials such as aggregate, bulk cement, dirt, etc. to the Project area, and hauling of material from the Project area, shall be scheduled during off-peak hours to avoid the peak commuter traffic periods on designated haul routes.
- Truck deliveries and hauling of dirt, aggregate, bulk cement, and all other materials and equipment, shall be on designated routes only (freeways and nonresidential streets)

### **6.2 Pedestrian Access Program**

A Pedestrian Access Program will be developed by members of the Project Task Force, subject to review and acceptance by the City and/or the JPA, and will 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 pedestrian 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 Federal Americans with Disabilities Act and similar California laws.
- Protect pedestrians from construction-related debris, dust and noise; such protection may include the use of dedicated pedestrian barriers.
- Coordinate with the Inglewood Unified School District (IUSD) and the City to provide crossing guards at locations requested by IUSD or the City when crosswalks or sidewalks are closed. Identify temporary alternative routes to schools, working closely with IUSD and the City and disseminate this information to schools and stakeholders affected by construction.

## **7.0 PARKING MANAGEMENT PLAN**

A Parking Management Plan will 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:

- 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.

## **8.0 AIR QUALITY PROGRAM**

- 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, that 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.
  - The 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.
- Dust shall be controlled per local ordinances. The Contractor shall be responsible for excessive dust or construction debris that results in impacts to adjacent residences or private vehicles, including taking responsibility for clean-up and addressing complaints brought to the project.
- All trucks carrying fill materials, debris, or similar materials shall secure and cover loads to prevent dust or debris while travelling on public right of ways.
- All trucks removing materials from the site will be loaded within the site perimeter and will be required to cover loads as deemed necessary for dust control.

- Material stockpiles and construction area surfaces shall be covered and/or watered as needed to prevent dust at designated construction areas.
- 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.
- Contractors shall maintain and operate construction equipment to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications and documentation demonstrating proper maintenance, in accordance with the manufacturer's specifications, shall be maintained on site. Tampering with construction equipment to increase horsepower or to defeat emission control devices must be prohibited.
- Require in all applicable bid documents, purchase orders, and contracts of the requirement to notify all construction vendors, contractors, and/or haul truck operators that vehicle and construction equipment idling time will be limited to no longer than five minutes, consistent with the CARB's policy. For any idling that is expected to take longer than five minutes, the engine should be shut off. Notify construction vendors, contractors, and/or haul truck operators of these idling requirements at the time that the purchase order is issued and again when vehicles enter the Project area. To further ensure that drivers understand the vehicle idling requirement, post signs at the proposed Project entry gates and throughout the Project alignment, where appropriate, stating that idling longer than five minutes is not permitted.

## **9.0 VISUAL RESOURCES PROGRAM**

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 will be limited to the amount necessary to safely perform the required work and will 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.
- Construction night lighting shall be shielded to prevent a direct view of the light sources from residential properties with a property boundary that is within 150 feet of the construction site.
- 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.
- When not in use or being staged, heavy equipment shall be located as far as practicable from residential areas, businesses and pedestrian pathways.

## 10.0 HAZARDOUS MATERIALS PROGRAM

The following practices will be followed during construction to address the potential for encountering hazardous materials during construction of the Project.

- **Building Demolition Plan** – Prior to any demolition occurring, conduct an evaluation of all buildings built prior to 1980 to be demolished to identify the presence of asbestos containing materials (ACMs) and lead-based paint (LBP). Remediation shall be implemented in accordance with the recommendations of these evaluations to ensure that no ACMs or LBP remain present and to ensure ACMs and LBP are removed to levels established for public safety.
- **Hazardous Materials Contingency Plan** – Prior to construction, prepare a plan addressing the potential for discovery of unidentified underground storage tanks (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 materials encountered during construction are removed to levels established for public safety.
- **Soil Management Plan** – After final construction plans are prepared showing the lateral and vertical extent of soil excavation during construction are prepared, prepare a Soil Management Plan to 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.
- **Health and Safety Plan** – Prior to construction, prepare a Health and Safety Plan to address the potential for exposure to the constituents of concern identified in the limited Phase II ESA.
- **Utility Relocation Work** – All Project utility relocations in the vicinity of Kelso Elementary School shall be designed and constructed to remain within the public right-of-way and not impact school property. Relocations shall be located further away from the school as feasible and designed and constructed to current standards to assure that they create no unacceptable hazards to the school. During Project construction, any open trenches and construction equipment shall be marked and barricaded such that they are not accessible by the students or create any potential hazard to school operations. Project utility relocations or cut overs that may require disruption to normal school utility services shall be scheduled to occur outside of normal school hours with advanced notification to the School District.

## 11.0 NOISE AND VIBRATION CONTROL PROGRAM

### 11.1 Construction Noise Control Plan

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 the Federal Transit Administration's (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.
- Staging of construction material deliveries behind fencing to minimize noise emitting from idling vehicles.
- On site-signage reminding workers to minimize noise generation.
- When not in use or being staged, heavy equipment shall be located as far as practicable from sensitive receptors.
- For project foundations, consider the use of drilled piles or sonic pile drivers or vibratory pile drivers instead of traditional impact pile drivers, as permitted by geological conditions.
- Sequence noisy activities to occur during the same general time period during daytime hours to the extent practical.

- Select quieter demolition methods where appropriate and feasible such that demolition activities can remain within the project specified noise levels.
- Unless deemed infeasible for a particular construction activity, the Contractor shall utilize rubber tire earth moving equipment in lieu of track mounted earth moving equipment.
- Construction material deliveries shall take place within designated construction staging areas as far from residential sites as practical to minimize noise impacts.
- Provide signage at active construction sites and staging areas reminding workers, equipment operators and delivery vehicles to minimize noise levels to the extent possible.
- Rumble strips or signage shall be provided at roadway access points into contractor laydown and staging areas to slow construction vehicles and limit vehicle noise.
- Coordinate with Inglewood Unified School District administrators to avoid disruptive noise during school hours including scheduling heavy equipment such as cranes, haul trucks, concrete trucks, concrete pumps, pneumatic equipment, earth moving vehicles or similar to operate outside of school hours. The City shall require that the Project's construction noise during school hours would be limited to 5 dBA Leq 1-hour above the measured ambient noise levels at Kelso School property line as identified in the RDEIR. Activities that would exceed this threshold shall be scheduled to occur outside of normal school hours or mitigated with specific mitigation measures such as temporary sound walls, sound blankets, or other sound-attenuating devices. The City shall monitor the Project's construction noise levels during school hours to assure compliance. As requested by the District, monthly noise monitoring reports on noise levels during school hours at Kelso School will be provided to the District.

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

In order to ensure that acceptable noise levels are maintained at Kelso School, real time noise monitoring will be conducted at Kelso School during the school day. A noise monitor will be located at the southeast corner of Kelso School on Prairie Avenue. This noise monitor will update the 1-hour Leq noise level every minute during the school day. Any time the 1-hour Leq noise level increases by 3 dBA over the ambient noise level during the school day, an alert message will be sent to the construction manager(s) and contact(s) for the contractor(s) working in the vicinity of the school to allow for adjustments to be made to the work in progress to avoid noise levels reaching or exceeding an increase of 5 dBA 1-hour Leq over ambient noise levels. A contact will also be provided to the Inglewood Unified School District and administration at Kelso School to resolve any District or Kelso School concerns with construction activities and their resulting noise levels during the school day.

## 11.2 Construction Vibration Reduction Plan

Prior to the issuance of any demolition or construction permit for each phase of the 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 to ensure impacts from ground borne vibration are less than significant:

- 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 project activities.
  - Crack gauges shall be installed on multiple representative cracks, particularly on sides of the building facing the 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 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 Joint Powers Authority and/or the City 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 Joint Powers Authority and/or City 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 post-construction 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 Project and/or show how the 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 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 (1) 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.

## **12.0 TREE REMOVAL AND REPLACEMENT PLAN**

A Tree Removal and Replacement Plan will 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 will 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 12 (12) 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 will 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.

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# Notice of Determination

Notice of Determination

Appendix D

To:

Office of Planning and Research
U.S. Mail: Street Address:
P.O. Box 3044 1400 Tenth St., Rm 113
Sacramento, CA 95812-3044 Sacramento, CA 95814

County Clerk
County of: Los Angeles
Address: 12400 Imperial Hwy
Norwalk, CA, 90650

From:

Public Agency: City of Inglewood
Address: One West Manchester Boulevard
Inglewood, CA 90301
Contact: Mindy Wilcox
Phone: (310) 412-5230

Lead Agency (if different from above):
Address:
Contact:
Phone:

SUBJECT: Filing of Notice of Determination in compliance with Section 21108 or 21152 of the Public Resources Code.

State Clearinghouse Number (if submitted to State Clearinghouse): 2018071034

Project Title: Inglewood Transit Connector Project

Project Applicant: City of Inglewood

Project Location (include county): City of Inglewood, County of Los Angeles, California

Project Description:

The Inglewood Transit Connector Project (ITC Project) is a 1.6-mile, three-station, fully elevated, electrically powered light-rail transit system, including, among other things, an Automated Transit System (ATS) mass-transit line, proposed by the City to close the last-mile gap and connect passengers between the Metro K Line Downtown Inglewood to major event and activity centers, including the Forum, the Los Angeles Sports and Entertainment District (which includes SoFi Stadium) and the Inglewood

This is to advise that the City of Inglewood has approved the above (Lead Agency or Responsible Agency)

described project on 04/12/22 and has made the following determinations regarding the above described project.

- 1. The project will not have a significant effect on the environment.
2. An Environmental Impact Report was prepared for this project pursuant to the provisions of CEQA.
3. Mitigation measures were made a condition of the approval of the project.
4. A mitigation reporting or monitoring plan was adopted for this project.
5. A statement of Overriding Considerations was adopted for this project.
6. Findings were made pursuant to the provisions of CEQA.

This is to certify that the final EIR with comments and responses and record of project approval, or the negative Declaration, is available to the General Public at:

City's website at https://www.cityofinglewood.org/1016/Environmental-Documents

Signature (Public Agency): Mindy Wilcox Title: Planning Manager

Date: 4-13-22 Date Received for filing at OPR:

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## Findings of Fact

# **CEQA FINDINGS OF FACT FOR THE INGLEWOOD TRANSIT CONNECTOR**

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In determining to approve the Inglewood Transit Connector project (“Project”), the City of Inglewood (“City”) City Council makes and adopts the following findings of fact and decisions regarding mitigation measures and alternatives based on substantial evidence in the whole record of this proceeding and under the California Environmental Quality Act (“CEQA”) (Pub. Resources Code, § 21000 et seq.), particularly Public Resources Code sections 21081 and 21081.5, the State Guidelines for Implementation of CEQA (“CEQA Guidelines”) (California Code of Regulations, tit. 14, § 15000 et seq.), particularly sections 15091 through 15093, and City of Inglewood Municipal Code, Chapter 12, Article 28.

This document is organized as follows:

**Section I** provides a description of the Project, the environmental review process for the Project, the approval actions to be taken, and the location of records;

**Section II** identifies the impacts found not to be significant that do not require mitigation;

**Section III** identifies potentially significant impacts that can be avoided or reduced to less-than- significant levels through mitigation and describes the disposition of the mitigation measures;

**Section IV** evaluates the different Project alternatives and the economic, legal, social, technological, and other considerations that support approval of the Project and the rejection of the alternatives, or elements thereof, analyzed.

The Mitigation Monitoring and Reporting Program (“MMRP”) for the mitigation measures that have been proposed for adoption are adopted with these findings. The MMRP is required by CEQA section 21081.6, subdivision (a)(1), and CEQA Guidelines sections 15091, subdivision (d), and 15097. The MMRP provides a table setting forth each mitigation measure listed in the Final Environmental Impact Report for the Project (“Final EIR”) that is required to reduce or avoid a significant adverse impact. The MMRP also includes the Project Design Features incorporated into the Project and identified in the EIR to avoid or lessen impacts of the Project. Exhibit C also specifies the agency responsible for implementation of each measure. All of the City’s specific obligations are also described. The full text of each mitigation measure summarized or cited in these findings is set forth in the MMRP.

Under CEQA, the City Council has discretion to revise or reject proposed mitigation measures. These findings reflect the mitigation measures as set forth in the EIR. If and to the extent the City Council directs

City staff to revise the mitigation measures listed in these findings or in the MMRP, City staff will revise these documents as necessary to reflect the City Council's direction.

These findings are based upon substantial evidence in the entire record before the City Council. In these findings the references to certain pages or sections of the Recirculated Draft or Final EIR, which together constitute the EIR, are for ease of reference and are not intended to provide an exhaustive list of the evidence relied upon for these findings. A full explanation of the substantial evidence supporting these findings can be found in the EIR, and these findings hereby incorporate by reference the discussion and analyses in those documents supporting the EIR's determinations regarding the Project's impacts and mitigation measures designed to address those impacts. References to the Recirculated Draft EIR or to the EIR are intended as a general reference to information that may be found in either or both the Recirculated Draft EIR or Final EIR.

## **I. APPROVAL OF PROJECT**

### **A. Description of the Project**

The Project is an Automated Transit System (ATS), which would include an approximately 1.6-mile-long, elevated, guideway located within current and to-be-acquired public right-of-way along Market Street, Manchester Boulevard, and Prairie Avenue. Three stations are proposed adjacent to the guideway on privately owned land that is proposed to be acquired as part of the Project. The elevated guideway will contain dual lanes to allow trains to travel continuously in each direction. Several trains would likely be operating at the same time, depending on ridership demand.

As part of the City's collaboration and partnership with the Los Angeles County Metropolitan Transportation Authority (Metro), the Project is an extension of the Metro regional rail system to the City's activity centers, closing the critical first/last mile transit gap in Inglewood, increasing passenger service along the Metro system by facilitating a seamless transfer of passengers between the ITC and the Metro K Line.

The ATS technology may be a self-propelled technology, including rubber-tire ATS systems, monorails, large steel-wheel ATS systems, also known as automated light rail transit (ALRT), or a cable-propelled ATS system. The system will be fully automated (i.e., driverless) to operate at the headways to meet the projected peak ridership needs.

The ATS trains will operate in a pinched-loop mode on dual tracks along the alignment, wherein trains follow each other and switch back at the end-of-line stations to make the return journey on the other track. As planned, the trains can be operated in multiple different configurations, ranging from a one-car

train to multiple-car length trains with a maximum train length of approximately 200 feet. Depending on the technology (self-propelled or cable propelled), ridership demands, which will be time of day and event day dependent, multiple trains of up to the maximum train length can be operated at varying headways for self-propelled systems, as close as 1.5 minutes apart, to provide the necessary peak and reserve capacity.

The Project includes three stations::

- a) The *Market Street/Florence Avenue* station generally located between Market Street and Locust Street providing connections to the Metro K Line and Downtown Inglewood;
- b) The *Prairie Avenue/Manchester Boulevard* station located on the southwest corner of the intersection of Prairie Avenue and Manchester Boulevard providing service to the Forum, Hollywood Park including SoFi Stadium, and existing and future local businesses and residences.
- c) The *Prairie Avenue/Hardy Street* station located on the northwest corner of the intersection of Prairie Avenue and Hardy Street providing service to the Hollywood Park, including SoFi Stadium, the Inglewood Basketball and Entertainment Center including Intuit Dome, and other existing and future local businesses and residences.

These station locations were chosen to be near major employment, housing, and retail centers, including the Forum, SoFi Stadium, and other employment, housing, and retail commercial uses in the Hollywood Park Specific Plan (HPSP), the IBEC, and Downtown Inglewood, which the City is seeking to enhance and activate.

Existing roadways and infrastructure along the transit alignment will require reconfiguration to accommodate the new elevated transit guideway structures and stations. In addition to surface improvements, utility infrastructure located under roadways may need to be relocated to accommodate the guideway columns, footings, and other components. The roadway reconfigurations proposed along Market Street, Manchester Boulevard, and Prairie Avenue are necessary to assure that the existing roadway travel capacity is not reduced to accommodate the Project.

The Project includes a Maintenance and Storage Facility (MSF) to provide regular and preventive maintenance for the ATS trains, vehicle storage, and an operations control center located on the eastern half of the block bound by Manchester Boulevard, Hillcrest Boulevard, Nutwood Street and Spruce Avenue. An existing commercial building containing a Vons grocery store, a fitness center, and a bank branch, is located on the southern portion of this site. A gas station operated by Vons is located on the northeast portion of this site. Demolition of the existing commercial building and gas station is proposed

as part of the Project. A new Vons replacement store is proposed on the corner of Manchester Boulevard and Hillcrest Boulevard.

The MSF will be designed in accordance with the ITC Design Standards and Guidelines (Design Guidelines), which address the massing, façade, materials, colors, roof, and lighting for this facility, how the MSF will engage with the passenger and vehicular circulation around it, and sustainability features. The Project also includes two power distribution system (PDS) substations. These PDS substations will provide the necessary power for the Project, including traction power, auxiliary power, and housekeeping power for the stations and related infrastructure. One of the PDS substations will be located on the MSF site, where the Southern California Edison (SCE) service connection will be provided. The second PDS substation will be located on the Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard station site.

Additional public parking will be provided as part of the Project at three locations that will be used as construction staging areas. After construction, these sites will be improved as public parking lots:

- Approximately 650 parking spaces will be provided in a surface parking lot at the Market Street/Florence Avenue Station along with pick-up and drop-off areas on Locust Avenue and Regent Street.
- Approximately 50 parking spaces would be provided in a surface parking lot at 150 S. Market Street.
- Approximately 80 parking spaces and a shuttle bus pick-up and drop-off area are would be provided at the Prairie Avenue/Hardy Street Station. This lot would be used for public parking, TNCs and shuttle bus pick-up and drop-off operations during events.

These parking areas will provide public parking needed in the City to support use of the Project, businesses, and the City's efforts to help revitalize the historic retail areas along Market Street. The Project is designed and intended to extend the transit service provided by the Metro K Line to the major event venues and existing and planned residential and commercial uses in the City, and these parking facilities are proposed to support transit use. On non-event days, the parking is designed to allow the City's residents to become transit riders and use the Metro Rail system, providing local convenient parking adjacent to the ITC and Metro K Line. On event days, the City recognizes that many visitors may still drive to the City in search of convenient parking with proximity to commercial uses and access to a direct transportation connection to the City's major event venues. To help with overall traffic congestion and improve circulation on local streets, and to help reduce visitors parking in residential areas, the Project includes parking in close proximity to the Project stations and downtown Market Street area. These parking areas will also provide replacement parking for public parking on streets that may be removed as part of the Project.

## B. Project Objectives

Section 15124, subdivision (b) of the CEQA Guidelines states that the Project Description shall contain “[a] statement of the objectives sought by the Project.” In addition, Section 15124, subdivision (b) of the CEQA Guidelines further states, “[t]he statement of objectives should include the underlying purpose of the project.”

The City’s goals and objectives for the Project are as follows:

- Provide a direct and convenient extension of the Metro regional transit system for local residents and the region to access the City’s new major housing, employment, commercial, and activity centers;
- Close the “last mile gap” to the regional transit system by providing passengers with the ability to transfer to or from destinations and the Metro K Line.
- Provide sufficient transit connection capacity between the Metro regional transit system and the City’s major activity centers with enhanced travel time certainty and sufficient capacity to meet peak ridership demands to encourage transit as a travel mode choice;
- Maintain existing roadway capacity to the extent feasible;
- Reduce the City’s traffic congestion and alleviate growing demand on the existing roadway network on both major arterials and residential streets for both nonevent and event days;
- Encourage intermodal transportation systems by providing convenient, reliable time-certain transit;
- Increase transit mode split, reduce vehicle trips, and reduce per-capita vehicle miles traveled to the City’s major activity centers, with corresponding improvements in air quality, public health, and reductions in greenhouse gas emissions from transportation sources in accordance with the City’s goals, the SCAG 2020-2045 RTP/SCS, and State policies with respect to climate change and land use.
- Support the ongoing economic revitalization and growth opportunities for transit-oriented development (TOD) within the Downtown TOD Plan area, including commercial and residential uses, including through the creation of public parking facilities;
- Encourage redevelopment and investment within the City in areas served by the Project;
- Provide safe, reliable, and convenient access to businesses in the City so that they are accessible to their workforce and customers;
- Connect the Inglewood community and citizens to jobs, education, services, and destinations within the City and in the region by providing transit within safe and accessible walking distances; and
- Support regional efforts to become more efficient, economically strong, equitable, and sustainable.

## C. Environmental Review

### 1. Preparation of the Final EIR

The EIR for the Inglewood Transit Connector (SCH No. 2018071034) was prepared, noticed, published, circulated, reviewed, and completed in full compliance with CEQA, the CEQA Guidelines (, and the City of Inglewood Municipal Code, as follows:

- a) In 2017, the City partnered with Metro to address the City’s critical mobility issues by analyzing viable transit connection options from the Metro K Line to the LASED, which includes SoFi Stadium. With the City’s input, Metro conducted a study<sup>1</sup> to explore how best to extend the Metro Rail system via a high-capacity transit connection to the LASED.
- b) In early 2018, the City also initiated stakeholder outreach to understand the City’s need for a comprehensive long-range mobility plan, potential project goals and objectives, potential project benefits and impacts, and stakeholder concerns.
- c) In July 2018, pursuant to the requirements of CEQA, the City as the Lead Agency prepared a Notice of Preparation (Original NOP) and an Initial Study (Original IS) (SCH 2018071034).
- d) The Original NOP and IS were circulated and comments were received from the public and agencies following a 30-day comment period that ended on August 15, 2018.
- e) A scoping meeting was held on July 26, 2018, from 6 PM to 8 PM at the Inglewood Senior Citizens Center, 111 N. Locust Street, Inglewood, CA 90301. The City provided the opportunity for comments to be submitted at the scoping meeting.
- f) As a result of the comments received and refinements and modifications to the Project identified in the Original NOP and Original IS after circulation of the July 2018 Notice of Preparation, a Revised NOP and IS were circulated for public review and comment from September 10, 2020 to October 12, 2020. The City submitted both the Original and Revised NOPs and Initial Studies to the Governor’s Office of Planning and Research (OPR); applicable trustee or responsible federal, State, regional, and local agencies identified for the Project, including adjacent cities and counties; the County of Los Angeles; relevant Native American tribes; and all interested parties requesting such notice to allow for comment on the IS during the 30-day comment period. In addition, copies of the Original and Revised NOPs and ISs were made available for review at Inglewood City Hall and the Inglewood Public library, as well as on the City’s website, to give the public the opportunity to comment during the respective 30-day comment periods.
- g) The City prepared and released a Draft EIR for public review in December 2020. Based on additional feedback received during the Draft EIR circulation period the City continued further collaboration with key stakeholders on the design of the Project. City also conducted additional technical analysis and

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1 Los Angeles County Metropolitan Transportation Authority, *City of Champions/Inglewood (NFL) Focused Analysis of Transit Connection* (August 2017).

due diligence on potential utility conflicts, property impacts, and potential impacts to historical resources, and refined the project to reduce the project footprint where feasible.

- h) As a result of this ongoing consultation process, the City further refined the Project and revised the Draft EIR to evaluate these changes to the Project. The City prepared and released a Recirculated Draft EIR for public review in November 2021. The Revised Project as evaluated in the RDEIR remains an approximately 1.6-mile long alignment with 3 stations beginning at the intersection of Market Street and Florence Avenue, continuing along Manchester Avenue and Prairie Avenue, and ending at the intersection of Prairie Avenue and Hardy Street.
- i) A Notice of Completion (NOC) and copies of the Draft EIR were filed with SCH on November 12, 2021. An official 45-day public review period for the Draft EIR was established by SCH, ending on December 27, 2021. A Notice of Availability (NOA) for the Draft EIR was published on November 11, 2021 and sent to appropriate public agencies, including SCH and Los Angeles County Clerk, and all entities who requested to be notified about the Project and/or EIR. The Recirculated Draft EIR was also published on the City's website.
- j) On January 25, 2022, the City held a hearing at which it determined that the Project is exempt from CEQA pursuant to CEQA section 21080, subdivision (b)(12) and CEQA Guidelines section 15275, subdivision (b) as a "[f]acility [extension] not to exceed four miles in length which [is] required for the transfer of passengers from or to exclusive public mass transit guideway or busway public transit services."
- k) On **February XX**, 2022, the City released the Final EIR for the Project. The Final EIR included (i) comments on the Recirculated Draft EIR submitted during the comment period, (ii) responses to those comments, (iii) staff-initiated revisions to the text of the Recirculated Draft EIR, together with an explanation of why those changes were made, and (iv) a draft of the MMRP. The City sent notice to those submitting comments and to other interested agencies and individuals that the Final EIR had been released, stating that the Final EIR had been posted and was available for review on the City's web site, and that the Final EIR included responses to comments received on the Recirculated Draft EIR.
- l) On March 3, 2022, following a public hearing, the City Planning Commission adopted a resolution recommending that the City Council certify the Final EIR, adopt these findings, and approve the MMRP.
- m) The City made documents available to the public in a readily accessible electronic format, including the Recirculated Draft EIR, all documents submitted to or relied on in the preparation of the Recirculated Draft EIR, comments and the Final EIR, as required by Public Resources Code section 21168.6.8(g). Documents were posted in a timely manner on the City's Economic and Community Development Department EIR web page at <https://www.cityofinglewood.org/1016/Environmental-Documents> and [www.inglewoodtransitconnector.com](http://www.inglewoodtransitconnector.com).

## 2. Recirculation

Under section 15088.5 of the CEQA Guidelines, recirculation of an EIR is required when “significant new information” is added to the EIR after public notice is given of the availability of the Draft EIR for public review but prior to certification of the Final EIR. The term “information” can include changes in the project or environmental setting, as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:

- 1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- 2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- 3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.
- 4) The DEIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

(CEQA Guidelines, § 15088.5, subd. (a).)

Recirculation is not required where the new information added in the Final EIR merely clarifies or amplifies or makes insignificant modifications in an adequate Draft EIR. The above standard is “not intend[ed] to promote endless rounds of revision and recirculation of EIR’s.” (*Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1132 (*Laurel Heights*).) “Recirculation was intended to be an exception, rather than the general rule.” (*Ibid.*)

The City recognizes that minor changes have been made to the Project and additional evidence has been developed after publication of the Recirculated Draft EIR. The refinements to the project are described in Chapter 2 of the Final EIR. As described in the Final EIR, these refinements would result either in no changes to the impact conclusions or in a reduction in the severity of the impact presented in the Recirculated Draft EIR. In addition, minor refinements that have occurred after the publication of the Final EIR will not result in new or substantially more severe significant impacts.

Finally, the Final EIR includes supplemental data and information that was developed after publication of the Recirculated Draft EIR to further support the information presented in the Recirculated Draft EIR. None of this supplemental information affects the conclusions or results in substantive changes to the information presented in the Recirculated Draft EIR or to the significance of impacts as disclosed in the Recirculated Draft EIR.

CEQA case law emphasizes that “[t]he CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal.” (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 736–737 (*Kings County*); see also *River Valley Preservation Project v. Metropolitan Transit Development Bd.* (1995) 37 Cal.App.4th 154, 168, fn. 11.) “CEQA compels an interactive process of assessment of environmental impacts and responsive project modification which must be genuine. It must be open to the public, premised upon a full and meaningful disclosure of the scope, purposes, and effect of a consistently described project, with flexibility to respond to unforeseen insights that emerge from the process.’ [Citation.] In short, a project must be open for public discussion and subject to agency modification during the CEQA process.” (*Concerned Citizens of Costa Mesa, Inc. v. 33rd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 936.)

Similarly, additional studies included in a Final EIR that result in minor modifications or additions to analysis concerning significant impacts disclosed in a Draft EIR does not constitute “significant new information” requiring recirculation of an EIR. (See *Mount Shasta Bioregional Ecology Center v. County of Siskiyou* (2012) 210 Cal.App.4th 184, 221 [incorporation of technical studies in a Final EIR disclosing additional locations affected by a significant noise impact identified in the Draft EIR did not require recirculation].) Here, the changes made to the Project and the additional evidence relied on in the Final EIR are the kind of information and revisions that the case law recognizes as legitimate and proper and does not trigger the need to recirculate the Recirculated Draft EIR.

The City Council finds that none of the changes and revisions in the Final EIR substantially affect the analyses or conclusions presented in the Recirculated Draft EIR, and do not constitute significant new information; therefore, recirculation of the Recirculated Draft EIR for additional public comments is not required.

## **D. Approval Actions**

Implementation of the Project may require, but may not be limited to, the following actions by the City of Inglewood:

- Certification of the Final EIR for the Inglewood Transit Connector Project and adoption of the Mitigation Monitoring and Reporting Plan, CEQA Findings of Fact, and, if necessary, a Statement of Overriding Considerations;
- Approval of the proposed General Plan Amendment, consisting of changes to the City General Plan Land Use Element, Circulation Element, and Safety Element;
- Approval of an amendment to Chapter 12 (Planning and Zoning) of the Inglewood Municipal Code to:
  - Add the Transportation Corridor Overlay (TCO) Zone; and
  - Amend the Medical Enterprise Overlay Zone to exclude land uses associated with the Project.
- Approval of amendments to the Forum Development Agreement to reflect the acquisition of frontage along Prairie (including loss of Forum parking);
- Approval of a Special Use Permit required for demolition of a gas station, Design Review for the new supermarket, and any other discretionary approval required for a new supermarket at 500 and 510 East Manchester Boulevard;
- Approval of amendments and clarifications to the Hollywood Park Specific Plan and associated Development Agreement;
- Preparation of a Project-specific Stormwater Management Plan or Standard Urban Stormwater Mitigation Plan for approval;
- Approvals of lot line adjustment(s), parcel map(s), and tract map(s) as needed;
- Approval of agreements and/or resolutions necessary to acquire the property necessary for construction and operation of the Project, in fee simple or through easements, licenses, air rights, leases, or other means of access, including through eminent domain;
- Approval of the ITC Design Standards and Guidelines;
- Approval of a contract or contracts for the design, finance, construction, and operation of the Project;
- Approvals for federal, State, or local financing plans or grants.

In addition to the above, ministerial approvals may be required as follows:

- Grading permits, building permits, haul route approval, and other permits issued by the Department of Building and Safety for the Project and any associated Department of Public Works permits (including encroachment permits) for infrastructure improvements;
- Tree removal permits; and
- Noise permit for Construction and Building Hours extension.

- Other federal, State, or local approvals, permits, or actions that may be deemed necessary for the Project including, but not limited to, the following:
  - California Public Utilities Commission;
  - Los Angeles County Fire Department.

## **E. Contents and Location of Record**

The record upon which all findings and determinations related to the Project consists of those items listed in Public Resources Code section 21167.6 subdivision (e), which are incorporated by reference and made part of the record supporting these findings:

- The City of Inglewood General Plan and all Elements thereto, as amended from time to time through the date of approval of the Project;
- City of Inglewood Municipal Code;
- The NOP and all other public notices issued by the City in conjunction with the Project;
- The EIR and all documents referenced in or relied upon by the EIR;
- The MMRP for the Project;
- All findings and resolutions adopted by the City in connection with the Project, and all documents cited or referred to therein;
- All information including written evidence and testimony provided by City staff and consultants to the City Council relating to the EIR, the Project, and the alternatives set forth in the EIR or these CEQA findings;
- All records of decision, staff reports, memoranda, maps, exhibits, letters, synopses of meetings, and other documents approved, reviewed, relied upon, or prepared by any City commissions, boards, officials, consultants, or staff relating to the Project;
- All information provided by the public, including written correspondence received by City staff during the public comment period of the Recirculated Draft EIR.
- All testimony presented to the Planning Commission or City Council;
- All information presented at workshops or hearings held by the City for the Project.

The documents constituting the record of proceedings are available for review by responsible agencies and interested members of the public during normal business hours at the City of Inglewood Economic and Community Development Department, One West Manchester Boulevard, Fourth Floor, Inglewood, CA 90301. The custodian of these documents is the Economic and Community Development Director. The City Council has relied on all of the documents listed above in reaching its decision on the Project, even if not every document was formally presented to the Council. Without exception, any documents set forth

above not found in the Project files fall into one of two categories. In the first category, many of the documents reflect prior planning or legislative decisions of which the City Council was familiar with when approving the Project. (See *Dominey v. Dept. of Personnel Administration* (1988) 205 Cal.App.3d 729, 738, fn. 6; *City of Santa Cruz v. Local Agency Formation Com.* (1978) 76 Cal.App.3d 381, 391–392.) In the second category, documents that influenced the expert advice provided to City staff or consultants, who then provided advice to the City Council as final decision makers, form part of the underlying factual basis for the City Council’s decisions relating to approval of the Project and properly constitute part of the administrative record. (See CEQA, § 21167.6, subd. (e)(10); *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 153, 155; *Browning-Ferris Industries v. City Council* (1986) 181 Cal.App.3d 852, 866.) The City Council notes, however, that the record of proceedings does not include internal “working draft” documents that have not been shared with the public; rather, such documents reflect the practical reality that a given document often undergoes multiple drafts before it is released to the public, relied upon by the City, or presented to decisionmakers. Just as the first draft of a legal brief or of a judicial opinion is not relevant to a document in its final, filed form, the internal working draft of City staff or consultants is not relevant to the City Council’s decision. Such documents are therefore not part of the record of proceedings.

The public hearing transcript, a copy of all letters regarding the Draft EIR received during the public review period, the administrative record, and background documentation for the Final EIR, as well as additional materials concerning approval of the Project and adoption of these findings are contained in the Project files. Project files are available by contacting Mindy Wilcox, Planning Manager, at the Inglewood City Hall, Economic & Community Development Department Planning Division, One West Manchester Boulevard, Fourth Floor, Inglewood, California 90301. The City may also be contacted by e-mail at [inglewoodtransitconnector@cityofinglewood.org](mailto:inglewoodtransitconnector@cityofinglewood.org). All files have been available to the City Council and the public for review in considering these findings and whether to approve the Project.

## **F. Findings Required Under CEQA**

### **1. Findings**

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environment impacts that would otherwise occur. Mitigation measures or alternatives are not required, however, where such changes are infeasible or where the responsibility for implementing the mitigation measure or alternative resides with another agency. (Pub. Resources Code, § 21081, subd. (a)(2); CEQA Guidelines, § 15091, subds. (a), (b).)

Public Resources Code section 21061.1 defines “feasible” to mean “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.” CEQA Guidelines section 15364 includes another factor: “legal” considerations. (See also *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 565–566 (*Goleta II*).)

The concept of “feasibility” also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417.) “[F]easibility” under CEQA encompasses ‘desirability’ to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors.” (*Ibid.*; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715; see also *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1001 [after weighing “economic, environmental, social, and technological factors” an agency may conclude that a mitigation measure or alternative is “impracticable or undesirable from a policy standpoint” and reject it as “infeasible” on that ground].)

With respect to a project for which significant impacts are not avoided or substantially lessened, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project’s “benefits” rendered “acceptable” its “unavoidable adverse environmental effects.” (CEQA Guidelines, §§ 15093, 15043, subd. (b); see also Pub. Resources Code, § 21081, subd. (b).)

In seeking to effectuate the substantive policy of CEQA to substantially lessen or avoid significant environmental effects to the extent feasible, an agency, in adopting findings, need not necessarily address the feasibility of both mitigation measures and environmentally superior alternatives when contemplating approval of a Project with significant impacts. Where a significant impact can be mitigated to an “acceptable” level solely by the adoption of feasible mitigation measures, the agency, in drafting its findings, has no obligation to consider the feasibility of any environmentally superior alternative that could also substantially lessen or avoid that same impact — even if the alternative would render the impact less severe than would the Project as mitigated. (*Laurel Hills Homeowners Association v. City Council* (1978) 83 Cal.App.3d 515, 521; see also *Kings County, supra*, 221 Cal.App.3d at pp. 730-731; and *Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal.3d 376, 400–403.)

In these findings, the City first addresses the extent to which each significant environmental effect can be substantially lessened or avoided through the adoption of feasible mitigation measures. Only after

determining that, even with the adoption of all feasible mitigation measures, an effect is significant and unavoidable does the City address the extent to which alternatives described in the EIR are (i) environmentally superior with respect to that effect and (ii) “feasible” within the meaning of CEQA.

In cases in which a project’s significant effects cannot be mitigated or avoided, an agency, after adopting proper findings, may nevertheless approve the project if it first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the “benefits of the project outweigh the significant effects on the environment.” (Pub. Resources Code, § 21081, subd. (b); see also CEQA Guidelines, §§ 15093, 15043, subd. (b).) In the statement of overriding considerations found at the end of these findings, the City identifies the specific economic, legal, social, and other considerations that, in its judgment, outweigh the significant environmental effects that the Project will cause.

The California Supreme Court has stated that “[t]he wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced.” (*Goleta II, supra*, 52 Cal.3d at p. 576.)

The City Council’s findings in support of its approval of the Project are set forth below for each of the significant environmental effects of and alternatives to the Project identified in the EIR pursuant to section 21080 of CEQA and section 15091 of the CEQA Guidelines. These findings provide the written analysis and conclusions of the City Council regarding the environmental impacts of the Project and the mitigation measures included as part of the EIR and adopted by the City Council as part of the Project. To avoid duplication and redundancy, and because the City Council agrees with, and hereby adopts, the conclusions in the EIR, these findings will not repeat the analysis and conclusions in the EIR, but instead incorporates them by reference in these findings and relies upon them as substantial evidence supporting these findings.

In making these findings, the City Council has considered the opinions of staff and experts, other agencies, and members of the public. The City Council finds that the determination of significance thresholds is a judgment decision within the discretion of the City Council; the significance thresholds used in the EIR are supported by substantial evidence in the record, including the expert opinion of the EIR preparers and City staff; and the significance thresholds used in the EIR provide reasonable and appropriate means of assessing the significance of the adverse environmental effects of the Project. Thus, although, as a legal matter, the City Council is not bound by the significance determinations in the EIR (see Pub. Resources Code, § 21082.2, subd. (e)), the City Council finds them persuasive and hereby adopts them as its own.

As set forth below, the City Council adopts and incorporates all of the mitigation measures set forth in the EIR and the attached MMRP to substantially lessen or avoid the potentially significant and significant impacts of the Project.

## ***2. Findings About Significant Environmental Impacts and Mitigation Measures***

The following sections of these findings – Sections II, III and IV – set forth the City’s findings about the EIR’s determinations regarding significant environmental impacts and the mitigation measures proposed to address them. These findings provide the written analysis and conclusions of the City regarding the environmental impacts of the Project and the mitigation measures included as part of the EIR and adopted by the City as part of the Project. To avoid duplication and redundancy, and because the City agrees with, and hereby adopts, the conclusions in the EIR, these findings will not repeat the analysis and conclusions in the EIR, but instead incorporates them by reference in these findings and relies upon them as substantial evidence supporting these findings.

These findings do not attempt to describe the full analysis of each environmental impact contained in the EIR. Instead, a full explanation of these environmental findings and conclusions can be found in the EIR, and these findings hereby incorporate by reference the discussion and analysis in the EIR supporting the EIR’s determination regarding the Project’s impacts and mitigation measures designed to address those impacts. In making these findings, the City Council ratifies, adopts, and incorporates in these findings, the determinations and conclusions of the EIR relating to environmental impacts and mitigation measures, except to the extent any such determinations and conclusions are specifically and expressly modified by these findings.

As set forth below, the City Council adopts and incorporates all of the mitigation measures within its authority and jurisdiction as lead agency, as set forth in the EIR and presented in the MMRP, in order to substantially lessen or avoid the potentially significant and significant impacts of the Project. The MMRP will remain available for public review during the compliance period. In adopting mitigation measures from the EIR, the City Council intends to adopt each of the mitigation measures proposed in the EIR for the Project for adoption by the City. The City Council also intends that the MMRP should include each and every mitigation measure included in the EIR, including those assigned to responsible agencies. Accordingly, in the event a mitigation measure recommended in the EIR has inadvertently been omitted in these findings or the MMRP, any such mitigation measure is hereby adopted and/or incorporated in the findings below by reference.

In addition, mitigation measures are listed in different locations in these findings, in the MMRP, and in the EIR. The City has made every effort to ensure that the text of each mitigation measure is consistent wherever that text appears. To the extent the text differs for the same mitigation measure from one location to another, such differences are inadvertent. In those instances, the text of the mitigation measure as it appears in the MMRP shall control, unless in context it is clear that the text in the MMRP does not reflect the City's determination with respect to the mitigation measure to be adopted; in such instances, the most stringent version of the mitigation measure shall apply, regardless of whether that most stringent version appears in the findings, in the MMRP, or in the EIR.

The impact numbers and mitigation measure numbers used in these findings reflect the information contained in the EIR. In Sections II, III and IV below, the same statutory findings are made for a category of environmental impacts and mitigation measures. Rather than repeat the identical finding several times to address each and every significant effect and mitigation measure, the initial finding obviates the need for such repetition because in no instance is the City Council rejecting the conclusions of the EIR or the mitigation measures recommended in the EIR for the Project.

## **II. IMPACTS FOUND TO HAVE NO IMPACT OR BE LESS THAN SIGNIFICANT AND THUS REQUIRING NO MITIGATION**

Under CEQA, no mitigation measures are required for impacts that are less than significant (Pub. Resources Code, section §; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091). Based on substantial evidence in the entire record of this proceeding, the City Council finds that implementation of the Project will not result in any significant impacts in the following areas and that these impact areas, therefore, do not require mitigation. As stated above, these findings do not repeat the analysis and conclusions in the EIR, but instead incorporates them by reference in these findings and rely upon them as substantial evidence supporting these findings.

### **A. Aesthetics**

Impact AES-1a: Construction and operation of the Project could substantially degrade the existing visual character or quality of public views of the site and its surroundings or could conflict with the City's zoning and regulations governing scenic quality. (Refer to pages 4.1-19 through 4.1-68 of the Recirculated Draft EIR.)

Impact AES-1b: Construction and operation of the Project could be inconsistent with applicable zoning and planning regulations governing scenic quality. (Refer to pages 4.1-68 through 4.1-75 of the Recirculated Draft EIR.)

Impact AES-2: Construction and operation of the Project could create a new source of substantial light or glare, which could adversely affect day or nighttime views in the area. (Refer to pages 4.1-76 through 4.1-82 of the Recirculated Draft EIR.)

## **B. Biological Resources**

Impact BIO-2: Construction and operation of the Project could conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. (Refer to pages 4.3-52 through 4.9-62 of the Recirculated Draft EIR.)

## **C. Cultural Resources**

Impact CUL-1: Construction and operation of the Project could cause a substantial adverse change in the significance of a historic resource pursuant to Section 15064.5. (Refer to pages 4.4-45 through 4.4-60 of the Recirculated Draft EIR.)

## **D. Energy Resources**

Impact E-1: Construction and operation of the Project could result in wasteful, inefficient, or unnecessary consumption of energy resources. (Refer to pages 4.5-21 through 4.5-35 of the Recirculated Draft EIR.)

Impact E-2: Construction and operation of the Project could conflict with or obstruct a State or local plan for renewable energy or energy efficiency. (Refer to pages 4.5-35 through 4.5-38 of the Recirculated Draft EIR.)

## **E. Greenhouse Gas Emissions**

Impact GHG-1: Construction and operation of the Project could generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. (Refer to pages 4.7-42 through 4.7-49 of the Recirculated Draft EIR.)

Impact GHG-2: Construction and operation of the Project could conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. (Refer to pages 4.7-49 through 4.7-57 of the Recirculated Draft EIR.)

## **F. Hazards and Hazardous Materials**

- Impact HAZ-1: Construction and operation of the Project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (Refer to pages 4.8-31 through 4.8-38 of the Recirculated Draft EIR.)
- Impact HAZ-2: Construction and operation of the Project could emit hazardous emissions or involve the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. (Refer to pages 4.8-38 through 4.8-43 of the Recirculated Draft EIR.)
- Impact HAZ-3: Construction and operation of the Project could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (Refer to pages 4.8-44 through 4.8-47 of the Recirculated Draft EIR.)

## **G. Land Use and Planning**

- Impact LU-1: Construction and operation of the Project could physically divide an established community. (Refer to pages 4.8-49 through 4.9-47 of the Recirculated Draft EIR.)
- Impact LU-2: Construction and operation of the Project could cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. (Refer to pages 4.9-47 through 4.9-77 of the Recirculated Draft EIR.)

## **H. Noise**

- Impact NOI-1: Construction and operation of the Project could result in a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or

applicable standards of other agencies. (Refer to pages 4.10-65 through 4.10-109 of the Recirculated Draft EIR.)

Impact NOI-2: Construction and operation of the Project could result in exposure of persons to or generate excessive groundborne vibration or groundborne noise levels. (Refer to pages 4.10-109 through 4.10-116 of the Recirculated Draft EIR.)

## **I. Population, Employment, and Housing**

Impact POP-1: Construction of the Project could induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). (Refer to pages 4.11-15 through 4.11-23 of the Recirculated Draft EIR.)

## **J. Transportation**

Impact T-1: Construction and operation of the Project could conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. (Refer to pages 4.12-36 through 4.11-52 of the Recirculated Draft EIR.)

Impact T-2: Construction and operation of the Project could conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). (Refer to pages 4.12-52 through 4.11-66 of the Recirculated Draft EIR.)

Impact T-3: Construction and operation of the Project could substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (Refer to pages 4.12-66 through 4.11-67 of the Recirculated Draft EIR.)

Impact T-4: Construction and operation of the Project could conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. (Refer to pages 4.12-68 through 4.11-69 of the Recirculated Draft EIR.)

### III. SIGNIFICANT OR POTENTIALLY SIGNIFICANT IMPACTS MITIGATED TO A LESS THAN SIGNIFICANT LEVEL

The following significant and potentially significant environmental impacts of the Project, including cumulative impacts, are being mitigated to a less than significant level and are set out below. Pursuant to section 21081, subdivision (a)(1) of CEQA and section 15091, subdivision (a)(1) of the CEQA Guidelines, as to each such impact, the City Council, based on the evidence in the record before it, finds that changes or alterations incorporated into the Project by means of conditions or otherwise mitigate, avoid, or substantially lessen to a level of insignificance these significant or potentially significant environmental impacts of the Project. The basis for the finding for each identified impact is set forth below.

#### A. Air Quality

**Impact AQ-1:** Construction of the Project could conflict with or obstruct implementation of the applicable air quality plan as the Project would exceed the NOx SCAQMD threshold during construction. (Refer to pages 4.2-47 through 4.2-60 of the Recirculated Draft EIR.)

**MM AQ-1:** PDF AQ-1, Construction Air Quality Program, shall be implemented during construction of the ITC Project.

**Basis for Finding:** Mitigation Measure MM AQ-1 requires the implementation of PDF AQ-1 from the Project's Construction Commitment Program (CCP) to reduce air quality emissions during construction. PDF AQ-1 requires the Project to 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. With implementation of PDF AQ-1, this impact would be **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Recirculated Draft EIR. Impacts will be less than significant.

**Impact AQ-2:** Construction of the Project could result in a cumulatively considerable net increase of NOx emissions. (Refer to pages 4.2-61 through 4.2-70 of the Recirculated Draft EIR.)

**MM AQ-1:** PDF AQ-1, Construction Air Quality Program, shall be implemented during construction of the ITC Project.

**Basis for Finding:** Mitigation Measure MM AQ-1 requires the implementation of PDF AQ-1 from the Project's CCP to reduce air quality emissions during construction. PDF AQ-1 requires the Project to 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. With implementation of PDF AQ-1, this impact would be **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Recirculated Draft EIR. Impacts will be less than significant.

**Impact AQ-3:** The Project could expose sensitive receptors to substantial pollutant concentrations during construction. (Refer to pages 4.2-70 through 4.2-87 of the Recirculated Draft EIR.)

**MM AQ-1:** PDF AQ-1, Construction Air Quality Program, shall be implemented during construction of the ITC Project.

**Basis for Finding:** Mitigation Measure MM AQ-1 requires the implementation of PDF AQ-1 from the Project's CCP to reduce air quality emissions during construction. PDF AQ-1 requires the Project to 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. With implementation of PDF AQ-1, this impact would be **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Recirculated Draft EIR. Impacts will be less than significant.

## B. Biological Resources

**Impact BIO-1:** Construction and operation of the Project could interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. (Refer to pages 4.3-45 through 4.3-50 of the Draft EIR.)

**MM BIO-1: Conservation of Faunal Resources: Nesting Birds/Raptors.** 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 (6) months until the completion of construction activities, as specified below.
- Nesting bird survey shall include:
- Prior to any demolition and/or construction, and at least every six (6) 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 at least every six (6) 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 demolitions 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 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.

**Basis for Finding:** With the implementation of MM BIO-1, construction of the Project would no longer have the potential to disturb active nests for nesting birds and raptors. Active nests would be identified, and suitable buffers would be established to ensure that construction activities do not disturb nesting birds. Mitigation measures would thus ensure that the Project would not cause a substantial reduction in local population size or reduce reproductive success to birds and raptors. Thus, this impact would be considered **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Recirculated Draft EIR. Impacts would be reduced to less than significant.

### **C. Cultural Resources**

**Impact CUL-2:** Construction and operation of the Project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. (Refer to pages 4.4-61 through 4.4-62 of the Recirculated Draft EIR.)

**MM 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 contractor, 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 AB 52 (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(s) with the qualified archaeologist and Native American Monitor 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 the Native American Monitor. 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 Public Resources Code 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. **MM TCR-2** through **MM TCR-5** will supplement **MM TCR-1**.

**MM TCR-2: Monitoring and Mitigation Program.**

Prepare, design, and implement an Archaeological Monitoring and Mitigation Program for the 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.

**MM 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 Archaeological Monitoring and Mitigation Program as outlined in **MM 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.

**MM 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 of potential ground-disturbing activities, 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.

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 contractor regarding recommendation for treatment and ultimate disposition of the resource(s).

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.

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 contractor, 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.

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.

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.

**Basis for Finding:** With implementation of mitigation measures MM TCR-1 through MM TCR-4, construction of the Project would no longer have the potential to cause a substantial adverse change in the significance of an archaeological resource. With implementation of MM TCR-1, the City shall retain a qualified archaeologist meeting the Secretary of the Interior’s Professional Qualifications Standards for archaeology 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. With implementation of Mitigation Measure MM TCR-2, the City shall prepare, design, and implement an Archaeological Monitoring and Mitigation Program for the Project. With implementation of Mitigation Measure MM TCR-3, the qualified archaeologist and Native American Monitor shall conduct construction-worker archaeological resources sensitivity training and will present the Archaeological Monitoring and Mitigation Program for all construction personnel for the Project. With implementation of Mitigation Measure MM TCR-4, the qualified archaeologist will oversee the archaeological and Native American monitors who shall be retained to be present and work in tandem, monitoring during construction excavations as defined in the Monitoring and Mitigation Program. With implementation of Mitigation Measures MM TCR-1, MM TCR-2, MM TCR-3, and MM TCR-4, this impact would be **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Recirculated Draft EIR. Impacts would be reduced to less than significant.

**Impact CUL-3:**                   **Construction and operation of the Project could disturb any human remains, including those interred outside of formal cemeteries. (Refer to page 4.4-63 of the Recirculated Draft EIR.)**

**MM 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 contractor, 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 AB 52 (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(s) with the qualified archaeologist and Native American Monitor 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 the Native American Monitor. 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 Public Resources Code 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. **MM TCR-2** through **MM TCR-5** will supplement **MM TCR-1**.

**MM 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 Archaeological Monitoring and Mitigation Program as outlined in **MM 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.

**MM 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 Project, all work shall immediately cease within 150 feet of the discovery and the County Coroner shall be contacted in accordance with PRC Section 5097.98<sup>2</sup> and Health and Safety Code Section 7050.5.<sup>3</sup> 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

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<sup>2</sup> NAGPRA, Title 43. Public Lands: Interior, Subtitle A. Office of the Secretary of the Interior, Part 10. Native American Graves Protection and Repatriation Regulations, § 5097.98 – Notification of discovery of Native American human remains, descendants; disposition of human remains and associated grave goods.

<sup>3</sup> [California / Health and Safety Code - HSC / CHAPTER 2. General Provisions \[7050.5. - 7055.\] / Section 7050.5.](#)

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 remains (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 landowner 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. The Tribe shall approve additional types of documentation 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 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.

**Basis for Finding:** With implementation of Mitigation Measure MM TCR-1, MM TCR-3, and MM TCR-5, construction of the Project would no longer have the potential to cause a substantial adverse change in the significance of an archaeological resource. With implementation of MM TCR-1, the City shall retain a qualified archaeologist meeting the Secretary of the Interior’s Professional Qualifications Standards for archaeology 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. With implementation of Mitigation Measure MM TCR-3, the qualified archaeologist and Native American Monitor shall conduct construction-worker archaeological resources sensitivity training and will present the Archaeological Monitoring and Mitigation Program for all construction personnel for the Project. With implementation of Mitigation Measure MM TCR-5, the City and contractor shall ensure the cessation of all construction work in the event of the unanticipated discovery of human remains during excavation related to the Project. With implementation of Mitigation Measures MM TCR-1, MM TCR-3, and MM TCR-5, this impact would be **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Recirculated Draft EIR. Impacts would be reduced to less than significant.

## **D. Geology and Soils**

**Impact GEO-1:**            **The Project could directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault?**

**MM GEO-1:**    **Project Design.** The 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 or accommodate the fault rupture hazard where present with refinement of station and ATS guideway placement worked into final design as needed based on project specific geologic surveys, recommendations and criteria. 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.

**MM 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 in the Project area to support adjustments to the Project's 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 CPT [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 shall be located to avoid the fault rupture hazard where present.

Columns and foundations for the guideway and stations, as well as any other ATS facilities shall be located to avoid the fault rupture hazard where present.

Probabilistic procedures shall follow those outlined in the *Fault Rupture Hazard Evaluation (Appendix K.1)*. If further study of the fault rupture is conducted, then procedures as outlined in CGS Note 49<sup>4</sup> shall be followed.

**MM 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 (Appendix K.2)* 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 Caltrans Memo to Designers 20-10 -Fault Rupture, dated January 2013.

**Basis for Finding:** With implementation of Mitigation Measure MM GEO-1, the Project will be designed to accommodate fault rupture where present in accordance with applicable Caltrans guidelines. Moreover, stations and elevated structures for the ATS guideway shall be designed in locations avoiding or accomodating fault rupture hazards where present. With implementation of Mitigation Measure MM GEO-2, a phased investigation to further define the trend of the Townsite Fault will be conducted to support adjustments to the Project’s final design. With implementation of Mitigation Measure MM GEO-3, the ATS facilities will be designed in accordance with applicable Caltrans guidelines and seismic design criteria. With implementation of Mitigation Measures MM GEO-1, MM GEO-2, and MM GEO-3, this impact would be **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Recirculated Draft EIR. Impacts would be reduced to less than significant.

**Impact GEO-2:** **The Project could directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?**

**MM GEO-1: Project Design.** The 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

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4 California Geological Survey, Note 49: Guidelines for Evaluating the Hazard of Surface Fault Rupture, <https://www.conservation.ca.gov/cgs/Documents/Publications/CGS-Notes/CGS-Note-49.pdf>.

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 or accommodate the fault rupture hazard where present with refinement of station and ATS guideway placement worked into final design as needed based on project specific geologic surveys, recommendations and criteria. 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.

**MM 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 in the Project area to support adjustments to the Project's 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 CPT [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 shall be located to avoid the fault rupture hazard where present.

Columns and foundations for the guideway and stations, as well as any other ATS facilities shall be located to avoid the fault rupture hazard where present.

Probabilistic procedures shall follow those outlined in the *Fault Rupture Hazard Evaluation (Appendix K.1)*. If further study of the fault rupture is conducted, then procedures as outlined in CGS Note 49<sup>5</sup> shall be followed.

**MM 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 (Appendix K.2)* 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 Caltrans Memo to Designers 20-10 -Fault Rupture, dated January 2013.

**Basis for Finding:** With implementation of Mitigation Measure MM GEO-1, the Project will be designed Projectto accommodate fault rupture where present in accordance with applicable Caltrans guidelines. Moreover, stations and elevated structures for the ATS guideway shall be designed in locations avoiding or accommodating fault rupture hazards where present. With implementation of Mitigation Measure MM GEO-2, a phased investigation to further define the trend of the Townsite Fault will be conducted to support adjustments to the Project’s final design. With implementation of Mitigation Measure MM GEO-3, the City the ATS facilities will be designed in accordance with applicable Caltrans guidelines and seismic design criteria. With implementation of Mitigation Measures MM GEO-1, MM GEO-2, and MM GEO-3, this impact would be **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Recirculated Draft EIR. Impacts would be reduced to less than significant.

**Impact GEO-3:**           **The Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**MM GEO-4:** A qualified paleontologist meeting the SVP standards shall be retained by the project applicant and approved by the City prior to the approval of grading permits. The qualified paleontologist shall:

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5 California Geological Survey, Note 49: Guidelines for Evaluating the Hazard of Surface Fault Rupture, <https://www.conservation.ca.gov/cgs/Documents/Publications/CGS-Notes/CGS-Note-49.pdf>.

- a) Prepare, design, and implement a monitoring and mitigation program for the Project consistent with Society of Vertebrate Paleontology Guidelines. The Plan 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 fossil remains can be salvaged in a timely manner), fossil treatment, procurement, and reporting. The Plan monitoring and mitigation program shall be prepared and approved by the City prior to the issuance of the first grading permit. If the qualified paleontologist determines that the Project-related grading and excavation activity would not affect Older Quaternary Alluvium, then no further mitigation is required.
- b) Conduct construction worker paleontological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.) and would present the Plan as outlined in (a). In the event construction crews are phased or rotated, additional training shall be conducted for new construction personnel working on ground-disturbing activities. The training session shall provide instruction on the recognition of the types of paleontological resources that could be encountered within the Project area and the procedures to be followed if they are found. Documentation shall be retained by the qualified paleontologist demonstrating that the appropriate construction personnel attended the training.
- c) Direct the performance of paleontological resources monitoring by a qualified paleontological monitor (meeting the standards of the SVP, 2010). Paleontological resources monitoring shall be conducted pursuant to the monitoring and mitigation program developed under (a), above. Monitoring activities may be altered or ceased if determined adequate by the qualified paleontologist. Monitors shall have the authority to and shall temporarily halt or divert work away from exposed fossils or potential fossils and establish a 50-foot radius temporarily halting work around the find. Monitors shall prepare daily logs detailing the types of ground disturbing activities and soils observed, and any discoveries.
- d) If fossils are encountered, determine their significance, and, if significant, supervise their collection for curation. Any fossils collected during Project-related excavations, and determined to be significant by the qualified paleontologist, shall be prepared to the point of identification and curated into an accredited repository with retrievable storage.
- e) Prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the paleontological monitoring. If there are significant discoveries, fossil locality information and final disposition shall be included with the final report which would be submitted to the appropriate repository 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 could affect Older Quaternary Alluvium.

**Basis for Finding:** With implementation of Mitigation Measure MM GEO-4, the a paleontologist meeting the SVP Standards to prepare, design, and implement a paleontology monitoring and mitigation program for the Project consistent with SVP Guidelines will be retained. Moreover, this monitoring and mitigation program shall include education and sensitivity training for construction workers, guidelines for on-site paleontological monitors to issue stop-work orders if fossils are found, procedures for paleontological resource evaluation in the event of discovery, and final reporting procedure guidelines for submission to the City. With implementation of Mitigation Measure MM GEO-4, this impact would be **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Recirculated Draft EIR. Impacts would be reduced to less than significant.

## **E. Tribal Cultural Resources**

**Impact TCR-1: Construction and operation of the Project could cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

- i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or**
- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. (Refer to pages 4.13-22 through 4.13-31 of the Recirculated Draft EIR.)**

**MM 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 contractor, 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 AB 52 (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(s) with the qualified archaeologist and Native American Monitor 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 the Native American Monitor. 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 Public Resources Code section 5097.98, subdivision (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, subdivision (f) for historical resources and Public Resources Code section 21083.2, subdivision (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. **MM TCR-2** through **MM TCR-5** will supplement **MM TCR-1**.

**MM TCR-2: Monitoring and Mitigation Program.**

Prepare, design, and implement an Archaeological Monitoring and Mitigation Program for the 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.

**MM 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 Archaeological Monitoring and Mitigation Program as outlined in **MM 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.

**MM 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 of potential ground-disturbing activities, 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.

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 contractor regarding recommendation for treatment and ultimate disposition of the resource(s).

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.

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 contractor, 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.

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.

Prepare a final monitoring and mitigation report for submittal to the City, and the 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.

**MM 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 Project, all work shall immediately cease within 150 feet of the discovery and the County Coroner shall be contacted in accordance with Public Resources Code section 5097.98<sup>6</sup> and Health and Safety Code section 7050.5.<sup>7</sup> 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 remains (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 Public Resources Code 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

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<sup>6</sup> NAGPRA, Title 43. Public Lands: Interior, Subtitle A. Office of the Secretary of the Interior, Part 10. Native American Graves Protection and Reparation Regulations, § 5097.98 – Notification of discovery of Native American human remains, descendants; disposition of human remains and associated grave goods.

<sup>7</sup> [California / Health and Safety Code - HSC / CHAPTER 2. General Provisions \[7050.5. - 7055.\] / Section 7050.5.](#)

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 Public Resources Code 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 landowner 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. The Tribe shall approve additional types of documentation 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 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.

**Basis for Finding:** With implementation of Mitigation Measure MM TCR-1 through MM TCR-5, construction of the Project would no longer have the potential to cause a substantial adverse change in the significance of a tribal cultural resource. With implementation of MM TCR-1, the a qualified archaeologist meeting the Secretary of the Interior’s Professional Qualifications Standards for archaeology to carry out all mitigation related to cultural resources shall be retained. In addition, a Native American Monitor shall be designated by the Gabrieleno Band of Mission Indians-Kizh Nation. With implementation of Mitigation Measure MM TCR-2, the an Archaeological Monitoring and Mitigation Program for the Project will be prepared. With implementation of Mitigation Measure MM TCR-3, the qualified archaeologist and Native American Monitor shall conduct construction-worker archaeological resources sensitivity training and will present the Archaeological Monitoring and Mitigation Program for all construction personnel for the Project. With implementation of Mitigation Measure MM TCR-4, the

qualified archaeologist will oversee the archaeological and Native American monitors who shall be retained to be present and work in tandem, monitoring during construction excavations as defined in the Monitoring and Mitigation Program. With implementation of Mitigation Measure MM TCR-5, the City and contractor shall ensure the cessation of all construction work in the event of the unanticipated discovery of human remains during excavation related to the Project. With implementation of Mitigation Measures MM TCR-1, MM TCR-2, MM TCR-3, MM TCR-4 and MM TCR-5, this impact would be **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Recirculated Draft EIR. Impacts would be reduced to less than significant.

## **F. Utilities and Service Systems**

**Impact U-1:** **Construction and operation of the Project could require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. (Refer to pages 4.14-47 through 4.14-56 of the Recirculated Draft EIR.)**

**MM UT-1:** Prior to the award of the DBFOM contract, and start of any demolition or construction activities, the City or DBFOM shall be responsible for identifying the locations of existing utilities potentially affected by the 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 Project's guideway and station foundations.

Based on the information from the field investigations, the DBFOM contractor shall be responsible for confirming the location of existing utilities and 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.

**MM UT-2:** Prior to the award of the DBFOM contract, and start of construction, the City shall contact Southern California Edison (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 Project's 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.

**Basis for Finding:** With implementation of Mitigation Measure MM U-1, the City or DBFOM contractor shall be responsible for identifying the locations of existing utilities potentially affected by the Project. Moreover, the DBFOM contractor shall be responsible for confirming the location of existing utilities and 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. With implementation of Mitigation Measure MM U-2, 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 Project’s recommended full redundancy design. With implementation of Mitigation Measures MM U-1 and MM U-2, this impact would be **less than significant**.

**Finding:** Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Recirculated Draft EIR. Impacts would be reduced to less than significant.

#### **IV. EVALUATION OF PROJECT ALTERNATIVES**

The Recirculated Draft EIR identified and analyzed in detail six alternatives to the Project. These alternatives were selected for detailed analysis because, among other things, they were identified as “potentially feasible.” (CEQA Guidelines, § 15126.6, subd. (a).) Alternatives that are identified as not “potentially feasible” may be eliminated from detailed analysis in the EIR.

The City Council now adopts findings concerning the feasibility of these alternatives. In adopting these findings, the City Council has considered the Project alternatives presented and analyzed in the EIR and presented during the comment period and public hearing process. The City Council finds, based on specific economic, legal, social, technological, or other considerations, that these alternatives are infeasible. Based on the impacts identified in the Recirculated DEIR and other reasons summarized below, and as supported by substantial evidence in the record, the City Council finds that approval and implementation of the Project as proposed is the most desirable, feasible, and appropriate action and hereby rejects the other alternatives and other combinations and/or variations of alternatives as infeasible based on consideration of the relevant factors set forth in CEQA Guidelines section 15126.6, subdivision (f). (See also CEQA Guidelines, §, subd. (a)(3).)

## **A. Summary of Alternatives Considered**

CEQA mandates that an EIR evaluate a reasonable range of alternatives to the Project or the Project location that generally reduce or avoid potentially significant impacts of the Project. CEQA requires that every EIR also evaluate a “No Project” alternative. Alternatives provide a basis of comparison to the Project in terms of their significant impacts and their ability to meet project objectives. This comparative analysis is used to consider reasonable, potentially feasible options for minimizing environmental consequences of the Project. Here, the Recirculated Draft EIR identified and analyzed in detail six alternatives to the Project. These alternatives were selected for detailed analysis because, among other things, they were identified as “potentially feasible.” (CEQA Guidelines, § 15126.6, subd. (a).) The six alternatives to the Project analyzed in the Recirculated Draft EIR are the (1) No Project; (2) Bus Rapid Transit (BRT) System; (3) Market Street Pedestrian Promenade; (4) 4th Station Alternative; (5) Prairie Avenue Single Station Alternative; and (6) Maintenance and Storage Facility (MSF) Site Alternative.

The City Council rejects the Alternatives set forth in the Recirculated Draft EIR and summarized below because the City Council finds that there is substantial evidence, including evidence of economic, legal, social, technological, and other considerations described in this Section in addition to those described in Section F below under CEQA Guidelines section 15091, subdivision (a)(3), that make infeasible such Alternatives. In making these determinations, the City Council is aware that CEQA defines “feasibility” to mean “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” (CEQA Guidelines, § 15364.) The Council is also aware that under CEQA case law the concept of “feasibility” encompasses (i) the question of whether a particular alternative promotes the underlying goals and objectives of a project. and (ii) the question of whether an alternative is “desirable” from a policy standpoint to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors.

### ***Alternative 1: No Project***

#### **Description**

Under CEQA, the No Project Alternative must consider the effects of not approving the project under consideration. The No Project Alternative describes the environmental conditions that exist at the time that the environmental analysis commences, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved. (CEQA Guidelines, § 15126.6, subdivision (e)(2).)

The No Project Alternative considers conditions if the Project is not built. No new transportation infrastructure would be built within the Project study area, aside from transportation projects that are

currently under construction or funded for construction and operation by 2027. These projects include transit projects funded by Measure R, Measure M, and specified in the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Existing infrastructure and future planned and funded projects assumed under the No Project alternative include:

- Metro K Line –Currently under construction (2021), operating start date (Fall 2022)
- Implementation of the Citywide Event Transportation Management and Operations Plan
- Street improvements being constructed as part of the Los Angeles International Airport Landside Access Modernization Program and the Inglewood Basketball and Entertainment Center (IBEC) projects.
- Existing Bus Service – Metro Rapid and Metro Local

Existing public transit and private transportation operators would continue to provide service. Public transit operators would likely increase service in response to the projected growth in the number of visitors and residents that would occur as result of new and proposed major activity centers being developed in the City in the Downtown and Hollywood Park areas.

The LASED at Hollywood Park includes SoFi Stadium and additional development allowed by the Hollywood Park Specific Plan. Higher density mixed-use development is also planned in the vicinity of the Metro Downtown Inglewood station near Florence Avenue and Market Street being developed within the Crenshaw/Imperial TOD Plan Area. These projects and improvements would reasonably be expected to occur in the foreseeable future if the Project were not approved based on current plans.

Throughout 2020, the City of Inglewood developed a Citywide Transportation Management and Operations Plan (TMOP) focused on addressing future traffic demands that may result from events at the stadium. The Inglewood TMOP establishes a plan that provides public information, reduces unwarranted traffic through adjacent neighborhoods, and promotes the use of alternative modes of transportation as described below.

### ***City of Inglewood Event Park and Ride Shuttle Program and Intermodal Transit Facility at Hollywood Park***

To address the limited pre-sold on-site parking available at SoFi Stadium, the City has established a remote parking and shuttle program, known as the I Park & Go Program, which considers comprehensive access, circulation, and traffic management for residents, visitors, and businesses on NFL game days and during large special events.

Given the growing event-day demand of the City's I Park & Go Program, the City would not only continue the use at the ITF Lot but also utilize the vacant lot at the southwest corner of Prairie Avenue and Manchester Boulevard given the limited capacity for increased shuttles at the City's ITF Lot.

### ***Event Transit Service***

The City has established a partnership and received support from Metro, Big Blue Bus (Santa Monica), GTrans (Gardena), and Torrance Transit to expand transit service. Under the No Project alternative, the City would 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 by 2021, if possible. The TMOP addresses both Pre-Event and Post-Event conditions associated with SoFi Stadium at Hollywood Park. The Pre-Event scenario includes bus routes along Pincay Drive, Kareem Court, and Century Boulevard. The Post-Event scenario includes bus routes along Prairie Avenue, Manchester Avenue, Crenshaw Boulevard, Pincay Drive, Kareem Court, and Century Boulevard

### **Relationship to Project Objectives**

The No Project Alternative would not meet any of the City's objectives for the Project, except that it would maintain existing roadway capacity.

### **Comparative Impacts**

**Table 5.0-1** at the beginning of Chapter 5.0, Alternatives, of the Recirculated Draft EIR, provides an impact-by-impact comparison of the significant impacts of the Project and Alternative 1. Because no new development would occur, the effects of the No Project Alternative would be a continuation of the existing conditions. Because the Project would not be constructed or operated, none of the impacts identified for the Project would occur under the No Project alternative.

### **Basis for Finding**

While the No Project Alternative would avoid impacts associated with the Project, this alternative would not further any of the Project's objectives or provide any of the benefits contemplated by the Project. Under the No Project Alternative, VMT within the City would continue to increase due to operation of the Forum, the SoFi Stadium, the Performance Arena, the IBEC and the Hollywood Park mixed uses. An increase in VMT would worsen traffic conditions and result in an increase of air quality and greenhouse gas emissions. All of the reasons provide sufficient independent grounds for rejecting this alternative.

## Finding

Specific economic, legal, social, technological, or other considerations, make Alternative 1 infeasible.

## ***Alternative 2: Bus Rapid Transit (BRT) System***

### **Description**

Bus rapid transit (BRT) is a public transit system designed to provide improved capacity and reliability relative to a conventional bus system. Typically, a BRT system includes roadway lanes that are dedicated to buses, with signal priority to buses at intersections where buses may interact with other traffic, with enhanced coordinated flow. BRT systems typically include design features to optimize passenger boarding and alighting activities, as well as ticket purchases. A BRT corridor is a section of roadway or contiguous roadways served by the uniquely-branded buses along routes with a minimum length of approximately 1.5 to 2 miles.

Under this alternative, the City would construct and operate a BRT system that would connect the Forum, the SoFi Stadium, the Performance Arena, the IBEC, and the Hollywood Park mixed uses to the Metro K Line Downtown Inglewood station. The proposed route of this alternative would be a loop route starting along Florence Avenue to travel east to North Prairie Avenue where it would turn south along Prairie Avenue to the Inglewood Transit Center Facility at Prairie Avenue and Arbor Vitae adjacent to the Hollywood Park site, and then return via Prairie Avenue northbound to travel westbound along Manchester Boulevard to Market Street to traverse northbound to Florence Avenue. The BRT would be located entirely within the public right-of-way. This route is generally consistent with the route as described in the City's New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines.<sup>8</sup>

Along the alignment, one eastbound travel lane along Florence Avenue between Market Street and Prairie Avenue; one southbound travel lane along Prairie Avenue between Florence Avenue and Manchester Boulevard; two lanes (one lane in each direction) along Prairie Avenue between Manchester Boulevard and the Inglewood Transit Center Facility; one westbound travel lane along Manchester Boulevard between Prairie Avenue and Market Street; and one northbound lane along Market Street between Manchester Boulevard and Florence Avenue would all be converted (from the existing mixed flow traffic lanes) to provide the Bus-only lane to accommodate the BRT alternative thereby reducing roadway lane capacities for mixed-flow traffic.

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<sup>8</sup> City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, November 1, 2016

BRT systems typically include the following features:

- Dedicated lanes and alignment:
  - Separate lanes to avoid congested roadways.
  - Dedicated bus-only lanes for faster travel and to ensure that buses are not delayed by mixed traffic congestion. Separate rights of way may be used. Transit malls or “bus streets” may also be created in city centers.
- Off-board fare collection
  - Fare prepayment at the station, instead of on board the bus, eliminates the delay caused by passengers paying on board.
- Intersection treatment
  - Prohibit turns for mixed-flow traffic across the bus lane to reduce delays to the buses, in most cases. Transit Bus priority will often be provided at signalized intersections (using Transit Priority System (TPS) modules at all upgraded signal controllers at intersections along the alignment) to coordinate them to reduce delays by extending the green phase or reducing the red phase in the required direction compared to the normal sequence. Potential additional communication equipment to transmit and receive signals between the intersections and the City’s Transportation Management Center may also be provided, as part of this alternative. Equipment to track the locations of the buses and closed-circuit television cameras may also be required / provided at the intersections along the alignment to provide the required monitoring.
- Platform-level boarding
  - Station platforms/stops would be convenient for quick and easy boarding, making them fully accessible for wheelchairs and baby strollers, with minimal delays.

Passenger loading areas would include stops at the following locations:

- Market Street/Florence Avenue in close proximity to the Metro K Line Downtown Inglewood Station. This BRT stop would provide connections to and from the regional light rail system;
- The Forum on Prairie Avenue;
- The City’s Intermodal Transit Facility at Hollywood Park providing access to the SoFi Stadium, Hollywood Park Development Site, and IBEC.

High-capacity bus vehicles such as articulated buses may be used; these may have multiple doors for fast entry and exit. To reduce greenhouse gas emissions, vehicles may be electric or alternative fuel technology.

Under the BRT alternative, the Project would not be built and none of the transit infrastructure, street provisions and activities would occur.

## Relationship to Project Objectives

The BRT System Alternative would meet some, but not all of the City's objectives for the Project, but not as well as the Project. The objectives to provide a direct and convenient connection to the Metro regional transit system, encourage intermodal transportation systems by providing convenient, safe, and reliable transit and convenient access to businesses in the City would be partially met by this alternative. Although the objective related to providing sufficient transit connection capacity between Metro's regional transit system and the City's new major activity centers would not be met, this alternative would still result in limited increased transit mode split, limited reduction in vehicle trips, and consequently, limited reduction in per-capita vehicle miles traveled to the City's major activity centers. The BRT System Alternative would also partially meet the City's objectives to support the ongoing economic revitalization within the Downtown TOD Plan area and encourage redevelopment and investment within the City in areas served by the Project, but not to the same degree as the Project.

This alternative would partially meet the City's objective to support regional efforts to become more efficient, economically strong, equitable, and sustainable. Though the BRT System Alternative would provide limited operational benefits by reducing traffic volumes along key roadway corridors, it would also reduce the roadway capacities along Florence Avenue, Prairie Avenue, Manchester Boulevard, and Market Street, consequently increasing traffic congestion throughout the City. As such, this alternative would not meet the City's objectives to maintain existing roadway capacity or reduce the City's traffic congestion and alleviate growing demand on the existing roadway networks on both major arterials and residential streets for both nonevent and event days.

## Comparative Impacts

**Table 5.0-1** at the beginning of Chapter 5.0, Alternatives, of the Recirculated Draft EIR, provides an impact-by-impact comparison of the significant impacts of the Project and Alternative 2.

### 1. Aesthetics

The Project would not result in significant impacts to the aesthetic character of the community during construction or operation with implementation of the project design features in the ITC CCP and ITC Design Guidelines.

With Alternative 2, the proposed ATS guideway would not be built and existing visual characteristics along Market Street, Manchester Boulevard, and Prairie Avenue would generally be maintained. As such, there would generally be little to no impact to the aesthetic character of the community because the BRT would be contained within the existing roadway system. For this reason, no potentially significant impact to the

visual character of the area would occur with Alternative 2. The Project would change the visual characteristics of the areas located along the proposed alignment but would not result in significant impacts. While Alternative 2 would result in fewer changes to the visual character of the area than the Project, neither this alternative nor the Project would result in significant aesthetic impacts.

## **2. Air Quality**

The BRT System would require some modifications to existing streets in order to create dedicated transit lanes and stops but this construction would be less than the demolition and construction activities associated with the Project. This alternative would not conflict with implementation of the applicable air quality plans and unmitigated construction emissions would be substantially reduced compared to the Project.

Though this Alternative would reduce VMTs, it would only be able to provide approximately 20 percent of the ridership capacity compared to the Project. Moreover, Alternative 2 would reduce average daily traffic (ADT) volumes along key roadway corridors and VMTs on an average weekday basis to a lesser degree than the Project. Specifically, typical weekday nonevent and daily VMT in the City would be reduced by an amount equivalent to 20 percent to 25 percent of those of the Project. Moreover, under Alternative 2 the existing uses that would be removed by the Project would remain operational and would not be replaced by the Project components which generate less air pollutant emissions than the existing uses. As such, Alternative 2 would increase operational air quality impacts in comparison to the Project.

## **3. Biological Resources**

Approximately 502 trees are present along the Project alignment which may require removal during construction of the Project. The BRT System Alternative would only involve minor modifications to existing streets along the public right-of-way where BRT-only lanes along the route are implemented and BRT stops are constructed. Alternative 2 would not, therefore, require the same amount of potential tree removals as the Project. Similar to the Project, operation of Alternative 2 would not diminish the chances for long-term survival of bird species or their habitats and no additional tree and/or ornamental vegetation removals would occur. As such, Alternative 2 would result in similar operational impacts compared to the Project.

## **4. Cultural Resources**

The Project would not result in significant impacts to historic resources on Market Street or the other segments. Alternative 2, which would involve minor modifications of existing streets, construction of bus stops, and the operation of a Bus Rapid Transit system, would also not result in significant impacts to

cultural resources. For this reason, neither this alternative nor the Project would result in significant impacts to cultural resources.

## **5. Energy Resources**

With Alternative 2, the Project would not be built. No demolition or construction activities, which would consume energy resources would occur, except along the public right-of-way where BRT-only lanes and bus stops along the route would be located. As such, Alternative 2 would reduce construction impacts to energy resources. Operation of the Project would consume a maximum net increase of 23.85 million kWh of electricity per year. Alternative 2 would reduce operational electricity impacts. However, the Project would result in a net decrease of 3.61 million kBtu of natural gas per year. Alternative 2 would not require demolition of existing land uses and would reduce traffic along key roadway corridors and VMT on an average weekday basis to a lesser degree than the Project. For this reason, Alternative 2 would increase impacts related to natural gas and petroleum-based fuel consumption. The Project would be consistent with the ECAP and General Plan, which set goals to reduce emissions through increased energy efficiency, renewable energy generation, improved transit options, and reduced consumption and waste. Alternative 2 would address the goals and policies within these plans by improving transit options but to a lesser degree than the Project.

## **6. Geology and Soils**

Under Alternative 2, impacts related to geology and soil conditions, including paleontological resources, would be less compared to the Project. The Project is proposed in an area subject to groundshaking from earthquake events that may occur on faults in the region. Potentially active faults cross the alignment for the Project. Measures are identified to mitigate potential impacts associated with these conditions to less than significant. Because Alternative 2 would occur in the location as the Project, the geological and soils conditions that would be encountered in construction of Alternative 2 would be the similar as with the Project, but because substantially less construction would be required, potential risks associated with ground-shaking would be reduced as compared to the Project. During operations, potential risks from seismic events would be reduced with an at-grade system as no aerial structures would be built. Because there would be substantially less construction with an at-grade BRT system, the potential for accidental discovery of paleontological resources would decrease.

## **7. Greenhouse Gas Emissions**

Under Alternative 2, the Project would not be built. No demolition or construction activities which would produce GHG emissions would occur, except along the public right-of-way where BRT-only lanes and bus stops along the route would be located. As such, Alternative 2 would reduce construction GHG impacts

compared to the Project.

Though this alternative would reduce VMT, it would only be able to provide approximately 20 percent of the ridership capacity of the Project. Alternative 2 would reduce traffic along key roadway corridors and VMT on an average weekday basis to a lesser degree than the Project. Specifically, typical weekday nonevent and daily VMT in the City would be reduced by an amount equivalent to 20 percent to 25 percent of that of the Project. Additionally, dedicated bus lanes would take away roadway carrying capacity for private vehicles and increase local traffic congestion. As such, Alternative 2 would not decrease operational GHG emissions to the same degree as the Project.

Similar to the Project, Alternative 2 would be consistent with the CARB 2017 Scoping Plan Update, SCAG 2020-2045 RTP/SCS, the ECAP, and General Plan, which set goals to reduce GHG emissions by improving transit infrastructure. However, Alternative 2 would improve transit infrastructure at a lesser degree compared to the Project and would not result in more energy efficient uses being developed in place of the less energy efficient existing uses.

## **8. Hazards and Hazardous Materials**

With the BRT Transit system alternative, the Project would not be built. No construction of the guideway and stations in conjunction with the MSF and PDS substations would occur. Construction of the Project would include the demolition of existing buildings that may contain ACM and LBP. Construction activities may also encounter underground storage tanks and soil that may be contaminated. The ITC CCP requires the preparation of plans defining protocols and actions to address this potential and avoid significant impacts. Alternative 2 would not involve the demolition of existing buildings, which may have the potential to release hazardous materials, such as asbestos containing materials (ACMs), lead-based paint (LBP), and other potentially hazardous building materials. Additionally, Alternative 2 would generate a lower amount of construction emissions, which may release toxic air contaminants (TACs) at schools within one-quarter mile. Transportation of hazardous materials during construction of the Project would also not likely occur with this alternative. The potential for accidental release of hazardous materials in the environment would be significantly lessened when compared to the Project.

Operation of the Project would include the use and storage of hazardous materials during operation typical of those used in an industrial setting. Compliance with federal, State, and local laws and regulations relating to transport, storage, disposal, and handling of hazardous materials would minimize any potential for accidental release or upset of hazardous materials during station operation. Under Alternative 2, operation of a BRT system would include the use and storage of similar materials. As such, operational impacts under Alternative 2 would be similar to those of the Project.

## **9. Land Use and Planning**

Alternative 2 would not include the construction of the ATS system or any of the associated supporting facilities. The Project would remove traffic from existing roadways without diminishing the existing traffic capacity or the number of lanes. With the BRT system alternative, an existing lane of travel would be dedicated for use by buses along the route, which would reduce the lane capacity for other vehicles and increase local traffic congestion for passenger vehicles in the community. This increase in congestion on roadways under Alternative 2 would have an indirect effect on the character of the community.

Alternative 2 would be generally consistent with all existing goals, plans, and policies as it would maintain the majority of the infrastructure in the surrounding communities, allowing the goals and objectives of the existing plans to be carried out generally. Notwithstanding, in certain locations there could be conflicts with the design of existing roadways, roadway capacity, and the City's circulation element and amendments to City documents may be needed to avoid these conflicts. Land use impacts would be similar with this alternative and the Project.

## **10. Noise and Vibration**

Under Alternative 2, the Project would not be built. No demolition or construction activities which would produce noise or groundborne vibration impacts would occur, except along the public right-of-way where BRT-only lanes and bus stops are located. As such, construction noise and vibration impacts would be reduced. Though this alternative would reduce VMT, it would only be able to provide approximately 20 percent of the ridership capacity compared to the Project. Alternative 2 would reduce traffic volumes along key roadway corridors and VMT on an average weekday basis to a lesser degree than the Project. Specifically, typical weekday nonevent and daily VMT in the City would be reduced by an amount equivalent to 20 percent to 25 percent of those of the Project. With the Project, operation of the ATS trains would result in noise levels increases from a low of 0.1 dBA to a high of 1.8 dBA, and operation of the MSF would result in noise increases ranging from no increase to a high of 3.9 dBA. Under Alternative 2, the ATS would not be built or operate, and these noise increases would not occur. However, increased bus traffic on these roadways would increase the local noise levels and, as such, noise and vibration impacts associated with operation of Alternative 2 would be similar to the Project.

## **11. Population, Employment, and Housing**

The Project would have no direct impact on housing as the Project does not include the construction or demolition of any housing units. The Project would impact existing employment opportunities in the City as commercial uses that would be displaced by the Project are estimated to be approximately 464 jobs.

However, the Project would result in a net increase of approximately 11,052<sup>9</sup> FTE jobs, as estimated by the Job Co-Benefits calculation (see **Section 4.11 Population, Employment, and Housing**). The number of jobs that will be supported by the Project in the region is within the projected regional trends in the SCAG 2020-2045 RTP/SCS data and the jobs that will benefit from the Project will not directly translate into additional population growth in the region. As such, the Project would have a less than significant impact on inducing employment and population growth.

Alternative 2 would maintain the existing population and housing trends within the City and the region while having a minor impact on employment by hiring personnel for the BRT System construction and operation. As such, Alternative 2 would not significantly impact population or employment growth in the City or the region. As such, Alternative 2 would have similar impacts on population and housing conditions, although the beneficial effects of this alternative would be substantially reduced as compared to the Project.

## **12. Transportation**

Under Alternative 2, the City would construct and operate a BRT system that would connect the LASED, including the Performance Arena, other mixed uses in the Hollywood Park Specific Plan area, SoFi Stadium, the Forum, and the IBEC to the K Line Downtown Inglewood station. Under this alternative, the Project would not be built. No demolition or construction activities would occur, except along the public right-of-way where BRT-only lanes and bus stops along the route would be located. As such, Alternative 2 would reduce impacts associated with the construction of transportation facilities.

One to two roadway lanes would be lost to mixed traffic flow along the BRT alternative route depending upon location. With a maximum potential headway of approximately 3 minutes at peak times, Alternative 2 would only be able to provide approximately 20 percent of the capacity compared to the Project. The plan amendments included in the Project would not occur. The area would continue to be used by the existing commercial, recreational, and other uses.

Alternative 2 would provide operational benefits by reducing traffic volumes along key roadway corridors and VMT on an average weekday basis to a lesser degree than the Project. Specifically, typical weekday nonevent and daily VMT in the City would be reduced by an amount equivalent to 20 percent to 25 percent of those of the Project. The estimated daily BRT ridership with Event Conditions would be approximately 20 percent of the projected Project ridership. Sufficient transit connection capacity between the Metro's regional transit system and the City's new major activity centers and entertainment venues would not be provided by this alternative. Additionally, this alternative would reduce the roadway capacities along

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9 11,516 minus 464 in numbers of jobs displaced.

Florence Avenue, Prairie Avenue, Manchester Boulevard, and Market Street, consequently increasing traffic congestion areawide. In comparison, the Project would not reduce roadway capacities compared to existing conditions and would improve congestion and traffic flows areawide. As such, Alternative 2 would obtain limited operational benefits while substantially worsening traffic flows and congestion. Transportation impacts of Alternative 2 would be increased as compared to the Project.

### **13. Tribal Cultural Resources**

The Project would have a less than significant impact on Tribal Cultural Resources (TCRs). No TCRs were identified in the records around the Project site and no sensitive resources were identified. Nonetheless, the Project would include construction which would have the potential to unearth subsurface resources not previously identified. Given the level of urban development in Inglewood, the likelihood of unearthing TCRs is low but it is still a possibility. Alternative 2 would eliminate the need to construct the ATS and this potential impact to TCRs would be avoided. TCR impacts for Alternative 2 would be reduced as compared to the Project.

### **14. Utilities and Service Systems**

Under Alternative 2, the Project would not be built. No demolition or construction activities would occur, except along the public right-of-way where BRT-only lanes and bus stops along the route are located. As such, no utility lines would need to be removed or relocated along Market Street, Manchester Boulevard, or Prairie Avenue, which would reduce construction impacts.

Once operational, the Project and Alternative 2 would not require further utility upgrades or relocation of utility infrastructure, except for potential electric charging infrastructure. However, as discussed previously, operation of the Project would consume a maximum net increase of 23.85 million kWh of electricity per year. Alternative 2 would reduce operational electricity demands in comparison to the Project. However, operation of the Project would result in a net decrease of 3.61 million kBtu of natural gas per year, and a net decrease of 71.86 acre feet per year of water per year. Alternative 2 would not result in similar reductions in utility demands.

### **Basis for Finding**

Alternative 2 would avoid or lessen some of the impacts associated with the Project. However, it would also reduce the roadway capacities along Florence Avenue, Prairie Avenue, Manchester Boulevard, and Market Street, consequently increasing traffic congestion throughout the City. Moreover, this Alternative would not reduce VMT's to the same capacity as the Project. All of these reasons provide sufficient independent grounds for rejecting this alternative.

## **Finding**

Specific economic, legal, social, technological, or other considerations, make Alternative 2 infeasible.

### ***Alternative 3: Market Street Pedestrian Promenade***

#### **Description**

Under the Market Street Pedestrian Promenade Alternative, the Project and all of its components would be constructed and would operate. With this alternative, Market Street between Florence Avenue and Manchester Boulevard would be entirely closed to vehicular traffic. Regent and Queen streets would have barricades to prevent traffic from turning onto Market Street in both directions. East-west traffic along Regent Street and Queen Street would be allowed without being able to turn onto Market Street. Traffic would be diverted to surrounding streets including La Brea Avenue and Locust Street. The establishment of this pedestrian promenade would encourage pedestrian activity by improving walkability within Downtown Inglewood.

#### **Relationship to Project Objectives**

The Market Street Pedestrian Promenade Alternative would meet most of the City's objectives for the Project since the Project would still be built, and reductions to daily traffic volumes along key roadway corridors and reductions to VMTs on an average weekday basis with event would occur similar in magnitude to those associated with the Project. However, Alternative 3 would not meet the City's objective to maintain existing roadway capacity along Market Street.

#### **Comparative Impacts**

**Table 5.0-1** at the beginning of Chapter 5.0, Alternatives, of the Recirculated Draft EIR, provides an impact-by-impact comparison of the significant impacts of the Project and Alternative 3.

##### **1. Aesthetics**

With this alternative, the Project and all of its components would be constructed and operate, but Market Street between Florence Avenue and Manchester Boulevard would be closed to vehicular traffic. Alternative 3 would require the placement of barricades to prevent vehicle access. These barricades would need to be designed in a manner which would not degrade the existing visual character of Downtown. As the ATS system as would be constructed with this alternative, the aesthetic impacts of the Project would be similar to the Project.

##### **2. Air Quality**

Construction under Alternative 3 would be similar to the Project. During construction, the Project would not exceed the significance threshold for any criteria pollutant after mitigation, and impacts would be less than significant. Therefore, similar to the Project, Alternative 3 would not conflict with implementation of the applicable air quality plans and would not exceed thresholds established by the SCAQMD for criteria air pollutants.

Operational impacts associated with Alternative 3 would be similar to the Project as the Pedestrian Promenade would not generate additional air quality emissions. Moreover, reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis with event would occur similar in magnitude to those associated with the Project. As such, Alternative 3 would result in similar operational impacts compared to the Project.

### **3. Biological Resources**

Approximately 502 trees along the Project alignment may require removal during construction of the Project. The addition of a Pedestrian Promenade would not require tree removals and would likely include the planting of additional trees. As such, impacts to biological resources during construction would be reduced compared to the Project. Alternative 3 would not diminish the chances for long-term survival of bird species or their habitats and no additional tree and/or ornamental vegetation removals would be required. As such, Alternative 3 would result in similar operational impacts compared to the Project.

### **4. Cultural Resources**

Closing a portion of Market Street in downtown Inglewood to vehicle use, which would occur with Alternative 3, would not result in a significant impacts to historic resources located on Market Street. Conversion of this portion of Market Street to a pedestrian mall would not result in any additional direct or indirect impacts to historic or other cultural resource impacts compared to the Project, nor would it substantially reduce the cultural resources impacts of the Project. Neither this alternative nor the Project would result in significant impacts to cultural resources.

### **5. Energy Resources**

Energy demand from construction activities under Alternative 3 would be similar to the Project, as the ATS system would be built as proposed. The additional construction required to create the pedestrian mall would only increase these impacts incrementally. Reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis would occur similar in magnitude to those associated with the Project. As such, Alternative 3 would result in similar operational impacts compared to the Project.

## **6. Geology and Soils**

Under Alternative 3, the Project would be built but would include a pedestrian promenade on Market Street between Florence Avenue and Manchester Boulevard. Impacts related to geology and soils conditions, including paleontological resources, would be similar to those identified for the Project. Geology and soils conditions that would be encountered in construction of Alternative 3 would be the same as with the Project. The Potrero Fault lies approximately one-quarter mile to the east of the project study area; however, compliance with the California Building Code would avoid the creation of seismic hazards. Ground-disturbing activity and the potential for accidental discovery of paleontological resources would continue to be potentially significant with Alternative 3. Alternative 3 would implement similar measures as the Project to mitigate the potential impacts on paleontological resources to less than significant.

## **7. Greenhouse Gas Emissions**

Construction under Alternative 3 would be similar to the Project and would result in a similar level of GHG emissions. Reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis would occur similar in magnitude to those associated with the Project. Therefore, similar to the Project, Alternative 3 would be consistent with the CARB 2017 Scoping Plan Update, SCAG's 2020-2045 RTP/SCS, the ECAP, and General Plan, which set goals to reduce GHG emissions by increasing energy efficiency and improving transit infrastructure. Operational GHG impacts would be similar to the Project.

## **8. Hazards and Hazardous Materials**

Under Alternative 3, the Project would be built but would include the pedestrian promenade. Construction under Alternative 3 would be similar to the Project. Construction of the guideway and stations in conjunction with the MSF and PDS substations would involve the demolition of existing buildings, which may have the potential to release hazardous materials, such as ACMs, LBP, and other potentially hazardous building materials. The additional construction activities required to create the pedestrian promenade would be minor. Similar to the Project, construction activities under Alternative 3 would likely cause the temporary closure of travel lanes, roadway segments, and sidewalks along the elevated guideway and stations within the street rights-of-way.

Under Alternative 3, operation of the ATS would include the use and storage of hazardous materials typical of those used in an industrial setting, similar to the Project. Alternative 3 would not interfere with or impair the City's ability to increase public awareness or make any improvements to emergency services and warning systems during operation. Converting this portion of Market Street to a pedestrian

promenade would not involve the use of handling of any hazardous materials. With adherence to the federal, State, and local safety requirements, Alternative 3 would not conflict with the requirements of an emergency response plan or emergency evacuation plan, similar to the Project. As such, operational impacts under Alternative 3 would be similar to the Project.

## **9. Land Use and Planning**

Alternative 3 would modify existing traffic patterns and connections within the community. Vehicular connections would be reduced as Market Street between Florence Avenue and Manchester Boulevard would be closed. Vehicular traffic would need to be rerouted around the closed pedestrian promenade which may increase local traffic volume for adjacent streets. The connection between different parts of the community would not be diminished in a substantial manner as the street segment that would be closed only includes three blocks. Alternative 3 would not, therefore, divide the community physically, but may contribute to additional ground level traffic surrounding the closure.

Alternative 3 would be generally consistent with all existing goals, plans, and policies, as it would maintain the majority of the infrastructure in the surrounding community, allowing the goals and objectives of the existing plans to be carried out generally. Additionally, closure of Market Street would enable the activation and programming of Market Street, which could include open air markets, creative retail and concession spaces, recreational and open space areas, locations for public art, and locations for public gathering. This Alternative could achieve City's objective for economic development of Market Street. Conflicts with the design of existing roadways, roadway capacity, and the City's circulation element may exist and appropriate design and amendments for City documents would be needed to avoid conflicts with existing plans and policies. The land use impacts of this alternative and the Project would be similar and less than significant.

## **10. Noise and Vibration**

Construction under Alternative 3 would be similar to the Project. It is anticipated that the development of a Pedestrian Promenade along Market Street would not result in substantial noise or vibration impacts, as it would eliminate vehicle travel along Market Street between Florence Avenue and Manchester Boulevard, which would reduce roadway noise. Moreover, reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis with event would occur similar in magnitude to those associated with the Project. The operational impacts of the Project would be less than significant. As such, operational noise and vibration impacts would be reduced in comparison to the Project.

## **11. Population, Employment, and Housing**

The Project would have no direct impact on housing as the Project does not include the construction or demolition of housing units. The Project would impact existing employment opportunities in the City as commercial uses that would be displaced by the Project are estimated to be approximately 464 jobs. However, the Project would result in a net increase of approximately 11,052<sup>10</sup> FTE jobs through the Greenhouse Gas Reduction Funds, as estimated by the Job Co-Benefits calculation (see **Section 4.11 Population, Employment, and Housing**). The number of jobs that will be supported by the Project in the region is within the projected regional trends in the SCAG 2020-2045 RTP/SCS data and the jobs that will benefit from the Project will not directly translate into additional population growth in the region. As such the Project would have a less than significant impact on inducing employment and population growth.

Converting a portion of Market Street to a pedestrian mall would not result in any additional direct or indirect impacts to population, employment, and housing. Alternative 3 would maintain the existing population, employment, and housing trends within the City and the region. As such, Alternative 3 would not directly or indirectly substantially induce population in the City or the region. Employment support and would be similar to the Project under Alternative 3.

## 12. Transportation

Construction under Alternative 3 would be similar to the Project. The Project and all of its components would be constructed and operational. Market Street between Florence Avenue and Manchester Boulevard would be reconfigured to eliminate vehicular traffic north and south on Market Street. Cross traffic would be allowed on Regent Street and Queen Street without any turns to/from Market Street. The closure of Market Street would divert traffic to the surrounding streets including La Brea Avenue and Locust Street. Since the current traffic along Market Street is very low, this diversion of Market Street traffic can be accommodated along adjacent parallel streets. The operation of the ATS would be the same as planned for the Project.

Similar to the Project, Alternative 3 would result in operational benefits. Reductions to daily traffic volumes along key roadway corridors and reductions to VMTs on an average weekday basis would occur similar in magnitude to those associated with the Project. Additionally, this alternative is estimated to result in transit ridership similar to the Project. Finally, Alternative 3 would provide similar operational benefits as those of the Project relative to reduction in traffic congestion and improvement of traffic flows along key roadway facilities areawide.

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<sup>10</sup> 11,516 minus 464 in numbers of jobs displaced.

### **13. Tribal Cultural Resources**

The Project would have a less than significant impact on Tribal Cultural Resources (TCRs), No TCRs were identified in the records around the Project site and no sensitive resources were identified. Nonetheless, the Project would include construction which would have the potential to unearth subsurface resources not previously identified. Given the level of urban development in Inglewood, the likelihood of unearthing TCRs is low but it is still a possibility. Converting a portion of Market Street to a pedestrian promenade would not result in any additional impacts.

### **14. Utilities and Service Systems**

Construction and operation under Alternative 3 would be similar to the Project. Closing a portion of Market Street to vehicle traffic would only involve minor above ground street improvements. For this reason, impacts related to the construction or relocation of water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities would be similar compared to the Project.

#### **Basis for Finding**

Alternative 3 would not reduce operational impacts and would result in similar overall impacts compared to the Project. Moreover, this Alternative would result in reductions to daily traffic volumes along key roadway corridors and reductions to VMTs on an average weekday basis with event in magnitude to those associated with the Project. However, Alternative 3 would not meet the City's objective to maintain existing roadway capacity along Market Street, as it directly involves entirely closing off a portion of roadway to vehicular traffic. The Project, on the other hand, would satisfy this objective as it involves no change to roadway capacity. (See DEIR, p. 4.12-35.) This provides sufficient independent grounds for rejecting this alternative.

#### **Finding**

Specific economic, legal, social, technological, or other considerations, make Alternative 3 infeasible.

### ***Alternative 4: 4th Station Alternatives***

#### **Description**

This alternative considers the addition of a fourth station to the ATS as proposed at Manchester Boulevard, east of the Market Street/Manchester Boulevard intersection.

The station configuration would consist of a center platform with vertical circulation to an elevated passenger walkway located under the station platform level. Passengers would have access to the station

through an elevated passenger walkway. As with the other ITC stations, this additional station would consist of a center platform configuration with the platform located at level 3 (approximately 50 feet above the existing grade). Passengers would access the platform from a mezzanine (at level 2) connected by elevated passenger walkways to vertical circulation elements to provide access to the sidewalk (at level 1) on the north side of Manchester Boulevard. Providing this additional station in Downtown would:

1. Support ongoing economic revitalization in Downtown Inglewood;
2. Provide a direct connection from Downtown Inglewood to the regional rail system, the Forum, the LASED, including SoFi Stadium, and the IBEC; and
3. Enhance the connection of Inglewood and residents to jobs, education, services, and destinations within the City and within the region; and support regional efforts to become more efficient, economically strong, equitable, and sustainable.

### **Relationship to Project Objectives**

The 4<sup>th</sup> Station Alternative would meet all of the City's objectives for the Project since the Project would still be built and reductions to daily traffic volumes along key roadway corridors and reductions to VMTs on an average weekday basis with event would occur similar in magnitude to those associated with the Project.

### **Comparative Impacts**

**Table 5.0-1** at the beginning of Chapter 5.0, Alternatives, of the Recirculated Draft EIR, provides an impact-by-impact comparison of the significant impacts of the Project and Alternative 4.

#### **1. Aesthetics**

Under the 4<sup>th</sup> station alternative, impacts to visual character under aesthetics would be similar to the Project. The Project would not result in significant impacts to the aesthetic character of the community during construction or operation with implementation of the project design features in the CCP and Design Guidelines. The addition of a 4<sup>th</sup> station east of the intersection of Market Street and Manchester Boulevard would not result in any additional visual impacts as this station would be integrated into the design of the ATS consistent with the Design Guidelines.

#### **2. Air Quality**

Under Alternative 4, the Project would be built but would include an additional station along Manchester Boulevard. During construction, the Project would not exceed the significance threshold for any criteria pollutant after mitigation, and impacts would be less than significant. The construction of a 4<sup>th</sup> station

would require additional construction activities including operation of off-road heavy-duty equipment and on-road trucks for hauling which would increase air quality emissions. Though Alternative 4 would implement similar mitigation measures as the Project, it would increase construction impacts.

Operation of the ATS with a 4<sup>th</sup> station would not result in any additional operational air quality emissions. Operational air quality impacts would be similar with this alternative and the Project.

### **3. Biological Resources**

Approximately 502 trees are located along the proposed ATS alignment that may require removal during construction of the Project. The 4<sup>th</sup> station would be located along the guideway within the public right-of-way along Manchester Boulevard. With Alternative 4, no additional properties would need to be acquired and no additional demolition of buildings or site improvements would be required. Alternative 4 would not require an increase in tree removals or disturbance of nesting raptors or migratory birds. For this reason, impacts to biological resources during construction would be similar compared to the Project. Moreover, operation of Alternative 4 would not diminish the chances for long-term survival of bird species or their habitats and no additional tree and/or ornamental vegetation removals would be planned. As such, Alternative 4 would result in similar operational impacts compared to the Project.

### **4. Cultural Resources**

Alternative 4 would have impacts on cultural resources similar to the Project. Alternative 4 would construct the ATS guideway on the same alignment with the same dimensions as the Project. The additional station would not result in any additional impacts because the additional station and this segment of the guideway would be constructed above the nearby historic resource, the Bank of America building at 320 Manchester Boulevard. The Bank of America building would retain its ability to convey its historical significance without additional indirect impact to the view of its primary façade. As such impacts to cultural resources would be similar for Alternative 4 and the Project.

### **5. Energy Resources**

Under Alternative 4, the Project would be built but would include an additional station along Manchester Boulevard. Construction of a 4<sup>th</sup> station would result in an incremental increase in energy resource consumption for electricity and petroleum-based fuels for construction of this station. However, this increase would be minimal and temporary, similar to the Project. Nonetheless construction impacts to energy resources would increase incrementally compared to the Project.

Operation of a 4<sup>th</sup> station would increase consumption of energy resources including electricity and natural gas. This alternative would result in reductions to daily traffic volumes along key roadway corridors

and VMT on an average weekday basis would occur similar in magnitude to those estimated for the Project, although the addition of a 4th station could incrementally increase ridership. As such, this alternative would result in a reduction of petroleum-based fuel consumption from vehicle travel similar or to a slightly greater degree than the Project. The addition of one station would not increase energy resource consumption to a level of significance.

## **6. Geology and Soils**

Under Alternative 4, the Project would be built but would include an additional station along Manchester Boulevard. Impacts related to geology and soils conditions, including paleontological resources, and potential conflict with an emergency evacuation plan, would be similar to those described for the Project. Geology and soils conditions that would be encountered in construction of Alternative 4 would be the same as with the Project. The Potrero Fault lies approximately one-quarter mile to the east of the project study area; however, compliance with the California Building Code would avoid the creation of seismic hazards. Ground-disturbing activity and the potential for accidental discovery of paleontological resources would continue to be potentially significant under Alternative 4. Alternative 4 would implement similar measures as the Project to mitigate the potential impacts on paleontological resources to less than significant.

## **7. Greenhouse Gas Emissions**

Under Alternative 4, the Project would be built but would include an additional station along Manchester Boulevard. Construction of a 4th station would require additional construction activities including operation of off-road heavy-duty equipment and on-road trucks for hauling which would increase GHG emissions. However, similar to the Project, these emissions would be temporary in nature and cease once the Project is complete. Nonetheless, construction related GHG emissions would increase under Alternative 4.

Operation of a 4th station would incrementally increase operational GHG emissions. However, this alternative would result in reductions to daily traffic volumes along key roadway corridors and VMT on an average weekday basis would occur similar in magnitude to those estimated for the Project. As such, this alternative would result in a net negative GHG emissions associated with vehicle travel. The addition of one station would not increase operational GHG emissions to a level of significance. Moreover, similar to the Project, Alternative 4 would be consistent with the CARB 2017 Scoping Plan Update, SCAG 2020-2045 RTP/SCS, the ECAP, and General Plan, which set goals to reduce GHG emissions by increasing energy efficiency and improving transit infrastructure. Nonetheless, operational GHG emissions would increase incrementally with Alternative 4.

## **8. Hazards and Hazardous Materials**

Under Alternative 4, the Project would be built but would include an additional station along Manchester Boulevard. Although construction of an additional station would increase construction activities compared to the Project, construction impacts under Alternative 4 would be similar to those of Project. Construction of the guideway and four stations in conjunction with the MSF and PDS substations would still involve the demolition of existing buildings, which may have the potential to release hazardous materials, such as ACMs, LBP, and other potentially hazardous building materials. Furthermore, excavations of potentially contaminated soils may occur during construction of Alternative 4 as a result of prior uses on some of the sites, similar to the Project.

Under Alternative 4, operation would include the use and storage of hazardous materials typical of those used in an industrial setting, similar to the Project. Alternative 4 would not interfere with or impair the City's ability to increase public awareness or make any improvements to emergency services and warning systems during operation. With adherence to the federal, State, and local safety requirements, Alternative 4 would not conflict with the requirements of an emergency response plan or emergency evacuation plan, similar to the Project. As such, operational impacts under Alternative 4 would be similar when compared to the Project.

## **9. Land Use and Planning**

Alternative 4 would build an ATS similar to the Project with a 4<sup>th</sup> station located on Manchester Boulevard. The Project would not physically divide the community with its elevated guideways and maintenance of existing roadway capacity and roadway connections. Alternative 4 would have an alignment and elevated guideways similar to the Project. As such, Alternative 4 would also maintain the existing roadway capacity and roadway connections. Alternative 4 could activate foot traffic and interest on Market Street and help reinvigorate the Downtown business area. Alternative 4 will have a similar impact on physically dividing the community as the Project.

Alternative 4 would be generally consistent with the existing plans, policies and guidelines in the City and the greater region. Alternative 4 would require the same amendments to the Land Use Element, Circulation Element, Safety Element, Environmental Justice Element, and the Inglewood Municipal Code as the Project to incorporate the ATS into the language of the existing plans, policies, and guidelines within the City. As such, land use impacts of Alternative 4 would be similar to the Project with neither this alternative nor the Project resulting in significant land use impacts.

## **10. Noise and Vibration**

Under Alternative 4, the Project would be built but would include an additional station along Manchester Boulevard. Construction of a 4<sup>th</sup> station would require additional construction activities including operation of off-road heavy-duty equipment and on-road trucks for hauling which could increase construction noise and vibration levels. Though Alternative 4 would implement similar mitigation measures as the Project, it would increase construction noise and vibration impacts.

Alternative 4 would result in reductions to daily traffic volumes along key roadway corridors and VMT on an average weekday basis would occur similar or slightly increased in magnitude to those estimated for the Project. As such, this alternative would result in similar or slightly increased roadway noise levels as the Project. The addition of one station would not increase operational noise or vibration levels to a level of significance.

## **11. Population, Employment, and Housing**

The Project would have no direct impact on housing as the Project does not include the construction or demolition of any housing units. The Project would impact existing employment opportunities in the City as commercial uses that would be displaced by the Project are estimated to be approximately 464 jobs. However, the Project would result in a net increase of for approximately 11,052<sup>11</sup>FTE jobs as estimated by the Job Co-Benefits calculation (see **Section 4.11 Population, Employment, and Housing** of the Recirculated Draft EIR). The number of jobs that will be supported by the Project in the region is within the projected regional trends in the SCAG 2020-2045 RTP/SCS data and the jobs that will benefit from the Project will not directly translate into additional population growth in the region. As such the Project would have a less than significant impact on inducing employment and population growth.

Alternative 4 would have a similar effect on the population and employment trend as the ATS would be constructed and the same displacement of jobs and hiring of ATS personnel would occur. As such, Alternative 4 would have similar population, employment, and housing impacts as the Project.

## **12. Transportation**

Under Alternative 4, the Project would be built but would include an additional station along Manchester Boulevard. Construction of a 4<sup>th</sup> station would require additional construction activities including operation of off-road heavy-duty equipment and on-road trucks for hauling which could increase transportation effects and disruptions.

The weekday daily VMT would be reduced in the Future Opening Year (2027) with Event conditions similar to the VMT reductions estimated for the Project. The estimated daily ITC ridership during Future Opening

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11 11,516 minus 464 in numbers of jobs displaced.

Year (2027) with NFL Event conditions are estimated to be approximately 29,300 passengers similar to the Project. The weekday daily VMT would be reduced in the Future Horizon Year (2045) with Event conditions similar to the VMT reductions estimated for the Project. The estimated daily ITC ridership during Future Horizon Year (2045) with an NFL Event conditions are estimated to be approximately 34,650 passengers, similar to the Project. Additionally, daily traffic volumes would decrease along key travel corridors such as Prairie Avenue, Manchester Boulevard and Century Boulevard, thereby reducing congestion and improving travel conditions on a system-wide basis.

Similar to the Project, Alternative 4 would result in operational benefits. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur similar in magnitude to those estimated for the Project. This alternative is estimated to result in ITC ridership similar to the Project. Improved traffic flows and reduction in congestion along key travel corridors, similar to those associated with the Project would occur with Alternative 4.

### **13. Tribal Cultural Resources**

The Project would have a less than significant impact on Tribal Cultural Resources (TCRs). No TCRs were identified in the records around the Project site and no sensitive resources were identified. Nonetheless, the Project as proposed would include construction which would have the potential to unearth subsurface resources not previously identified. Given the level of urban development in Inglewood, the likelihood of unearthing TCRs is low but it is still a possibility. The 4<sup>th</sup> station alternative would have a similar impact to TCRs as the Project since extensive construction and excavation of soil would be required to construct the ATS structure and the 4<sup>th</sup> station. Similar impacts to the TCRs would result from the Project and Alternative 4.

### **14. Utilities and Service Systems**

The 4<sup>th</sup> station would be located along the guideway within the public right-of-way along Manchester Boulevard. Under Alternative 4, no additional properties would need to be acquired and no additional demolition of buildings and site improvements would be required. As such impacts related to the construction or relocation of water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities would be similar to the Project.

### **Basis for Finding**

Alternative 4 would meet all of the City's objectives for the Project and would reduce VMTs in a similar magnitude to the Project, but would provide little benefit to ridership. The area of the additional stop under this Alternative is already sufficiently serviced by existing public bus stops. Moreover, Alternative 4

would result in increased construction and operational impacts compared to the Project. Alternative 4 would also be substantially more expensive than the Project. This provides sufficient independent grounds for rejecting this alternative.

## **Finding**

Specific economic, legal, social, technological, or other considerations, make Alternative 4 infeasible.

## ***Alternative 5: Prairie Avenue Single Station Alternative***

### **Description**

The Project modifies and relocates Prairie Avenue to the east to maintain the current roadway capacity. The relocation of Prairie Avenue and the need for a passenger station connection on the sidewalk/ground level affects properties located east of Prairie Avenue. This Alternative avoids affecting these properties by consolidating the two proposed stations on Prairie Avenue into a single station that would be located adjacent to the City's Intermodal Transit Facility at the City's Civic Center site. Passengers would connect to the ground/sidewalk level within the City-owned Civic Center site.

This Alternative maintains Prairie Avenue within its existing right-of-way; however, one to two lanes would be lost, thereby reducing the capacity of the roadway. Specifically, one travel lane in each direction along Prairie Avenue between Arbor Vitae and La Palma, one lane in the southbound direction between La Palma and Pincay Drive, and one lane in each direction between Pincay Drive and Manchester Boulevard would be lost under this Alternative 5: Prairie Avenue Single Station Alternative.

### **Relationship to Project Objectives**

Alternative 5 would meet, or partially meet, most of the City's objectives for the Project. Alternative 5 would reduce the City's traffic congestion and alleviate growing demand on the existing roadway network, although to a slightly lesser degree than the Project. Specifically, the Prairie Avenue Single Station Alternative would result in a reduction in capacities along Prairie Avenue, and traffic flow and congestion on a system-wide basis would be increased compared to those estimated for the Project. However, several of the City's objectives would be met to the same extent as under the Project. For example, by eliminating one of the stations, Alternative 5 would not meet the objective of encouraging intermodal transportation systems by providing convenient, reliable time-certain transit to the same degree as would the Project. Eliminating a station would also not meet the objective of providing convenient access to businesses, and to connect the City by providing transit within safe and accessible walking distances to the same degree as would the Project.

## **Comparative Impacts**

**Table 5.0-1** at the beginning of Chapter 5.0, Alternatives, of the Recirculated Draft EIR, provides an impact-by-impact comparison of the significant impacts of the Project and Alternative 5.

### **1. Aesthetics**

Under Alternative 5, the Project would not result in significant impacts to the aesthetic character of the community during construction or operation with implementation of the project design features in the ITC CCP and Design Guidelines. Similarly, Alternative 5 would travel down the same alignment with the same proposed and elevated guideway across the frontage of the buildings on Market Street. No additional impacts on the visual character of downtown would result from the consolidation and relocation of the single station along Prairie Avenue.

### **2. Air Quality**

Under Alternative 5, the Project would be built but the two proposed stations along Prairie Avenue would be consolidated into a single station that would be located adjacent to the City's Civic Center site. The construction of a single station along Prairie Avenue instead of two stations would result in less construction activities compared to the Project. Similar to the Project, Alternative 5 would not conflict with implementation of the applicable air quality plans or exceed thresholds established by the SCAQMD for criteria air pollutants. Moreover, Alternative 5 would implement similar mitigation measures as the Project and would reduce construction air quality emissions.

Operation of a single station along Prairie Avenue instead of two stations would slightly decrease operational air quality emissions. However, under Alternative 5, mobile operational benefits would be less than those associated with the Project. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur, but approximately 15 percent less in magnitude than those associated with the Project. As such, operational air quality emissions associated mobile sources would increase compared to the Project.

### **3. Biological Resources**

Approximately 502 trees which may require removal during construction of the Project exist along the Project alignment. With Alternative 5, no additional properties would need to be acquired and no additional demolition of buildings or site improvements would be required. The guideway would still be constructed along the same segment of Prairie Avenue compared to the Project. As such, Alternative 5 would not require an increase or decrease in tree removals or disturbance of nesting raptors or migratory birds. As such, impacts to biological resources during construction would be similar compared to the

Project. Similar to the Project, operation of Alternative 5 would not diminish the chances for long-term survival of bird species or their habitats and no additional tree and/or ornamental vegetation removals would be planned. As such, Alternative 5 would result in similar operational impacts compared to the Project.

#### **4. Cultural Resources**

Alternative 5 would have a less than significant impact on cultural resources, similar to the Project. The consolidated and relocated station on Prairie Avenue would have no impact and would not be located near any identified historical resources. As such, impacts to cultural resources would be similar for Alternative 5 and the Project.

#### **5. Energy Resources**

Under Alternative 5, the Project would be built but the two proposed stations along Prairie Avenue would be consolidated into a single station that would be located adjacent to the City's Civic Center site. Construction of a single station in place of two stations would result in an incremental decrease of energy resource consumption for electricity and petroleum-based fuels associated with operation of the station.

Operation of a single station along Prairie Avenue instead of two stations would also slightly decrease operational energy resource consumption. However, under Alternative 5, mobile operational benefits would be less than those associated with the Project. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur, but approximately 15 percent less in magnitude than those associated with the Project. As such, Alternative 5 would result in an increase in petroleum-based fuel consumption compared to the Project.

#### **6. Geology and Soils**

Under Alternative 5, the Project would be built but the two proposed stations along Prairie Avenue would be consolidated into a single station that would be located adjacent to the City's Civic Center site. Impacts related to geology and soils conditions, including paleontological resources, and potential to conflict with an emergency evacuation plan, would be similar to those described for the Project. Geology and soils conditions that would be encountered in construction of Alternative 5 would be the same as with the Project. The Potrero Fault lies approximately one-quarter mile to the east of the project study area; however, compliance with the California Building Code would avoid the creation of seismic hazards. Ground-disturbing activity and the potential for accidental discovery of paleontological resources would continue to be potentially significant under Alternative 5 and would require the same mitigation measures as identified for the Project in order to reduce the impact to less than significant.

## **7. Greenhouse Gas Emissions**

The construction of a single station along Prairie Avenue instead of two stations would result in a reduction in the level of construction activities compared to the Project. As such Alternative 5 would reduce construction related GHG emissions.

Operation of a single station along Prairie Avenue instead of two stations would also slightly decrease GHG emissions resulting from operation of the stations. However, under Alternative 5, mobile operational benefits would be less than those associated with the Project. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur, but approximately 15 percent less in magnitude than those associated with the Project. However, similar to the Project, Alternative 5 would be consistent with the CARB 2017 Scoping Plan Update, SCAG 2020-2045 RTP/SCS, the ECAP, and General Plan, which set goals to reduce GHG emissions by increasing energy efficiency and improving transit infrastructure. Nonetheless, operational GHG emissions associated mobile sources would increase compared to the Project.

## **8. Hazards and Hazardous Materials**

While construction of a single station along Prairie Avenue instead of two stations would result in a reduction in the level of construction activities compared to the Project, construction impacts under Alternative 5 would be similar to those of the Project. Construction of the guideway and stations in conjunction with the MSF and PDS substations would still involve the demolition of existing buildings, which may have the potential to release hazardous materials, such as ACMs, LBP, and other potentially hazardous building materials. Furthermore, excavations of potentially contaminated soils may occur during construction of Alternative 5 as a result of prior uses on some of the sites, similar to the Project. Similar to the Project, construction activities under Alternative 5 would likely cause the temporary closure of travel lanes, roadway segments, and sidewalks along the elevated guideway and stations within the street rights-of-way.

Under Alternative 5, operation would include the use and storage of hazardous materials typical of those used in an industrial setting, similar to the Project. Alternative 5 would not interfere with or impair the City's ability to increase public awareness or make any improvements to emergency services and warning systems during operation. With adherence to the federal, State, and local safety requirements, Alternative 5 would not conflict with the requirements of an emergency response plan or emergency evacuation plan, similar to the Project. As such, operational impacts under Alternative 4 would be similar when compared to the Project.

## 9. Land Use and Planning

Alternative 5 would involve building and operating an ATS system similar to the Project while consolidating the two proposed stations on Prairie Avenue to one single station adjacent to the Civic Center Site on Prairie Avenue. The Project would not physically divide the community with its elevated guideways and maintenance of existing roadway capacity and roadway connections. Alternative 5 would have a similar alignment and elevated guideways similar to the Project. As such, Alternative 5 would also maintain the existing roadway capacity and roadway connections. Alternative 5 would have a similar impact on physically dividing the community as the Project.

Alternative 5 would be generally consistent with the existing plans, policies and guidelines in the City and the greater region. Alternative 5 would include the same amendments to the Land Use Element, Circulation Element, Safety Element, Environmental Justice Element, and the Inglewood Municipal Code as the Project to incorporate the ATS into the language of the existing plans, policies, and guidelines within the City. As such, the policy consistency impacts of Alternative 5 would be similar to the Project.

## 10. Noise and Vibration

The construction of a single station along Prairie Avenue instead of two stations would result in a reduction in the level of construction activities compared to the Project. For this reason, Alternative 5 would reduce construction related noise and vibration levels.

Operation of a single station along Prairie Avenue instead of two stations would also slightly decrease operational noise and vibration levels. However, under Alternative 5, mobile operational benefits would be less than those associated with the Project. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur, but approximately 15 percent less in magnitude than those associated with the Project. As such, operational noise and vibration impacts associated mobile sources would increase compared to the Project.

## 11. Population, Employment, and Housing

The Project would have no direct impact on housing as the Project does not include the construction or demolition of any housing units. The Project would impact existing employment opportunities in the City as commercial uses that would be displaced by the Project are estimated to be approximately 464 jobs. However, the Project would result in a net increase of for approximately 11,052<sup>12</sup>FTE jobs through the Greenhouse Gas Reduction Funds, as estimated by the Job Co-Benefits calculation (see **Section 4.11 Population, Employment, and Housing**). The number of jobs that will be supported by the Project in the

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12 11,516 minus 464 in numbers of jobs displaced.

region is within the projected regional trends in the SCAG 2020-2045 RTP/SCS data and the jobs that will benefit from the Project will not directly translate into additional population growth in the region. As such the Project would have a less than significant impact on inducing employment and population growth.

Alternative 5 would have a similar effect on the population and employment trend as the ATS would be constructed as planned. Alternative 5 would have a similar impact to the population, employment, and housing resource as compared to the Project.

## **12. Transportation**

Under Alternative 5, the Project would be built but the two proposed stations along Prairie Avenue would be consolidated into a single station that would be located adjacent to the City's Civic Center site. The Project modifies and relocates Prairie Avenue to the east to maintain the current roadway capacity. This relocation in conjunction with the need for a passenger station connection to the sidewalk/ground level affects properties located east of Prairie Avenue. Alternative 5 avoids affecting these properties by consolidating the two proposed stations along Prairie Avenue into a single station that would be located adjacent to the Intermodal Transit Facility at the City's Civic Center site. This alternative maintains Prairie Avenue within its existing right-of-way; however, one to two lanes would be lost reducing the capacity of the roadway. Specifically, one travel lane in each direction along the Prairie Avenue roadway between Arbor Vitae and La Palma, one lane in the southbound direction between La Palma and Pincay Drive, and one lane in each direction between Pincay Drive and Manchester Boulevard would be lost under Alternative 5.

Under Alternative 5, operational benefits would be less than those associated with the Project. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur, but approximately 15 percent less in magnitude than those associated with the Project. Alternative 5 is estimated to result in transit ridership equivalent to approximately 75 percent of the transit ridership associated with the Project. However, due to a reduction in capacities along Prairie Avenue, traffic flow and congestion in the surrounding area would be worse under Alternative 5 compared to the Project.

## **13. Tribal Cultural Resources**

The Project would have a less than significant impact on Tribal Cultural Resources (TCRs), No TCRS were identified in the records around the Project site and no sensitive resources were identified. Nonetheless, the Project as proposed would include construction which would have the potential to unearth subsurface resources not previously identified. Given the level of urban development in Inglewood, the likelihood of

unearthing TCRs is low but it is still a possibility. Alternative 5 would result in similar potential impacts to TCRs as the Project since excavation of soil would be required to construct the ATS system along the proposed alignment, including a single station on Prairie Avenue. Similar impacts to the TCRs are anticipated for the Project and Alternative 5.

#### **14. Utilities and Service Systems**

The proposed Prairie station under Alternative 5 would be located within the City's Civic Center site. The guideway would still be constructed along the same segment of Prairie Avenue compared to the Project. As such, impacts related to the construction or relocation of water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities would be similar compared to the Project.

#### **Basis for Finding**

Alternative 5 would result in similar impacts compared to the Project. Alternative 5 would reduce the City's traffic congestion and alleviate growing demand on the existing roadway network, although to a slightly lesser degree than the Project. Moreover, Alternative 5 would not meet the objective of encouraging intermodal transportation systems by providing convenient, reliable time-certain transit to the same degree as would the Project. Eliminating a station would also not meet the objective of providing convenient access to businesses, and to connect the City by providing transit within safe and accessible walking distances to the same degree as would the Project. Alternative 5 would also not meet the goal of maintaining roadway capacity because it will reduce eliminate one to two lanes on Prairie Avenue. This provides sufficient independent grounds for rejecting this alternative.

#### **Finding**

Specific economic, legal, social, technological, or other considerations, make Alternative 5 infeasible.

### ***Alternative 6: Maintenance and Storage Facility (MSF) Site Alternative***

#### **Description**

The Project involves siting the MSF within the southeastern portion of the site at 500 E. Manchester Boulevard closest to the corner of Nutwood Street and Spruce Avenue that contains a Vons grocery store and gas station, with other businesses, including a private gym, bank branch and coffee shop located in the building with Vons. This siting of the MSF requires removal of the gas station currently located on the Vons site in order to provide for short-term construction staging to construct the MSF and, thereafter, to provide parking.

This Alternative moves the MSF to the northwestern portion of this property closest to the south corner of Hillcrest Boulevard and Manchester Boulevard. The site containing the MSF would be approximately 14,000 square feet in size.

This alternative would have the same elevated profile and footprint of the MSF and its supporting facilities (e.g., access, circulation, employee parking, etc.). With this alternative, the existing gas station would remain on the site. Under this Alternative, the building containing the grocery store and other businesses would be demolished. With the Project, a replacement Vons store would be built on the corner of Manchester Boulevard and Hillcrest Boulevard. With this alternative a replacement Vons store would not be built on this site.

### **Relationship to Project Objectives**

Alternative 6 would meet most of the City's objectives since the Project would still be built and reductions to daily traffic volumes along key roadway corridors and reductions to VMTs on an average weekday basis with event would occur similar in magnitude to those associated with the Project. Alternative 6, however, would not meet the objective to encourage redevelopment and investment within the City in areas served by the Project to the same degree as would the Project because Alternative 6 would not include replacement of the existing Vons grocery store on the MSF site.

### **Comparative Impacts**

**Table 5.0-1** at the beginning of Chapter 5.0, Alternatives, of the Recirculated Draft EIR, provides an impact-by-impact comparison of the significant impacts of the Project and Alternative 6.

#### **1. Aesthetics**

The Project would not result in significant impacts to the aesthetic character of the community during construction or operation with implementation of the project design features in the ITC CCP and Design Guidelines. Similarly, Alternative 6 would travel down the same alignment with the same proposed and elevated guideway across the frontage of the buildings on Market Street. No additional impacts on the visual character of downtown would result from moving the MSF to the northwestern portion of the Vons site closest to the south corner of Hillcrest Boulevard and Manchester Boulevard.

## **2. Air Quality**

Construction under Alternative 6 would be similar to the Project. During construction, the Project would not exceed the significance threshold for any criteria pollutant after mitigation, and impacts would be less than significant. Similar to the Project, Alternative 6 would not conflict with implementation of the applicable air quality plans and would not exceed thresholds established by the SCAQMD for criteria air pollutants.

Operational impacts associated with Alternative 6 would be similar to the Project as the ATS would be built as proposed. Moreover, reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis with event would occur similar in magnitude to those associated with the Project. As such, Alternative 6 would result in similar operational impacts compared to the Project.

## **3. Biological Resources**

Approximately 502 trees which may require removal during construction of the Project exist along the Project alignment. With Alternative 6, no additional properties would need to be acquired and no additional demolition of buildings or site improvements would be required. As such, impacts to biological resources during construction would be similar compared to the Project. Similar to the Project, operation of Alternative 6 would not diminish the chances for long-term survival of bird species or their habitats and no additional tree and/or ornamental vegetation removals would be planned. As such, Alternative 6 would result in similar operational impacts compared to the Project.

## **4. Cultural Resources**

Alternative 6 would have a less than significant impact on cultural resources, similar to the Project. The relocated MSF on the northwest portion of its site would have no impact on cultural resources and would not be located near any identified historical resources. For this reason, impacts to cultural resources would be similar for Alternative 6 and the Project.

## **5. Energy Resources**

Energy demand from construction activities under Alternative 6 would be similar to the Project as the ATS would be built as proposed. Reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis would occur similar in magnitude to those associated with the Project. As such, Alternative 6 would result in similar operational impacts compared to the Project.

## **6. Geology and Soils**

Impacts related to geology and soils conditions, including paleontological resources, would be similar to those identified for the Project. Geology and soils conditions that would be encountered in construction of Alternative 6 would be the same as with the Project. The Potrero Fault lies approximately one-quarter mile to the east of the project study area; however, compliance with the California Building Code would avoid the creation of seismic hazards. Ground-disturbing activity and the potential for accidental discovery of paleontological resources would continue to be potentially significant with Alternative 6. Alternative 6 would implement similar measures as the Project to mitigate the potential impacts on paleontological resources to less than significant.

## **7. Greenhouse Gas Emissions**

Construction under Alternative 6 would be similar to the Project and would result in a similar level of GHG emissions. Reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis would occur similar in magnitude to those associated with the Project. Therefore, similar to the Project, Alternative 6 would be consistent with the CARB 2017 Scoping Plan Update, the SCAG 2020-2045 RTP/SCS, the ECAP, and General Plan, which set goals to reduce GHG emissions by increasing energy efficiency and improving transit infrastructure. Operational GHG impacts would be similar to the Project.

## **8. Hazards and Hazardous Materials**

Under Alternative 6, the MSF would be relocated to the northwestern portion of the Vons site. Construction under Alternative 6 would be similar to the Project. Construction of the guideway and stations in conjunction with the MSF and PDS substations would involve the demolition of the existing building, which may have the potential to release hazardous materials, such as ACMs, LBP, and other potentially hazardous building materials. Similar to the Project, construction activities under Alternative 6 would likely cause the temporary closure of travel lanes, roadway segments, and sidewalks along the elevated guideway and stations within the street rights-of-way. Construction of Alternative 6, however, would not involve demolition of the existing gas station at the MSF site, thereby resulting in a slightly reduced potential for the potential release of hazardous materials.

Under Alternative 6, operation of the ATS would include the use and storage of hazardous materials typical of those used in an industrial setting, similar to the Project. Alternative 6 would not interfere with or impair the City's ability to increase public awareness or make any improvements to emergency services and warning systems during operation. With adherence to the federal, State, and local safety requirements, Alternative 6 would not conflict with the requirements of an emergency response plan or

emergency evacuation plan, similar to the Project. As such, operational impacts under Alternative 3 would be similar to the Project.

## **9. Land Use and Planning**

Alternative 6 would include the construction and operation of an ATS system similar to the Project while moving the MSF along Hillcrest Boulevard between Manchester Boulevard and Nutwood Street. With this alternative the existing gas station on this property would be retained, but the existing commercial building containing the grocery store and other businesses would be demolished. Under the Project a replacement Vons store would be constructed on the corner of Manchester Boulevard and Hillcrest Boulevard. Under Alternative 6, however, a replacement grocery store would not be provided on this site. Nevertheless, the community is served by other grocery stores and the loss of this store is not considered a significant land use impact for this reason.

The Project would not create a physical division of the existing community as the ATS guideway and stations would be elevated and the existing configuration of travel lanes on Market Street, Manchester Boulevard and Prairie Avenue would be maintained.

Alternative 6 would be generally consistent with the existing regional and local land use plans and policies. Alternative 6 would require the same amendments to the Land Use Element, Circulation Element, Safety Element, Environmental Justice Element, and the Inglewood Municipal Code as the Project to incorporate the ATS system into these plans and regulations.

## **10. Noise and Vibration**

Construction under Alternative 6 would be similar to the Project and would result in similar noise levels. Moreover, Alternative 6 would implement similar mitigation measures as the Project to reduce construction noise and vibration impacts to less than significant. Alternative 6 would result in reductions to daily traffic volumes along key roadway corridors and VMT on an average weekday basis would occur similar in magnitude to those estimated for the Project. As such, this alternative would result in similar roadway noise levels as the Project. Neither this alternative or the Project would result in significant noise and vibration impacts.

## **11. Population, Employment, and Housing**

The Project would have no direct impact on housing as the Project does not include the construction or demolition of housing units. The Project would impact existing employment opportunities in the City as commercial uses that would be displaced by the Project are estimated to be approximately 464 jobs.

However, the Project would result in a net increase of approximately 11,052<sup>13</sup> FTE jobs through the Greenhouse Gas Reduction Funds, as estimated by the Job Co-Benefits calculation (see **Section 4.11 Population, Employment, and Housing**). The number of jobs that will be supported by the Project in the region is within the projected regional trends in the SCAG 2020-2045 RTP/SCS data and the jobs that will benefit from the Project will not directly translate into additional population growth in the region. As such the Project would have a less than significant impact on inducing employment and population growth.

Alternative 6 would result in the demolition of the existing Vons grocery store and other businesses on site (with the exception of the existing gas station). It is possible that these businesses might choose not to relocate, which would result in corresponding job losses. Overall, alternative 6 would maintain the existing population, employment, and housing trends within the City and the region. As such, Alternative 6 would not directly or indirectly substantially induce population in the City or the region. Employment support and would be similar to the Project under Alternative 6.

## **12. Transportation**

Construction under Alternative 6 would be similar to the Project. The Project and all of its components would be constructed and operate. The operation of the ATS would be the same as planned for the Project.

Similar to the Project, Alternative 6 would result in operational benefits. Reductions to daily traffic volumes along key roadway corridors and reductions to VMTs on an average weekday basis would occur similar in magnitude to those associated with the Project. Additionally, this alternative is estimated to result in transit ridership similar to the Project. Finally, Alternative 6 would provide similar operational benefits as those of the Project relative to reduction in traffic congestion and improvement of traffic flows along key roadway facilities areawide.

## **13. Tribal Cultural Resources**

The Project would have a less than significant impact on Tribal Cultural Resources (TCRs), No TCRs were identified in the records around the Project site and no sensitive resources were identified. Nonetheless, the Project as proposed would include construction which would have the potential to unearth subsurface resources not previously identified. Given the level of urban development in Inglewood, the likelihood of unearthing TCRs is low but it is still a possibility. Relocating the MSF to the northwestern portion of the Vons site would not result in any additional impacts.

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13 11,516 minus 464 in numbers of jobs displaced.

## **14. Utilities and Service Systems**

Construction and operation under Alternative 6 would be similar to the Project. For this reason, impacts related to the construction or relocation of water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities would be similar compared to the Project.

### **Basis for Finding**

Alternative 6 would result in similar impacts compared to the Project. Alternative 6 would result in reductions to daily traffic volumes along key roadway corridors in a similar magnitude to those associated with the Project. However, Alternative 6 would not meet the objective to encourage redevelopment and investment within the City to the same degree as would the Project because Alternative 6 would not include replacement of the existing Vons grocery store on the MSF site. This provides sufficient independent grounds for rejecting this alternative.

### **Finding**

Specific economic, legal, social, technological, or other considerations, make Alternative 6 infeasible.

### **Conclusion**

The Project meets all the City's goals and objectives to deliver a world-class transportation system and provide a direct connection between downtown Inglewood and the major activity centers to the Metro Regional rail system. Compared to other alternatives reviewed and rejected, the ITC presents the opportunity for integration with local economic activity, current and future transit-oriented development, and support for the revitalization of the downtown/commercial district of Inglewood. The Project is anticipated to generate a high transit ridership, will meet the City's operational demands during events and non-event days and represents one of the most cost-effective transit solutions compared to other alternatives, avoids significant construction impacts to the adjacent commercial uses, and avoids acquisition of residential property along the alignment. Other alternatives considered are fundamentally inconsistent with City goals. The Fairview Heights Alternative connecting Florence Avenue onto Prairie Avenue would potentially impact the Inglewood Cemetery and does not generate economic development opportunities within the City. The Alternative on Arbor Vitae Street, whose right-of-way ranges from 100 feet to 66 feet, would potentially require acquisition of existing small businesses and possible residential neighborhood displacement. The Century Boulevard Alternative had many major utility conflicts and would have major design challenges as the transition from an elevated segment to a level sufficient under the I-405 may not be feasible due to the short distance

available and the real estate constraint between Century Boulevard and the LAX LAMP Manchester Square development.

An Interlined Operability Scenario was also initially studied by LA Metro and the City of Inglewood and was determined to be infeasible due to the cost and complexity of this type of system and extension of the Metro K Line. Underground APM options were preliminarily reviewed and rejected due to the significantly higher costs and conflicts with the major underground utilities along Prairie Avenue. Transitioning from an underground to an elevated option along Prairie would cut off major roadways at the transition - a fatal flaw to traffic circulation and capacity. An at-grade transit system along Market Street was initially considered but determined to be infeasible because it would result in significant traffic impacts, would not have the capacity to meet peak ridership demands, and would be more costly to build and/or operate than the proposed Project. The BRT option would be located entirely within the public right-of-way, would include bus-only lanes that would reduce roadway lane capacities for mixed-flow traffic, and would not provide the level of service of capacity desired for event days.

The Market Street Promenade Alternative would not meet goal of maintaining roadway capacity, could potentially hurt local businesses, and is generally deemed premature until temporary closures of Market Street are activated for occasional events, such as farmer's markets, block parties, and art walks. The 4th Station Alternative is rejected because it is too expensive, increases construction related impacts along Manchester Boulevard and would have negative impacts on adjacent sidewalks without providing a substantial increase in transit ridership. While a Prairie Avenue Single Station Alternative meets some City objectives, it would not provide the highest levels of service and acceptable walk distances to the various event venues. Lastly, the MSF site alternative is rejected because the City has identified a more suitable location for the MSF and is collaborating with the Vons to replace the new supermarket at its current location.

Based on the technical evaluation and public stakeholder input, the Project provides a convenient, reliable, time-certain transit connectivity to the City's major employment, housing, and activity centers from the regional Metro Rail system, achieving new economic and air quality benefits to the City of Inglewood and the Southern California region.



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# Notice of Exemption

# Notice of Exemption

To: Office of Planning and Research  
P.O. Box 3044, Room 113  
Sacramento, CA 95812-3044

From: (Public Agency): City of Inglewood  
One West Manchester Boulevard  
Inglewood CA 90301

County Clerk

County of: Los Angeles  
12400 Imperial Hwy.  
Norwalk CA 90650

(Address)

Project Title: Inglewood Transit Connector (ITC) Project

Project Applicant: City of Inglewood

Project Location - Specific: The ITC Project is proposed on Market St., Manchester Blvd. and Prairie Avenue

Project Location - City: Inglewood Project Location - County: Los Angeles

Description of Nature, Purpose and Beneficiaries of Project: The ITC Project is a 1.6-mile, three station, fully elevated electrically powered Automated Transit System (ATC) proposed to close the last-mile gap between the LA Metros K Line light rail system to major new housing, employment and activity centers in the City, including the Forum, the Los Angeles Sports and Entertainment District, which includes SoFi Stadium and the Inglewood Basketball and Entertainment Center. The ITC Project also includes a maintenance and storage facility for the ATS trains, two power distribution substations to provide power to the ATS system and surface public parking facilities at the Market St./Florence Ave. Station, the maintenance and storage facility and at 150 Market St.

Name of Public Agency Approving Project: City of Inglewood

Name of Person or Agency Carrying Out Project: City of Inglewood

Exempt Status: (check one):

- Ministerial (Sec. 21080(b)(1); 15268);
- Declared Emergency (Sec. 21080(b)(3); 15269(a));
- Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- Categorical Exemption. State type and section number: \_\_\_\_\_
- Statutory Exemptions. State code number: Pub. Resources Code, § 21080, subd. (b)(12), CEQA Guidelines § 15275(b)

Reasons why project is exempt: The ITC Project is a "facility extension" of the LA Metro K Line light rail line is less than 4 miles in length at 1.6 miles and the project will close the existing last mile gap between the Metro K Line and new housing, employment and activity centers in the City of Inglewood and is required for the transfer of passengers to and from the Metro K Line and these housing, employment centers in the City.

Lead Agency  
Contact Person: Mindy Wilcox Area Code/Telephone/Extension: (310) 412-5230

If filed by applicant:

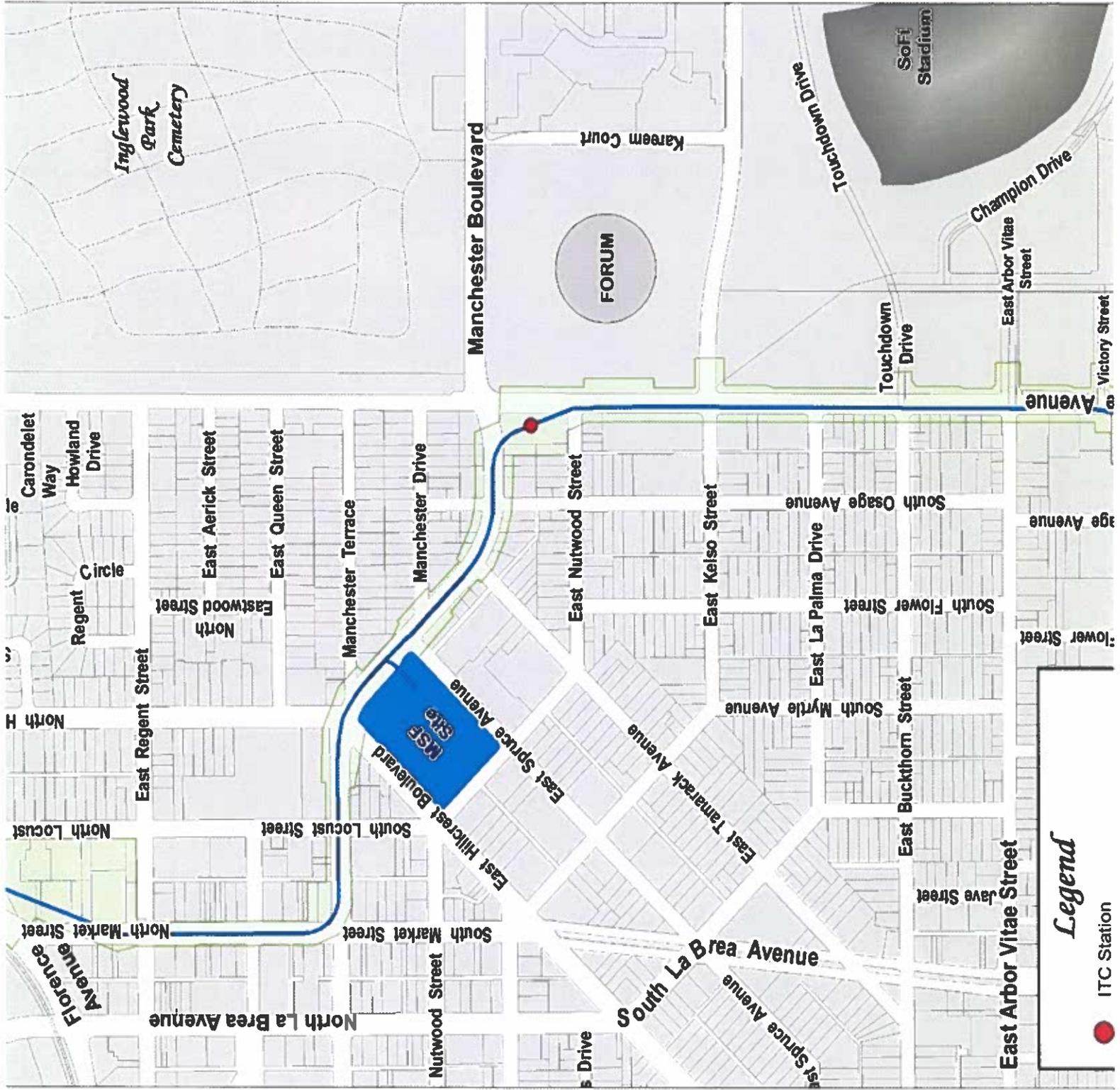
1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project?  Yes  No

Signature: [Signature] Date: 4/13/22 Title: PW Director

Signed by Lead Agency      Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.  
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: \_\_\_\_\_



*Legend*

● ITC Station