CITY OF INGLEWOOD

DEVELOPMENT SERVICES DEPARTMENT

Planning Division

Inglewood All-America City 2009

Christopher E. Jackson, Sr.
Director

NOTICE OF EXEMPTION

Prepared in accordance with California Environmental Quality Act (CEQA) Section No. 15300, and the Inglewood Municipal Code, the following Notice of Exemption is made.

Project Title:	Site Plan Review No. 23-00145 (SPR23-00145)
CEQA Case No.:	EA-CE-2024-020
Associated Projects:	None
Location:	3820 W 102nd Street
Zoning:	M-1L (Limited Manufacturing)
Project Sponsor:	Ardeshir Tavangarian
Address:	10490 Santa Monica Boulevard, Los Angeles, CA 90025
Agency Contact:	Angel Leon-Martell, Assistant Planner
Telephone:	(310) 412-5230

Project Description:
Site Plan Review to allow a 15-story, approximately 310,300 square feet hotel with 174 guest rooms on an approximately 1.2-acre, M-1L (Limited Manufacturing) zoned property.

Exempt Status:
Categorical Exemption: **Class 32: In-Fill Development Projects - Section 15332**

Reasons for Exemption:
CEQA exempts projects characterized as in-fill development meeting the following conditions:
(a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
(b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
(c) The project site has no value as habitat for endangered, rare or threatened species.
(d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
(e) The site can be adequately served by all required utilities and public services.

Signature: E. Ikemefuna
Name: Eddyfunn Ikemefuna, M.PL.
Title: Senior Planner
Date: February 7, 2024

ESA

626 Wilshire Boulevard
Suite 1100
Los Angeles, CA 90017
213.599.4300 phone
213.599.4301 fax

www.esassoc.com

Technical Memorandum

date	January 24, 2024
to	City of Inglewood
from	Ruta Thomas, Senior Vice President/Southern CA Regional Director Marlie Long, Planner III
subject	**Class 32 Categorical Exemption for the Arya Hotel Project**

Introduction

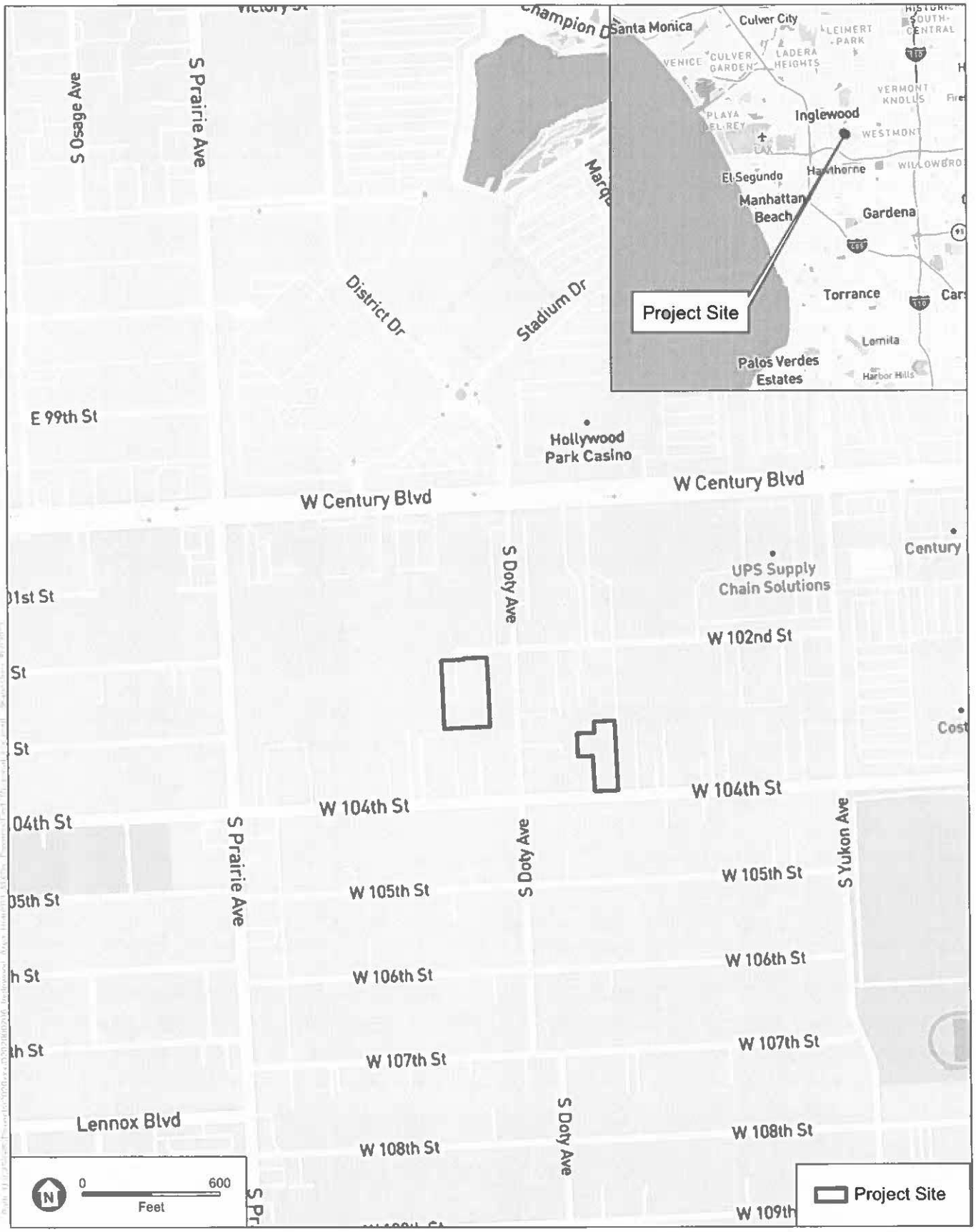
ESA has prepared this analysis to assist the City of Inglewood with their assessment of the potential for environmental effects associated with the Arya Hotel Project ("Project"), pursuant to the California Environmental Quality Act (CEQA). The analysis below, along with supporting technical studies, concludes that the Project (described in more detail below) qualifies under CEQA for a Class 32 (Infill Development) Categorical Exemption, that it would not have a significant effect on the environment, and is exempt from review under CEQA.

Project Description

Project Location and Existing Conditions

As shown in **Figure 1,** *Regional Location*, the Project Site is located in the southwestern portion of the City of Inglewood, approximately 10 miles south/southwest of downtown Los Angeles. The Project Site is located south of the Hollywood Park Specific Plan (HPSP) area, across West Century Boulevard. The HPSP area includes a new National Football League stadium (SoFi Stadium), which is the home of the Los Angeles Rams and Los Angeles Chargers teams. The HPSP also authorizes development of retail, office, residential, special events venue, and parking development. The Project Site is also located immediately adjacent to the Inglewood Basketball and Entertainment Center (Intuit Dome), which was approved by the Inglewood City Council on July 21, 2020, and is currently under construction with an opening date in 2024.

The Project Site is situated approximately 1.5 miles east of the Los Angeles International Airport (LAX) and approximately 1.5 miles north of the Hawthorne Municipal Airport. The Site is less than one mile from the Los Angeles County Metropolitan Transportation Authority (Metro) "C"/Green Line's Hawthorne/Lennox Station. The Metro "C" Line provides light rail service between Redondo Beach and Norwalk and serves the communities of El Segundo, Hawthorne, South Los Angeles, Lynwood, and Downey. Currently under construction, the Metro Crenshaw/LAX "K" Line will provide a new light rail connection between the existing Metro Exposition Line and the Metro "C" Line. The "K" Line will serve the cities of Los Angeles, Inglewood, Hawthorne, and El Segundo, and portions of unincorporated Los Angeles County. The "K" Line will also provide light rail service to LAX. The Project Site is also served by multiple Metro bus lines including bus lines 117, 211/215, 212, and The Link – Lennox.



SOURCE: California Air Resources Board, March 2004

Inglewood Arya Hotel Project

Figure 1
Regional Location

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Regional access to the Project Site is via Interstate 405 (I-405), located approximately 1.5 miles to the west; the Century Freeway (I-105), located approximately one mile to the south; and the Harbor Freeway (I-110) located 3.5 miles to the east. Local access to the Project Site is provided by West 102nd Street, which borders the Project Site to the north. West Century Boulevard, which is located one block north of the Project Site, is a commercial corridor that runs east-west through the City of Inglewood. Prairie Avenue, which is also a major commercial corridor, is located approximately one block to the west and provides north-south access through the City of Inglewood and beyond.

The approximately 2.0-acre Project Site consists of four parcels and is located in the City's developing sports and entertainment district, which is generally comprised of The Forum, Hollywood Park, Intuit Dome and associated nearby amenities. The three parcels on W. 102nd Street would be developed with a hotel and associated uses and the parcel on W. 104th Street would include the construction of a City water well. The three parcels would be located at 3812, 3818 and 3820 W. 102nd Street, and the fourth parcel would be located at 3729 W. 104th Street. The three parcels along W. 102nd Street are approximately 1.4 acres in size and are currently developed with a low-level commercial building totaling 17,855 square feet (sf) which would be demolished and removed to support development of the hotel (hereinafter collectively referred to as the Hotel Site). The fourth parcel along W. 104th Street is approximately 0.6 acre and is a vacant lot. This parcel will serve as the Well Relocation Site. **Figure 2,** *Aerial of Project Site and Vicinity*, provides an aerial view of the Project Site and its surroundings.

Planning and Zoning

Both the Hotel Site and the Well Relocation Site are designated as Industrial in the City's General Plan and are zoned as Limited Manufacturing (M-1L) and are included in the Inglewood International Business Park Specific Plan (IIBP). [1],[2] In addition, the Project Site is located within the Planning Boundary/Airport Influence Area for LAX, as designated within the Los Angeles County Airport Land Use Plan (ALUP).[3] Specifically, the Project Site falls within the 65 CNEL noise contour for the LAX Airport Influence Area.

Surrounding Uses and Development

The Project Site is located in the vicinity of the City's growing sports and entertainment district. Although the Project area will be undergoing transformation, the Project Site is currently surrounded by a mix of low- to medium-density residential, commercial, and industrial uses. Surrounding land uses are as follows:

- North – West 102nd Street is directly adjacent to the Project Site, with undeveloped land and industrial uses beyond.
- South – Undeveloped land is directly adjacent to the Project Site, with single-family residences beyond.
- East – Single- and multi-family residences are directly adjacent to the Project Site, with South Doty Avenue beyond.
- West – The Inuit Dome construction site is directly adjacent to the Project Site.

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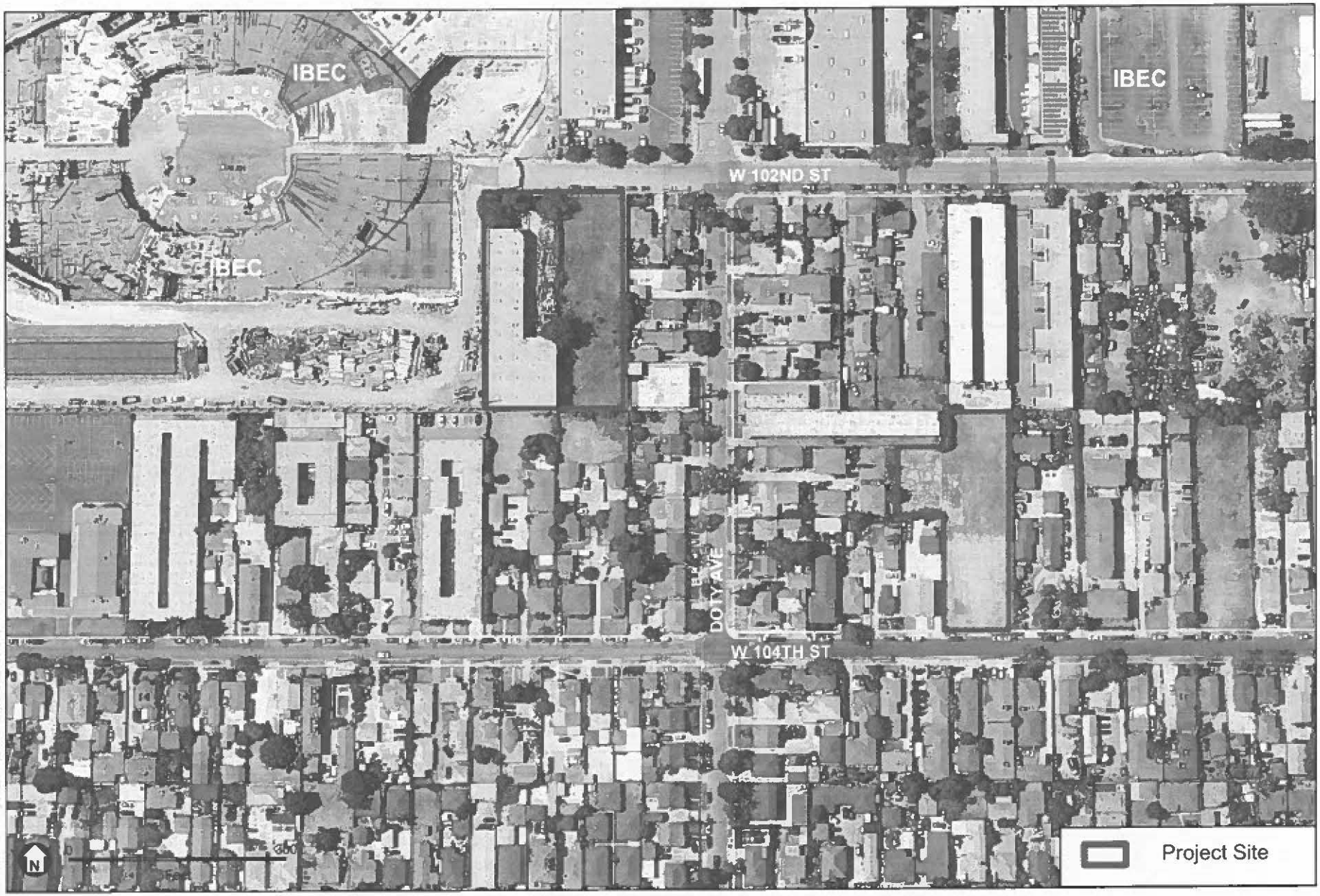
1 City of Inglewood, 2017. General Plan Land Use Map. https://www.cityofinglewood.org/209/Inglewood-General-Plan. Accessed August 2022.

2 City of Inglewood, 2022. CityInglewoodZoning. https://gisweb.cityofinglewood.org/arcgis/rest/services/CityInglewoodZoning/MapServer. Accessed August 2022.

3 Los Angeles County Airport Land Use Commission, 2009. A-NET. https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=acf2e87194a54af9b266bf07547f240a. Accessed August 2022.



SOURCE: Google Earth Pro, 2022; ESA, 2022

Inglewood Arya Hotel Project

Figure 2

Aerial of Project Site and Vicinity

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In addition, the Project Site is south of the future hotel and parking site proposed under the Intuit Dome project and west of the future City of Inglewood freshwater Well Relocation Site. The Intuit Dome will consist of an 18,000-seat sports and entertainment arena that will serve as the home court for the National Basketball Association Los Angeles Clippers, as well as provide a venue for a multitude of events, including concert, family and other traveling shows, civic events, and major conferences and conventions.

The Project Site is located south of the HPSP area, which includes SoFi Stadium, the home of the Los Angeles Rams and Los Angeles Chargers teams. The HPSP provides for the development of retail, office, and residential uses. In addition, there are religious and educational facilities in the Project vicinity, including Morningside High School and Monroe Middle School, which are located approximately 0.3 and 0.6 miles southeast, respectively, of the Project Site, an early childhood education center (Crystal Stairs, Inc.), located approximately 530 feet southwest of the Project Site, and the Inglewood Southside Christian Church, located approximately 620 feet southwest of the Project Site. The Forum, an approximately 18,000-seat entertainment venue, is also located approximately one mile north of the Project Site, near the intersection of South Prairie Avenue and Manchester Boulevard.

Project Characteristics

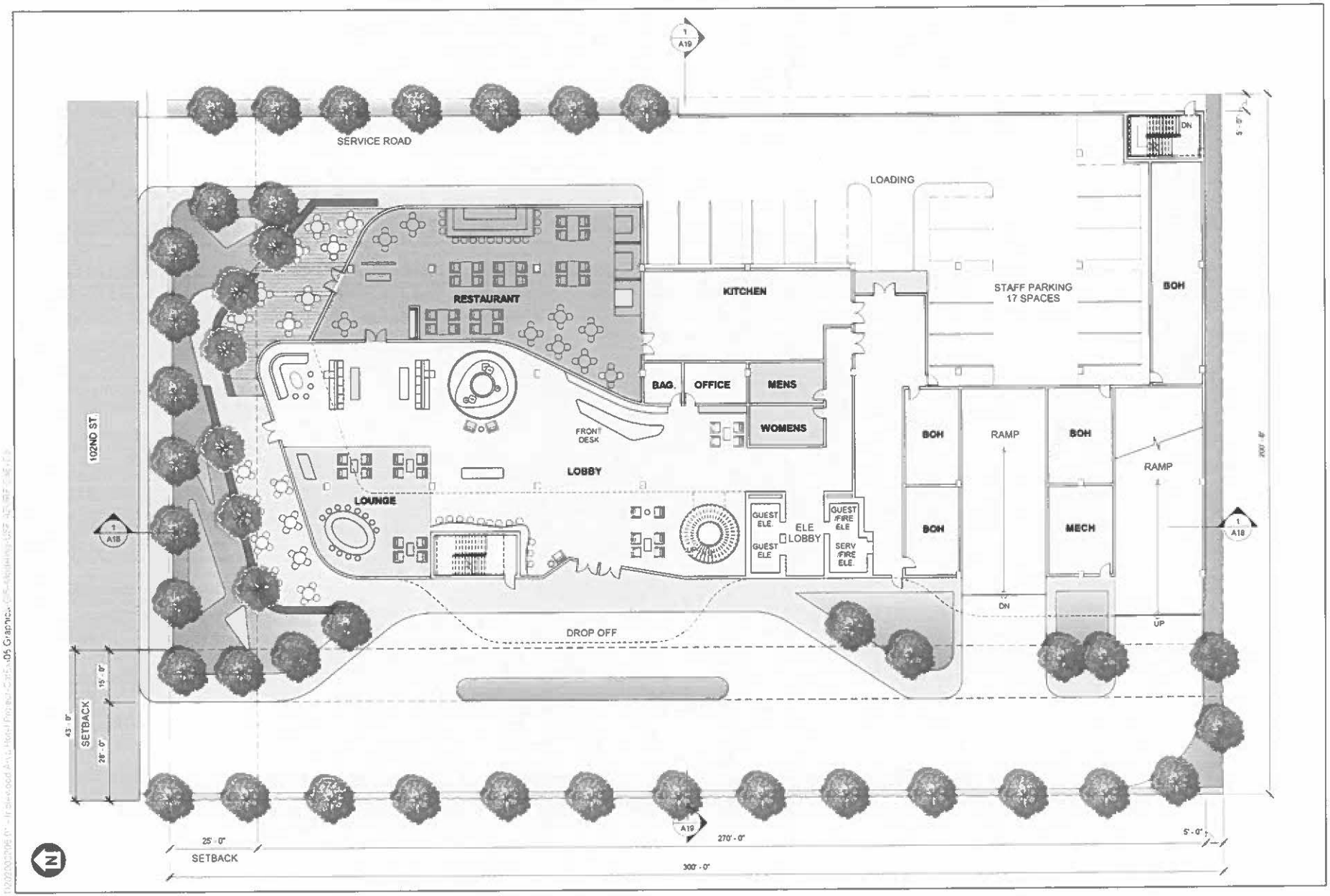
Hotel Site

The Project Site consists of the Hotel Site, comprised of three parcels located at 3812, 3818 and 3820 W. 102nd Street, and the Well Relocation Site, located at 3729 W. 104th Street. The Hotel Site would be developed with a 15-story, approximately 310,339 sf (not including balconies or roof decks) luxury hotel with 58,760 sf of parking area. The hotel would be developed with 174 guest rooms and a range of amenities, including 3,255 sf of office space for hotel staff and employees, 6,537 sf of hotel restaurants, 1,310 sf lounge space, 4,000 sf of spa and fitness amenities, and 4,000 sf dedicated to a private club/lounge, similar to other "members-only" clubs such as the Grand Club provided at Hyatt hotels or the Ritz Carlton Club Level provided at Ritz Carlton hotels. The hotel would also include 32,759 sf of landscaped terraces and rooftop space that would feature an outdoor deck, garden, and swimming pool. The hotel also includes 17,058 sf of balcony space accessible through guest rooms from the fourth to fifteenth level.

Parking would be provided in three levels which include two levels of podium parking and one level of subterranean parking (B1) (58,760 sf) that can accommodate a total of 269 vehicles. Specifically, 127 spaces would be provided in the subterranean level, 62 spaces would be provided on level 2A, 63 spaces would be provided on level 2B, and 17 staff-only spaces would be provided on level 1 behind the hotel.

Landscaping for the hotel would consist of 32,759 sf of outdoor space including a landscaped patio on level 1, an outdoor deck and swimming pool on level 3, an outdoor garden on level 4, and rooftop space on level 15 that would feature an outdoor deck and water feature. The hotel also includes 17,058 sf of balcony space accessible through guest rooms from levels 4 through 15, as well as balcony space accessible from the private club on level 15.

Figure 3, *Floor Plan Level 1*, **Figure 4,** *Floor Plan Levels 2A and 2B*, **Figure 5,** *Floor Plans Level 3 and 4*, **Figure 6,** *Floor Plan Levels 5 through 14*, **and Figure 7,** *Floor Plan Level 15 and Rooftop*, provide a visual representation of the different levels of the hotel building. Elevations of the hotel building are provided in **Figure 8,** *Eastern and Northern Building Elevations*, and **Figure 9,** *Western and Southern Building Elevations.*



SOURCE: ARYA, 2021

Inglewood Arya Hotel Project

Figure 3
Floor Plan Level 1

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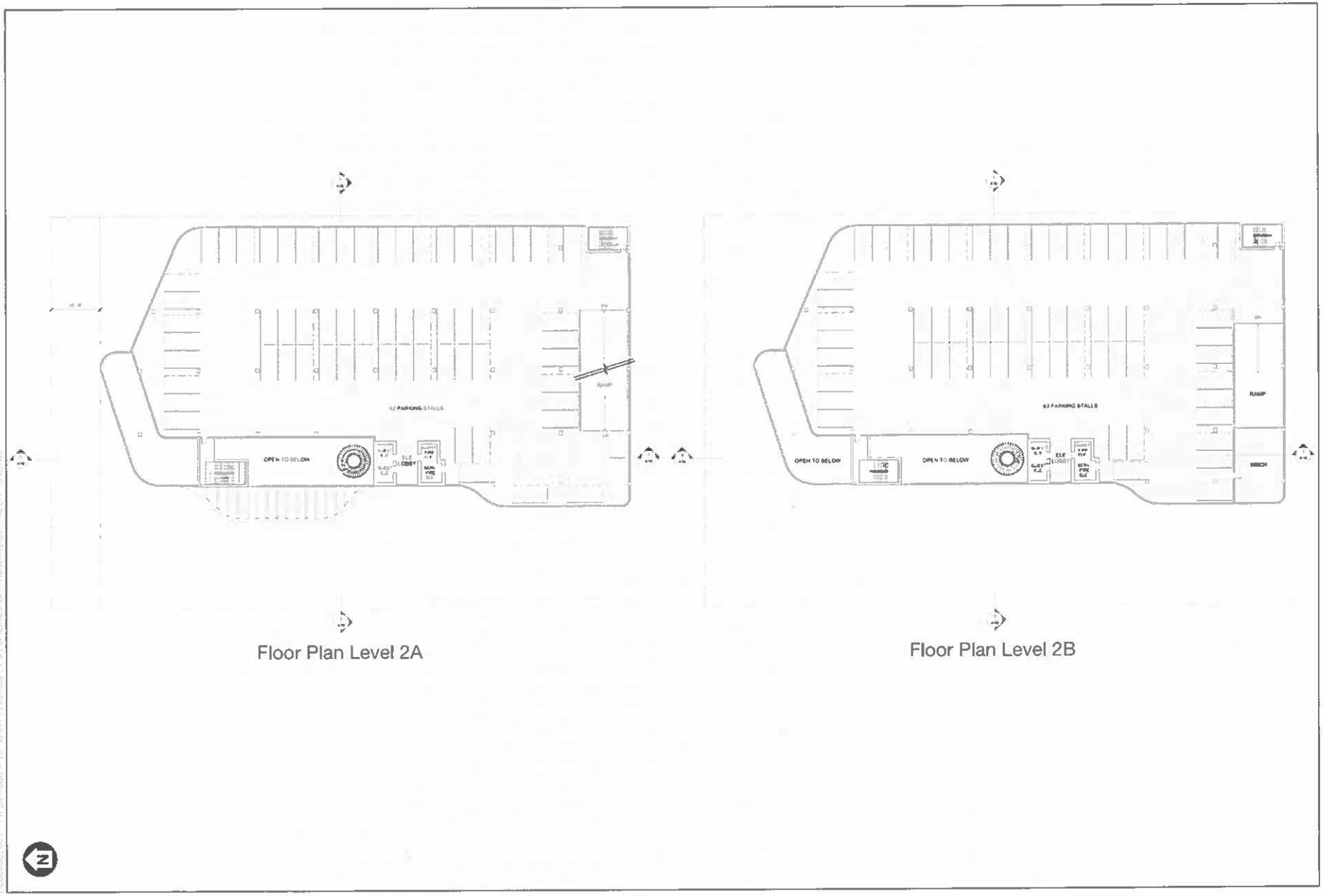


Floor Plan Level 2A

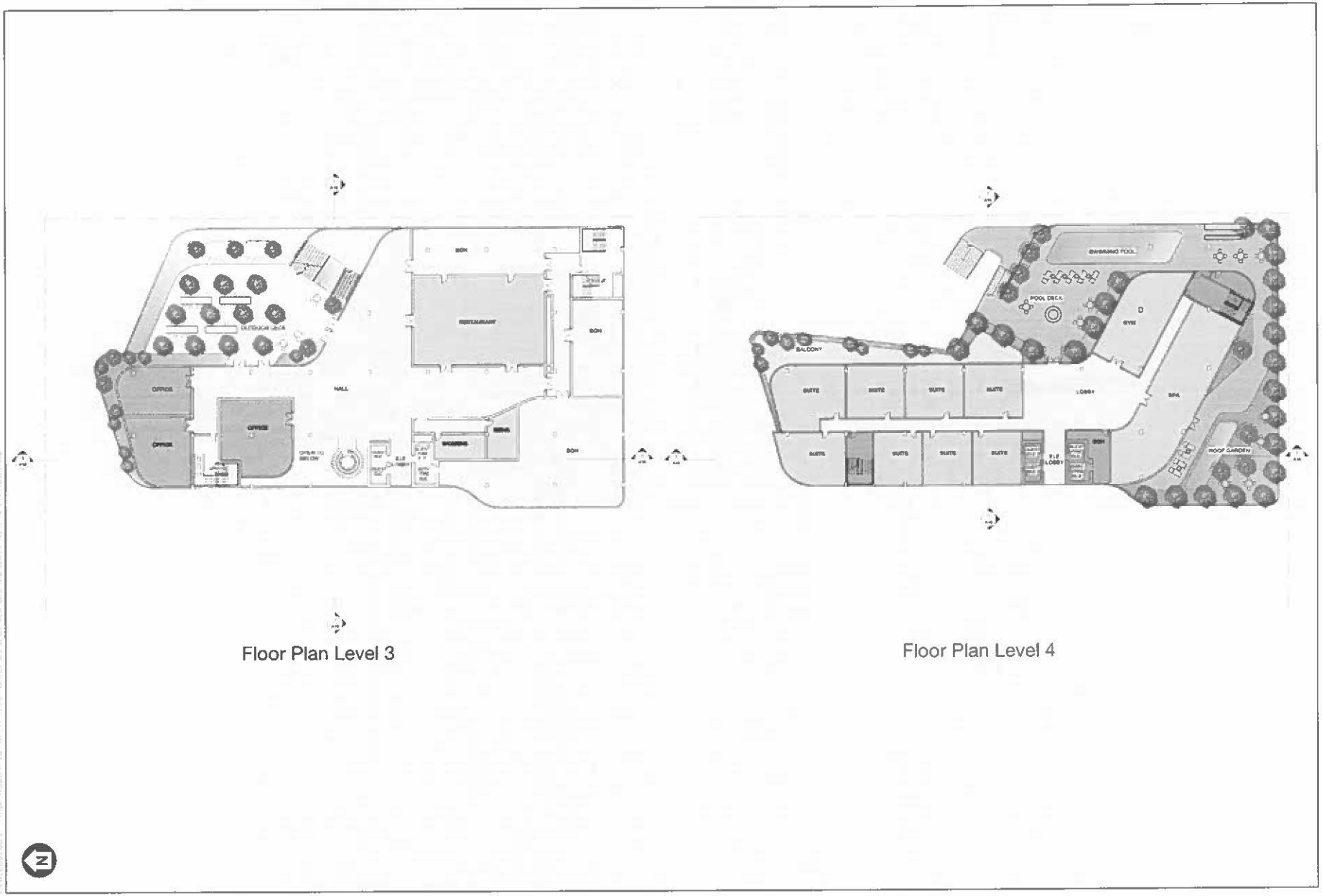
Floor Plan Level 2B

SOURCE: ARYA, 2021

Inglewood Arya Hotel Project

Figure 4
Floor Plan Levels 2A and 2B

ESA



Floor Plan Level 3

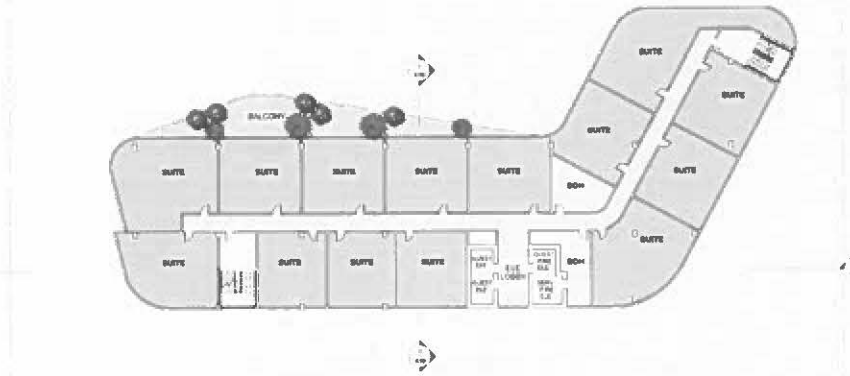
Floor Plan Level 4

SOURCE: ARYA, 2021

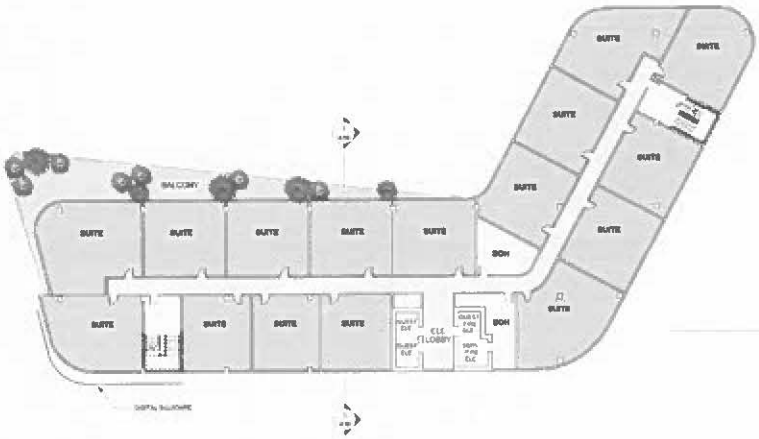
Inglewood Arya Hotel Project

Figure 5
Floor Plan Levels 3 and 4

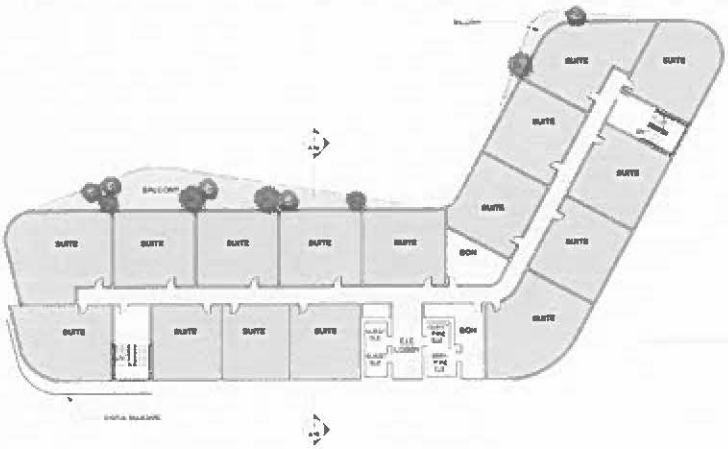
ESA



Floor Plan Level 5



Floor Plan Level 6, 8, 10, 12, 14



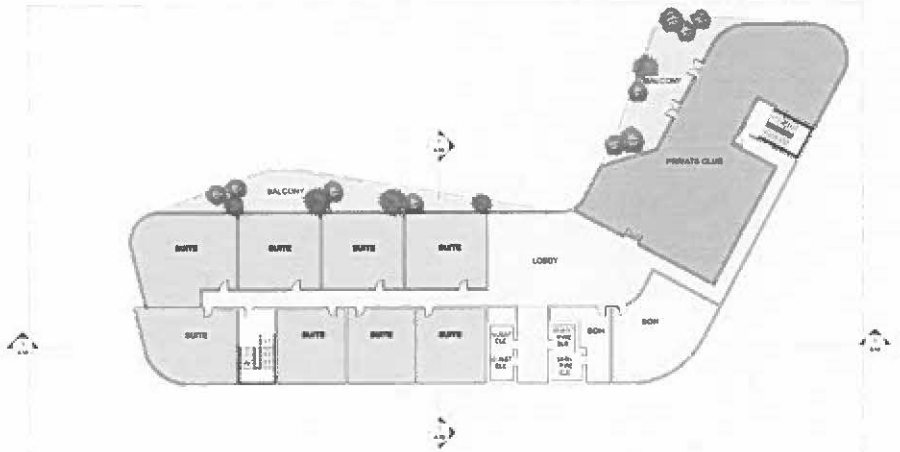
Floor Plan Level 7, 9, 11, 13

SOURCE: ARYA, 2021

Inglewood Arya Hotel Project

Figure 6
Floor Plan Levels 5 through 14

ESA



Floor Plan Level 15

Roof Deck

SOURCE: ARYA, 2021

Inglewood Arya Hotel Project

Figure 7
Floor Plan Level 15 and Roof Deck

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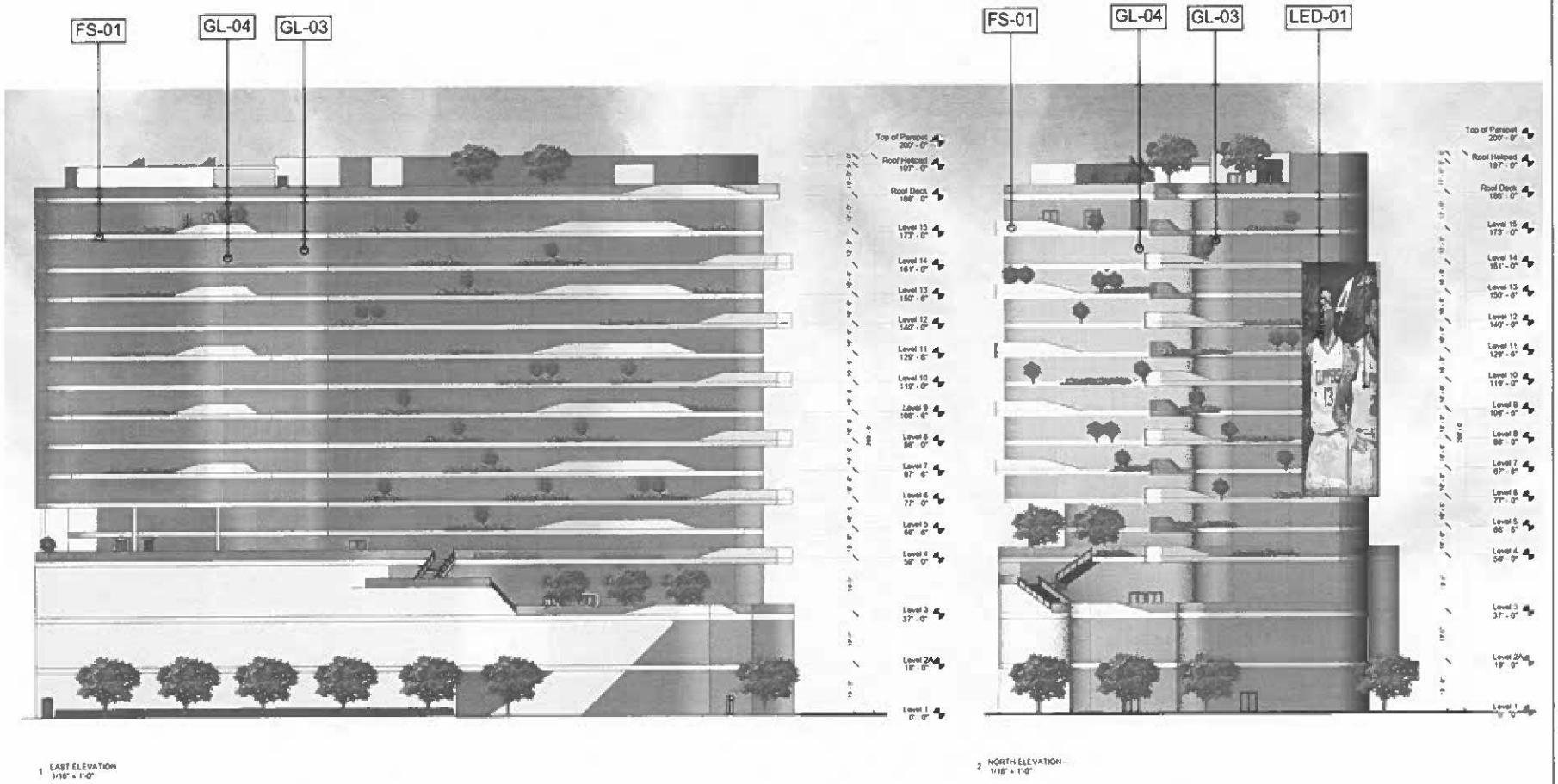

SOURCE: ARYA, 2021

Inglewood Arya Hotel Project

Figure 8
Eastern and Northern Building Elevations

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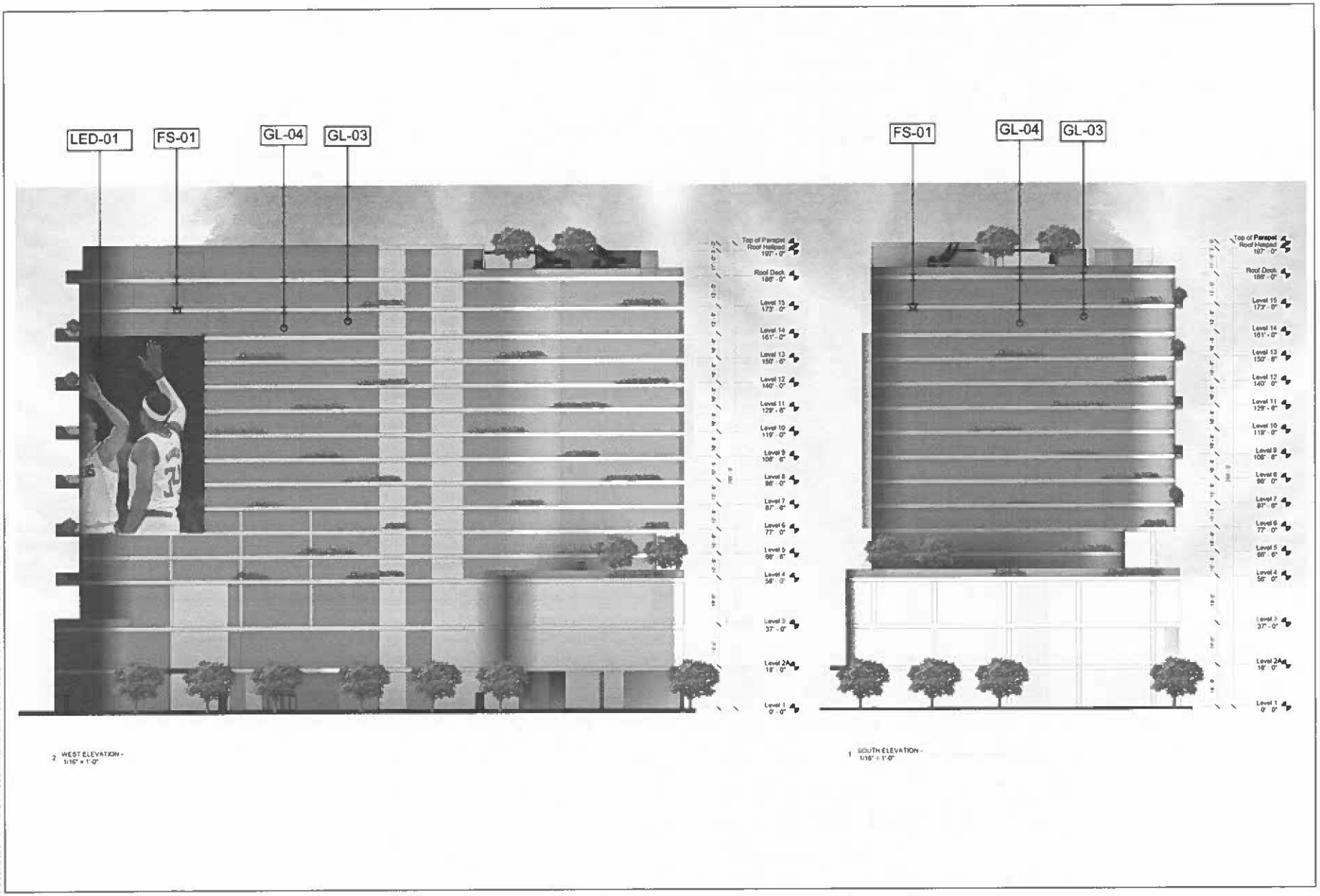

SOURCE: ARYA, 2021

Inglewood Arya Hotel Project

Figure 9
Western and Southern Building Elevations

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As depicted in Figure 3, the ground floor (level 1) of the hotel building would include the reception area and lobby, as well as a full-service hotel restaurant and bar lounge. In addition, back of house (BOH) operations, such as a fully enclosed trash/recycling room, mechanical room, and loading dock, as well as 17 staff parking spaces and two vehicle ramps (one ramp leading to vehicle parking on Levels 2A and 2B and one ramp leading to the subterranean parking level) would be located on level 1. Adjacent to the lobby, approximately 3,537 sf of dedicated restaurant space and approximately 1,310 sf of dedicated bar space would be provided. The restaurant would be accessed through the main entrance of the lobby and through the guest elevators located in the lobby area. The bar lounge would occupy a separate space across from the restaurant. The bar would provide a full line of alcohol service for on-site consumption during hours of operation. As shown in Figures 5 and 6, the 174 guest suites would be located on floors 4 through 15 with each suite having an average size of approximately 858 sf. The westernmost rooms on each guest floor would include access to an outdoor balcony space with landscaping.

As shown in Figure 5, level 3 would include 3,255 sf of employee office space, an approximately 3,000-sf restaurant, additional BOH operations, and a hall that would connect to an approximately 6,785-sf outdoor deck with landscaping and outdoor seating. Level 4 would include a pool deck, swimming pool, and roof garden totaling approximately 12,958 sf, as well as a 2,596-sf spa, and a 1,405-sf fitness center for use by hotel guests.

As depicted in Figure 7, a 4,000-sf private club/lounge and additional BOH operations would be located on Level 15. The private club would operate as an exclusive "members only" hotel lounge and would not be open to the general public. The private club/lounge would also include approximately 1,073 sf of balcony space. The rooftop of the hotel, as shown in Figure 7, would include a 19,405-sf multi-purpose room, kitchen, additional BOH operations, mechanical room, helipad, and an approximately 13,016 sf outdoor deck, which would have restricted access for hotel guest use only, and which would feature a full-service outdoor bar, landscaping, an outdoor water feature, and outdoor seating.

Access and Parking

Vehicular access to the Project Site would be provided via two north-facing driveways along West 102nd Street. The easternmost driveway would include a service road leading to a truck loading area, which would allow for unloading of deliveries to the hotel and for trash and recycling pickup, and a staff parking lot with 17 vehicle spaces. A pick-up and drop-off area would be accessed via the westernmost driveway as well as two vehicle ramps (one ramp leading to vehicle parking on Levels 2A and 2B (see Figure 4) and one ramp leading to the subterranean parking levels). Direct pedestrian access to the hotel would be through a walkway from the sidewalk along West 102nd Street.

Parking for the Project would be provided in one subterranean level below the hotel as well as Levels 1, 2A, and 2B of the hotel. A total of 269 vehicular parking spaces would be provided, which includes 127 subterranean parking spaces, 17 staff spaces on level 1, 62 spaces on level 2A, and 63 spaces on level 2B.

Sustainable Design Elements

Energy saving and sustainable design elements would be incorporated throughout the Project. The Project would incorporate green building design, which would promote conservation, energy efficiency, and carbon emission reduction. Energy saving and sustainable design elements include but are not limited to: installation of Electric Vehicle (EV) charging stations, low-flow plumbing water fixtures, tankless water heaters, low-emission windows, and Energy Star Appliances.

Well Relocation Site

The City receives its potable water from two sources: approximately 6,100 acre-feet per year (AFY) from the Metropolitan Water District of Southern California (MWD) and approximately 1,900 AFY from City-owned wells. The City owns 4,731 AFY of groundwater rights in the West Coast Basin. In recent years, groundwater production has decreased substantially due to the age of the wells and homeless vandalism. Currently, the combined production of Inglewood's two active wells is approximately 1,900 AFY, which constitutes only 40 percent of the City's groundwater production rights. Thus, the City has not been able to pump their full allocated groundwater rights.

The Project proposes to drill a new well (Well #8) at a City-owned property located at 3729 West 104th Street in order to provide a new source of high-quality groundwater. The proposed Well #8 is intended to replace the existing City Well #6, which is currently located on the Intuit Dome site, which is currently under construction. In addition, construction of the Well #8 would ensure that the City would have a more reliable supply of local groundwater and would help to offset the amount of imported water needed to meet City demand.

The proposed Well #8 is anticipated to be approximately 350 feet deep and would require 24-hour drilling activities during various phases of well construction. The proposed Well #8 would also include ancillary equipment necessary to support operation of the well and would be secured with perimeter fencing, lighting, and cameras. The proposed Well #8 is anticipated to produce approximately 1,900 AFY. Operation and maintenance would consist of routine inspections and monthly water quality testing in accordance with the requirements of the State Water Resources Control Board (SWRCB).

Construction Schedule/Activities

Project construction is anticipated to occur over approximately 27 months, beginning in April 2024, and ending in June 2026. Specifically, construction of the Hotel Site would include the following phases: demolition and grading; infrastructure improvements; foundation and concrete pouring; building construction; paving; and architectural coating. Construction of the Well Relocation Site would include the following phases: demolition; wastewater discharge installation; well drilling and installation of new casing; equip well and utilities; precision grading/paving and installation of fencing; and Southern California Edison (SCE) installation. It should be noted that various construction phases for the Hotel Site and the Well Relocation Site would overlap and occur concurrently, which has been accounted for in the technical analyses within this document and its attachments.

Construction of the Project would commence with the removal of the existing structure and paving on site, followed by site preparation and excavation. Approximately 944 cubic yards of demolition debris and site preparation debris (asphalt, earthwork, and general construction debris) would be hauled offsite. Excavation on the Hotel Site would be to a maximum depth of 24 feet, 6 inches, and to a maximum depth of 350 feet on the Well Relocation Site. The Project would export 53,610 cubic yards of soil during the grading phase and import 24 cubic yards of materials. Approximately 994 cubic yards of demolition debris and site preparation debris (asphalt, earthwork, and general construction debris) would be hauled offsite. Construction would occur Monday through Saturday between 7:00 A.M. and 4:00 P.M, in accordance with the allowable hours pursuant to Section 5-41 of the Inglewood Municipal Code (IMC).

Project Design Features

Air Quality

PDF-AIR-1: Construction Features: Construction equipment operating at the Project Site will be subject to a number of requirements. These requirements will be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. Construction measures would include, but are not limited to the following:

- The Project will require all off-road diesel construction equipment greater than 50 horsepower (hp) to meet the U.S. Environmental Protection Agency Tier 4 Final off-road emission standards. A copy of each unit's certified tier specification or model year specification and California Air Resources Board or South Coast Air Quality Management District operating permit (if applicable) will be available upon request at the time of mobilization of each applicable unit of equipment. This construction feature would allow for a reduction in diesel particulate matter and NO_X emissions during construction activities.
- The Project will require electrified air compressors, generators and tower cranes in place of diesel-fueled equipment. During the building construction phase of the hotel site, the Project will also require electrified plate compactors, forklifts and welders

PDF-AIR-2: Design Elements: In accordance with 2022 CALGreen Building Standards, the Project will incorporate the following mandatory energy and emission saving features:

- The Project will recycle and/or salvage at least 65 percent of non–hazardous construction and demolition debris.
- The Project will install 20 percent electric vehicle (EV)-capable, and 25 percent of EV capable spaces will include EV charging stations EV Charger Station, as required by the 2022 CALGreen Code.
- The Project will install water saving fixtures in all locations, including waterless urinals in public restrooms and water saving landscaping, consistent with the 2022 CALGreen Code.
- The Project would include energy saving and sustainable design elements include, but are not limited to: tankless water heaters, low-emission windows, and Energy Star Appliances
- The Project irrigation system would make use of captured rainwater contained within a cistern located in the subterranean levels of the parking structure to conserve potable water
- The Project will provide bicycle facilities such as lockers and bicycle parking for employees and visitors, including 14 short-term bicycle spaces

Noise

PDF-NOI-1: Project construction will not include the use of driven (impact) pile systems. Drilled piles or the use of a sonic vibratory pile driver are quieter alternatives that will be utilized where geological conditions permit their use. Noise shrouds will be used when necessary to reduce noise of pile drilling/driving.

PDF-NOI-2: A temporary and impermeable sound barrier will be erected at the following locations, prior to the start of earth moving activities. At plan check, building plans will include documentation prepared by a noise consultant verifying compliance with this design feature.

- Along the western, southern, and eastern portion of the Hotel Site boundaries between the construction area and the residential uses to the south, southwest, and east (represented by receptor

location M2 and M3). The temporary sound barrier will be designed to provide a minimum 10-dBA noise reduction at the ground level of receptor locations M2 and M3.

- Along the northern, western, southern, and eastern property line of the Well Relocation Site between the construction area and the residential uses in all directions (represented by receptor locations M2, M16, and M17). The temporary sound barrier will be designed to provide a minimum 10-dBA noise reduction at the ground level of receptor locations M2, M16, and M17.

PDF-NOI-3: Contractors will ensure that all on-site construction equipment, fixed or mobile, are equipped with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' standards. Prior to the issuance of demolition permits, certification of muffler installation will be submitted to the County for review. The construction contractor will keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications. The primary source of noise from construction equipment originates from the intake and exhaust portions of the engine cycle. According to FHWA, use of adequate mufflers systems can achieve reductions in noise levels of up to 10 dBA.[4] The contractor will use muffler systems that provide a minimum reduction of 10 dBA compared to the same equipment without an installed muffler system, reducing maximum construction noise levels. Contractors will include the muffler requirements in contract specifications. The contractor will also keep documentation on-site prepared by a noise consultant verifying compliance with this measure. Mufflers providing a noise reduction greater than 10 dBA would be technically infeasible or cost prohibitive given the current best available technologies. Further, mufflers are only effective on equipment with internal combustion engines and would not result in noise reductions for hand tools and other light-duty construction equipment. Therefore, PDF-NOI-3 incorporates muffling devices to the maximum extent feasible. If construction is implemented by an agency or entity other than the project Applicant, such as the California Department of Transportation, that has agency- or entity-specific mitigation practices, the agency's or entity's mitigation measure will be allowed as a substitute if it achieves a noise reduction performance standard that is at least as protective as described herein (i.e., a minimum noise reduction of 10 dBA as compared to the project without the noise reduction measure).

Project Design Feature PDF-NOI-4: Pursuant to Inglewood Municipal Code Section 5-41, the project will obtain all relevant permits from the Permits and Licenses Committee before nighttime construction is allowed to proceed.

Project Design Feature PDF-NOI-5: Contractor(s) will prohibit haul trucks from traveling on Doty Avenue between 102nd Street and 104th Street. Haul trucks will be directed to travel to/from the Hotel Site by heading east on 102nd Street turning left on Yukon Avenue and turning left on Century Boulevard or heading east on 102nd Street turning left on Doty Avenue and turning left on Century Boulevard to reach the I-405 Freeway. Haul trucks will be directed to travel to/from the Well Site by heading east on 104th Street turning left on Yukon Avenue and turning left on Century Boulevard or heading west on 104th Street turning right on Prairie Avenue and turning left on Century Boulevard to reach the I-405 Freeway. The haul truck routes will be specified in the contractors' documentation.

Project Design Feature PDF-NOI-6: Outdoor amplified sound systems, if any, will be limited to a sound level equivalent to 75 dBA ($L_{eq\text{-}1hr}$) measured at a distance of 15 feet from the amplified speaker sound system. A qualified noise consultant shall provide written documentation that the design of the system complies with the maximum noise level. Compliance will be ensured through pre-performance noise tests/measurements for performances or

4 FHWA, *Special Report – Measurement, Prediction, and Mitigation*, Chapter 4 Mitigation, https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm. Accessed July 16, 2021.

ambient music speakers with potential to exceed the sound level, along with any necessary adjustments to the location and nature of proposed performances or ambient music speakers. Speakers will be downward or inward facing and shielded from off-site sensitive uses. The Applicant or Operator will prepare standard operating procedures for the use of amplified speakers at this location consistent with this requirement. The standard operating procedures will be provided to the City and the Inglewood Police Department (IPD) prior to the issuance of a special event permit for the Project and posted on-site in the event of IPD response to noise complaints.

Project Design Feature PDF-NOI-7: The operation of construction equipment that generates high levels of vibration, such as large bulldozers, loaded trucks, jackhammers, and small bulldozers will be prohibited within 80 feet, 72 feet, 43 feet, and 9 feet, respectively, of residential receptors surrounding the Well Relocation Site between the hours of 8:00 p.m. and 7:00 a.m. The contractor(s) will require and document compliance with the minimum allowable setbacks in a construction vibration management plan, which will be provided to the City prior to issuance of a demolition permit. The construction vibration management plan will detail the specific types of equipment to be used during demolition, grading, and building construction, estimated vibration velocities, and distance to vibration receptors. Equipment and or alternative construction techniques to be used within the required setbacks for large bulldozers, loaded trucks, jackhammers, and small bulldozers will be identified to ensure that vibration velocities will not exceed thresholds for potential structural damage.

Project Design Feature PDF-NOI-8: The Project would include appropriate locations for interior private areas and implement noise reduction measures, such as double pane windows and insulation features to meet the City's interior noise standards of 45 dBA CNEL.

Necessary Approvals

Discretionary entitlements, reviews, and approvals required for implementation of the Project would include, but not necessarily be limited to, the following:

- Site Plan Review for a development that exceeds a gross floor area of 25,000 square feet pursuant to IMC Section 12-39.50;
- Planning Commission Design Review to allow new development in an existing Limited Manufacturing (M-1L) Zone pursuant to IMC Section 12-32.14; and
- Special Use Permit for development with helipad pursuant to IMC Section 12-95.1(A)(1).

Assessment of Class 32 In-Fill Development Project Exemption

Exemption Criteria

Article 19 of the California Environmental Quality Act (CEQA Guidelines Sections 15300 to 15333), includes a list of classes of projects that have been determined to not have a significant effect on the environment and as a result, are exempt from review under CEQA.

This document demonstrates that the Project, which includes the demolition of the existing building on the Project Site as well as the construction of a new building, qualifies for an exemption under CEQA Guidelines Section 15332, In-Fill Development Projects, as a Class 32 project that meets the following conditions:

a. The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

b. The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

c. The project site has no value as habitat for endangered, rare or threatened species.

d. Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

e. The site can be adequately served by all required utilities and public services.

The analysis below describes the Project's consistency with the applicable Class 32 exemption criteria.

Criterion (a): The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

The Project Site is designated Industrial and is zoned M-1L, Limited Manufacturing, based on the City's General Plan Land Use and Zoning Maps. The goal of the City's Industrial land use designation is to include uses that have transportation facilities and utilities adequate for the industry's needs, are compatible with surrounding land uses, and attract industries which are labor intensive so as to provide employment for the City's residents.[5] The M-1L Zone permits several uses including hotels, professional and medical offices, cabinet shops and furniture manufacture, storage and warehousing, and utilities and public services. The development standards of the M-1L Zone are intended to establish low intensity industrial, professional office and limited commercial uses in areas not suitable for residential uses due to environmental factors; to ensure the maintenance of high design standards and to encourage and provide for the redevelopment of land. The Project's proposed use is consistent with the General Plan and zoning designations for the Project Site. Additionally, as indicated above, the Project Site is located within the Inglewood International Business Park Specific Plan area as well as within the LAX Airport Influence Area of the Los Angeles County ALUP.

The City's General Plan Land Use Element, Inglewood International Business Park Specific Plan, and Los Angeles County ALUP contain several goals, objectives, standards, and policies that are relevant to the Project. **Table 2, Comparison of the Project to Applicable Goals of the General Plan Land Use Element**, **Table 3, Comparison of the Project to Applicable Goals, Objectives, and Standards of the International Business Park Specific Plan**, and **Table 4, Comparison of the Project to Applicable Policies of the Los Angeles County Airport Land Use Plan**, present an evaluation of the Project's consistency with applicable plan goals, objectives, standards, and policies.

As discussed below in **Table 2**, **Table 3**, and **Table 4**, the Project would be consistent with applicable plan goals, objectives, standards, and policies. Furthermore, as discussed above, the Project would be consistent with the City's General Plan designation of Industrial, which allows for uses that have transportation facilities and utilities adequate for the industry's needs, are compatible with surrounding land uses, and attract industries which are labor intensive so as to provide employment for the City's residents as well as the City's zoning code designation of M-1L, which allows for a variety of uses, including hotels and utilities. Therefore, the Project would meet this criterion.

5 City of Inglewood. 2016. Land Use Element. https://www.cityofinglewood.org/209/Inglewood-General-Plan. Accessed August 2022.

TABLE 2
COMPARISON OF THE PROJECT TO APPLICABLE GOALS OF THE GENERAL PLAN LAND USE ELEMENT

Goal	Analysis of Project Consistency
General	
Goal: Help promote sound economic development and increase employment opportunities for the City's residents by responding to changing economic conditions.	**Consistent.** The Project includes the construction of a 454,183 sf luxury hotel development, which would create additional employment opportunities in the city.
Goal: Promote Inglewood's image and identify as an independent community within the Los Angeles Metropolitan area.	**Consistent.** The Project includes the construction of a luxury hotel development intended for Inglewood visitors coming to Inglewood's adjacent sports and entertainment destinations, including SoFi Stadium, The Forum, and the future Intuit Dome. In addition, construction of the proposed Well #8 would provide the City the ability to increase its groundwater production within its current groundwater rights, which would help the City to support its water demand and would reduce dependence on imported water supplies.
Industrial	
Goal: Continue the redevelopment of Inglewood by promoting the expansion of existing industrial firms and actively seek the addition of new firms that are environmentally nonpolluting.	**Consistent.** The Project would involve the redevelopment of the Project Site, which currently includes a light industrial building and undeveloped land. As discussed below, the Project would not generate significant amounts of air pollutants.
Goal: Increase the industrial employment opportunities for the City's residents.	**Consistent.** The Project includes the construction of a 454,183 sf luxury hotel development, which would create additional employment opportunities in the city.
Circulation	
Goal: Insure that proposed new uses can be accommodated by adequate and safe streets.	**Consistent.** As discussed below, the Project would not result in significant impacts to the existing circulation system and roads within the Project area. Therefore, the Project would be adequately accommodated by the existing circulation system and roads.

SOURCE: City of Inglewood, 2016.

Inglewood International Business Park Specific Plan

The Inglewood International Business Park Specific Plan was adopted on December 21, 1993. **Table 3, Comparison of the Project to Applicable Goals, Objectives, and Standards of the International Business Park Specific Plan**, provides a consistency analysis of the Project with applicable goals, objectives, and standards of the Specific Plan.

TABLE 3
COMPARISON OF THE PROJECT TO APPLICABLE GOALS, OBJECTIVES, AND STANDARDS OF THE INTERNATIONAL BUSINESS PARK SPECIFIC PLAN

Plan Goals, Objectives, and Standards	Analysis of Project Consistency
Goal 1: Create an economically viable and diverse business park that generates employment opportunities for residents and revenue for the City of Inglewood.	**Consistent.** The Project includes the construction of a 454,183 sf luxury hotel development, which would create additional employment opportunities in the city. Additionally, the hotel is intended for Inglewood visitors coming to Inglewood's adjacent sports and entertainment destinations, including SoFi Stadium, The Forum, and the future Intuit Dome.
Goal 3: Create a visually attractive business park using streetscape, landscape, and urban design features to unify the	**Consistent.** The hotel would include a modern design with large green tinted glass windows and a transparent LED media screen on the exterior as well as various landscape elements throughout the hotel and Project

Plan Goals, Objectives, and Standards	Analysis of Project Consistency
individual business structures into a cohesive "campus" like commercial-industrial center.	Site. The design of the Project would be complimentary in style to the adjacent Intuit Done project.
Objective 1: Recycle and improve the physical character of the IIBP area to attract large scale corporate users.	**Consistent.** The Project would improve the physical character of the IIBP area by constructing a luxury hotel development to encourage corporate visitors to the area. In addition, construction of the proposed Well #8 would increase the City's available groundwater supplies to support additional development within the IIBP and City.
Objective 3: Accommodate new development in new structures which comply and enhance the urban design characteristics as provided in the Specific Plan.	**Consistent.** The hotel would include a modern design with large green tinted glass windows and a transparent LED media screen on the exterior as well as various landscape elements throughout the hotel and Project Site. The design of the Project would be complimentary in style to the adjacent Intuit Dome project.
Land Use	
LU3: The remaining IIBP area shall be designated as Limited Manufacturing (M-1L). A) Permitted Uses in the M-1L Limited Manufacturing Zone are: • Any kind of assembly, manufacture or processing of products other than those which may be obnoxious or offensive by reason of emission of noise, odor, dust, smoke, vibration, or similar causes; • Cabinet shops and furniture manufacture; • Food packaging and bottling plants; • Book publishing, printing, and binding; • Freight terminals and parcel delivery terminals; • Laboratories, research, testing and medical; • Storage and warehousing;, • Manufactures' sales, retail and wholesale, of manufacturers' products exclusively; • Retail sales of new merchandise only: a. if conducted within a single tenant structure having a minimum gross floor area of 75,000 square feet; or b. if conducted within a shopping center (multiple tenant structure or structures) having a minimum total gross floor area of 100,000 square feet, subject to Planned Assembly Development approval pursuant to Article 18 of Chapter 12 of the Inglewood Municipal Code and consisting of only those commercial uses and services permitted in the C-2 Zone. • Professional and medical offices; • Financial institutions; • Hotels (inclusive of restaurants and shops intended to primarily serve hotel patrons, with a minimum of 100 guestrooms per facility); • Employee food facilities and service stores when developed adjunct to and integrated within other permitted uses; • Utility and public service uses; and • Daycare for employees' children as an ancillary use.	**Consistent.** The Project is zoned M-1L, Limited Manufacturing. The M-1L Zone permits several uses including hotels, professional and medical offices, cabinet shops and furniture manufacture, storage and warehousing, and utility and public services. The development standards of the M-1L Zone are intended to establish low intensity industrial, professional office and limited commercial uses in areas not suitable for residential uses due to environmental factors; to ensure the maintenance of high design standards and to encourage and provide for the redevelopment of land. The Project's proposed use is consistent with the General Plan and zoning designations for the Project Site.
Urban Design	
UD1: Setbacks are to be maintained along all street frontages of the IIBP Specific Plan area. A building setback is the area from the property line to the edge of structure in which no buildings may exist or otherwise be constructed. A parking setback is the area	**Consistent.** Consistent with UD1, the Hotel building would be setback 25 feet from the frontage along 102nd Street, north of the Project Site. Surface parking would be provided within the southern portion of the Site, which is

Plan Goals, Objectives, and Standards	Analysis of Project Consistency
from the property line to the edge of a parking surface in which no surface designed for the parking or stowing of vehicles or materials is permitted as shown in Figures 8 and 9. IIBP setbacks are: • Prairie Avenue: Building setback 25 feet Parking setback 10 feet • 104th Street: Building setback 25 feet Parking setback 15 feet • 102nd Street: Building setback 15 feet Parking setback 10 feet • Yukon Avenue: Building setback 15 feet Parking setback 10 feet • Cul-de-sacs: Building setback 15 feet Parking setback 10 feet	not adjacent to a street frontage, and therefore, the Project design would not conflict with the parking setback requirements in UD1.
UD2: The use of "defensible space" concepts in building and site design shall be encouraged to promote individual safety of site users. An area designed with the defensible space concept is an area which can be readily safeguarded against the occurrence of illicit activities. Parking lots, access ways, plazas and other public places must provide a comfortable ambience for the protection of public safety and security. Spaces are defendable when they are well lit, and when activities are viewed from both public and private vantage points. Through the orientation of buildings, streets, and access points, in addition to the provision of ample lighting, developments can be designed to deter the public from avoidable threats.	**Consistent.** The Project would be designed to include adequate interior and exterior lighting for security purposes, and the main entrance to the hotel would be facing west and would not be along the Project Site's frontage. Additionally, the Project would include a 24-hour/seven-day video surveillance security program to ensure the safety of Project employees and visitors. The cameras would be located to capture views at the perimeter of the building, at main pedestrian and vehicular entries and at stair/elevator lobbies.
UD5: Driveways shall be located no closer than 125 feet to another driveway or a street intersection. Exceptions are subject to review and approval from the City's Traffic Engineer and the Department of Community Development and Housing.	**Consistent.** The two proposed driveways along West 102nd Street would be located more than 125 feet apart.
UD10: Buildings are required to be modulated both vertically and horizontally through the use of step-backs and changes in plane on elevations where visible from the public; the facade of the building shall not be a continuous linear plane as shown in Figure 12. To accomplish this a maximum of 65 percent of a building's facade shall be located on the setback dimension, the remaining 35 percent of the building's facade shall be setback at least 10 feet from the original facade line as shown in Figure 13.	**Consistent.** The hotel building would not be a continuous linear plane as the façade would include a setback beginning on Level 4. The building would also include balconies and landscaping throughout Levels 3 through 15 which would add dimension and minimize flat facades.
UD11: AU buildings are to be attractively designed from all directions. Where the rear or sides of a building are visible from adjacent streets and alleys or from a nearby residential area, they shall receive equal design treatment as the front facade.	**Consistent.** The hotel would include a modern design with large green tinted glass windows, landscaping elements, balconies, and staircases included on all four sides.
UD16: Building design is encouraged to incorporate elements which minimize flat facades, such as recessed windows or alternating patterns of solid (walls) to void (windows) that will produce a "punched" window effect.	**Consistent.** See UD10, above.
UD 17: The use of reflective glass or reflective metallic facades and other building material and colors which conflict with the overall context of development in the IIBP is limited, and subject to site plan review approval.	**Consistent.** Project building materials would include high performance low-emission guardian glass, wood composite, rammed earth fiber reinforced cement, and clear anodized aluminum. The hotel color would follow a pattern of earth tones and light greys. Proposed building materials and colors would not conflict with other development in the IIBP including the Intuit Dome project. Additionally, pursuant to IMC Section 12-39.50, the Project would be subject to site plan review.

Plan Goals, Objectives, and Standards	Analysis of Project Consistency
UD18: Building materials and color should follow a pattern of earth tones and light greys. The predominant materials are masonry (brick and stone), stucco, and tile, or a combination thereof.	**Consistent.** Proposed building materials and color would follow a pattern of earth tones and light greys.
UD25: Wall, window, directory, and all other building signs shall be integrated with the building's architectural design, style and character.	**Consistent.** All hotel signs would be integrated with the hotel's architectural design, style, and character.
UD26: All developments are to incorporate sign(s) location and sign(s) design as part of development plans subject to plan review.	**Consistent.** The location and design of proposed hotel sign(s) would be incorporated into the development plans prior to plan review.
UD48: Property setback areas exclusive of walkways, driveways, and paved plazas are to be fully landscaped with a palette of vegetation that should include a combination of lawn, ground cover, water efficient plant materials, and trees and shrubs in a hydrozone scheme.	**Consistent.** All property setbacks would be landscaped with a combination of vegetation including, lawn, ground cover, and trees and shrubs.
UD49: Trees located along all street frontages and scattered throughout the site to provide shade, visual unity, and color. Selected tree species shall be drought-and smog-tolerant, fire resistant, and pest resistant. Preserve and protect existing trees and shrubs, to the extent possible.	**Consistent.** The Project would include trees along the street frontage and throughout all hotel levels. These tree species would have medium to low water needs.
UD50: New street trees shall be a minimum of 36" box size (and be planted in a linear fashion spaced 25 feet on center), where site conditions do not permit a 36" box size tree, the new street tree shall not be smaller than 24" box size.	**Consistent.** The Project would include trees along the street frontage and throughout all hotel levels. All trees would be either 24" or 36" box size.
UD63: All new development or adaptive reuse projects are required to underground new and existing utilities and provide risers at the property line for hookup to existing above-ground utility infrastructure.	**Consistent.** All new and existing Project utilities would be undergrounded, including the proposed new City water well, Well #8.
Circulation, Site Access, and Parking	
C16: All public and private developments must provide sufficient on-site parking to meet their generated demand.	**Consistent.** The Project would provide a total of 269 on-site vehicle parking spaces, which would exceed the 257 parking spaces required by the IMC.
C17: All public and private developments must comply with city parking requirements.	**Consistent.** The Project would provide a total of 269 on-site vehicle parking spaces, which would exceed the 257 parking spaces required by the IMC.
Public Works and Services	
PW7: All developments within the IIBP shall utilize sound construction techniques and state-of-the-art water saving fixtures, seismic, and thermal design standards; all structures are to be constructed in accordance with City's building and other pertinent codes and regulations.	**Consistent.** Construction of the Project would comply with South Coast Air Quality Management District Rule 403 for fugitive dust and Rule 1113 for architectural coatings. The Project would include installation of low-flow plumbing water fixtures. Project construction would be compliant with City codes and regulations as well as the 2019 California Building Code.
PW8: All structures are to be designed and constructed with secondary building exits to allow for the safe and timely evacuation of occupants in the event primary exits become blocked or impaired during a disaster.	**Consistent.** The Project would include two sets of staircase exits (one on the northeastern side and one on the southwestern side) on each hotel level.
Environment	
Any environmental studies/reports completed within the IIBP area shall include a noise impact evaluation as well as any proposed mitigation measures needed to alleviate unacceptable noise levels experienced or to be experienced. The noise impact evaluation shall at a minimum include the following:	**Consistent.** The Noise and Vibration Impact Study (Attachment B) prepared for the Project illustrates the area's existing and projected ambient noise levels as well as their sources, calculates the projected reductions to interior noise levels, and evaluates impacts on adjacent land uses.

Plan Goals, Objectives, and Standards	Analysis of Project Consistency
A) illustrate the area's existing and projected ambient noise levels as well as their sources; B) calculate the projected reductions to interior noise levels; C) evaluate impacts on adjacent land uses; and D) illustrate the proposed sound attenuation features, if any, to be incorporated into the project's design which are needed to meet the required interior noise level reductions.	
E2: Development generating ambient noise levels that exceed 65 dB(A) at the site's property line is to incorporate special sound attenuation features into project design to reduce interior noise levels. Complete conformance with the measures required by the Uniform Building Code, FAA guidelines, and the State Noise Insulation Standards (California Administrative Code, Title 24) shall be required.	**Consistent.** As shown in the Noise and Vibration Impact Study (Attachment B) prepared for the Project, incorporation of Project Design Features PDF-NOI-1 through PDF-NOI-8 would ensure that operational noise levels would not exceed applicable significance thresholds and no operational noise impacts would occur.
E3: Buildings are to be designed and oriented as to minimize potential for noise impacts on surrounding residential uses.	**Consistent.** As shown in the Noise and Vibration Impact Study (Attachment B) prepared for the Project, the Project would be designed and oriented to minimize noise impacts on surrounding residential uses. Furthermore, no construction or operational noise impacts would occur with implementation of the Project.
E5: All developments are to provide exterior lighting that is adequate, ensures a safe environment without the nuisance of light or glare impacting adjacent properties and is in accordance with standards outlined in the Urban Design section.	**Consistent.** The Project would be designed to include adequate exterior lighting for security purposes.

SOURCE: City of Inglewood, 1993.

Los Angeles County Airport Land Use Plan

The Los Angeles County ALUP was adopted on December 19, 1991, and was revised December 1, 2004.[6] **Table 4, Comparison of the Project to Applicable Policies of the Los Angeles County Airport Land Use Plan,** provides a consistency analysis of the Project with applicable policies of the Plan.

TABLE 4
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE LOS ANGELES COUNTY AIRPORT LAND USE PLAN

Policy	Analysis of Project Consistency
Policy G-1: Require new uses to adhere to the Land Use Compatibility Chart.	**Consistent.** According to the Land Use Compatibility Chart, up to 70 CNEL is considered satisfactory for Industrial land uses. As discussed below, the Project would result in 65 CNEL with incorporation of Project Design Feature PDF-NOI-8, which requires noise-sensitive development within the 65 dB CNEL of LAX to be designed to provide noise insulation so as to meet City noise standards.
Policy G-4: Prohibit uses which will negatively affect safe air navigation.	**Consistent.** The Project includes the construction of a 15-story luxury hotel development up to 200 feet in height. The height of the hotel would not exceed the maximum allowed height of 200 feet in the M-1L Zone. Therefore, the Project would not negatively affect safe air navigation.
Policy N-3: Utilize the Table Listing Land Use Compatibility for Airport Noise Environments in evaluating projects within the planning boundaries.	**Consistent.** See Policy G-1, above.

6 Los Angeles County Airport Land Use Commission, 2004. Los Angeles County Airport Land Use Commission Comprehensive Land Use Plan. Revised December 1, 2004. https://planning.lacounty.gov/aluc/airports. Accessed August 2022.

Policy	Analysis of Project Consistency
Policy S-7: Comply with the height restriction standards and procedures set forth in FAR Part 77.	**Consistent.** See Policy G-4, above.

SOURCE: Los Angeles County Airport Land Use Commission, 2004

Criterion (b): The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

The Project Site is located within the limits of the City of Inglewood and is approximately 2.0-acres within a developed urban neighborhood. The Project Site is located in the vicinity of the City's developing sports and entertainment district. Although the Project area will be undergoing transformation, the Project Site is currently surrounded by a mix of low to medium-density residential, commercial, and industrial uses. Surrounding land uses are as follows:

- North – West 102nd Street is directly adjacent to the Project Site, with undeveloped land and industrial uses beyond.
- South – Undeveloped land is directly adjacent to the Project Site, with single-family residences beyond.
- East – Single- and multi-family residences are directly adjacent to the Project Site, with South Doty Avenue beyond.
- West – The Inuit Dome construction site is directly adjacent to the Project Site.

In addition, the Project Site is south of the future hotel and parking site proposed under the Intuit Dome project. The Intuit Dome will consist of an 18,000-seat sports and entertainment arena that will serve as the home court for the National Basketball Association Los Angeles Clippers, as well as provide a venue for a multitude of events, including concert, family and other traveling shows, civic events, and major conferences and conventions.

The Project Site is located south of the HPSP area, which includes SoFi Stadium, the home of the Los Angeles Rams and Los Angeles Chargers teams. The HPSP provides for the development of retail, office, and residential uses. In addition, there are religious and educational facilities in the Project vicinity, including Morningside High School and Monroe Middle School, which are located approximately 0.3 and 0.6 miles southeast, respectively, of the Project Site, an early childhood education center (Crystal Stairs, Inc.), located approximately 530 feet southwest of the Project Site, and the Inglewood Southside Christian Church, located approximately 620 feet southwest of the Project Site. The Forum, an approximately 18,000-seat entertainment venue, is also located approximately one mile north of the Project Site, near the intersection of South Prairie Avenue and Manchester Boulevard. Therefore, the Project would meet this criterion.

Criterion (c): The project site has no value as habitat for endangered, rare or threatened species.

As discussed above, the Project Site is located within a highly developed area, where the Hotel Site is currently developed and paved with one light manufacturing building and the Well Relocation Site is an undeveloped parcel. Although the Well Relocation Site is undeveloped land, the undeveloped area does not provide habitat for sensitive species due to its small size, lack of native vegetation, and highly urban context. In addition, there are existing

ornamental trees on site, which do not provide valuable habitat for sensitive species. Therefore, the Project would meet this criterion.

Criterion (d): Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

Traffic

The following analysis of potential traffic impacts is based on the Transportation Impact Analysis (TIA) prepared for the Arya Hotel Project in December 2023 by Fehr and Peers, which is provided in Attachment A of this memorandum. The TIA includes an analysis of vehicle miles travelled (VMT) that evaluates the potential transportation impacts associated with development of the Hotel Site. Since construction of the proposed Well #8 on the Well Relocation Site would primarily consist of construction activities with minimal operation and maintenance activities, this component of the Project was not included in the Project's VMT assessment as construction trips would cease once construction is complete. The findings of the TIA that apply to the transportation related questions included in Appendix G of the CEQA Guidelines, are summarized below.

- **Conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycles, and pedestrian facilities?**

As discussed in the TIA, a review was conducted to determine whether the Project conflicts with a transportation-related City plan, program, ordinance, or policy that was adopted to protect the environment. A project is considered consistent with an applicable plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. Any inconsistency with an applicable policy, plan, or regulation is only significant if the policy, plan, or regulation was adopted for the purpose of avoiding or mitigating an environmental effect and if the inconsistency itself would result in a direct physical impact on the environment. The evaluation was conducted in alignment with the City of Inglewood Transportation Impact Analysis Guidelines, and included a review of the following documents:

- City of Inglewood General Plan Circulation Element (1992)
- City of Inglewood General Plan Land Use Element (2020)
- Envision Inglewood – 2019 City of Inglewood Mobility Plan (2019)
- City of Inglewood General Design Guidelines (1979)
- New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines (2016)
- Hollywood Park Specific Plan (2015)
- Imagine Inglewood Active Transportation Plan (2022)
- City of Inglewood Municipal Code: Chapters 3 and 12
- ConnectSoCal 2020-2045 SCAG RTP (2020)
- Metro 2020 Long Range Transportation Plan (2020)
- Metro Short Range Transportation Plan (2014)
- Inglewood First/Last Mile (2019)
- City of Los Angeles Crenshaw Boulevard Streetscape Plan (2015)
- City of Inglewood Energy and Climate Action Plan (2013)
- Westchester/Veterans Station Area Transit Oriented Development Plan and Design Guidelines (2021)
- Crenshaw/Imperial Transit Oriented Development Plan and Design Guidelines (2021)

As demonstrated in Table 1 in the TIA, the Project features, location, and design generally support multimodal transportation and would be consistent with City plans, policies, ordinances, and programs put in place to protect the environment and no significant effects would occur as a result of Project implementation. Therefore, the Project meets this criterion.

- **Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?**

As discussed in the TIA, per the City TIA Guidelines, the appropriate tool for analyzing VMT generated by the Project is the City of Inglewood VMT Calculator Tool, which allows users to locate projects using APNs and estimate their VMT efficiency metrics. Since construction of the proposed Well #8 on the Well Relocation Site would primarily consist of construction activities with minimal operation and maintenance activities, this component of the Project was not included in the Project's VMT analysis. The City TIA Guidelines requires that employee VMT for hotel projects should be analyzed separately from guest/visitor trips. Subtracting the vehicle trips generated by the employees of the existing light industrial facility on the Project Site, the Project's employees would result in a net increase of 66 daily non-retail trips. Since this is below the threshold for further VMT analysis of 250 daily trips, no further analysis is required, and no significant effects would result from Project employees during Project operations (Attachment A).

For guest/visitor trips, the City TIA Guidelines determined that significant effects would occur if the guest/visitor VMT would represent a net increase in daily VMT. For a hotel to result in new VMT, it would need to generate additional demand for hotel rooms such that new visitors would be attracted to the destination. The Project includes standard hotel amenities such as a hotel bar, hotel lounge and lobby areas, hotel restaurant, hotel spa and fitness center, and a pool area. Therefore, the Project does not contain unique features that by themselves would attract new visitors. Furthermore, the Project does not affect the local or regional population, disposable income for travel, or the attractiveness of local destinations. The Project's main effect is to increase hotel room supply creating more room choices for visitors and thus, no significant effect would result from Project implementation (Attachment A).

The Project would generate new employment and demand for vendor services that would generate new vehicle trips and VMT. However, these trips and VMT are expected to be offset by the much larger number of visitors using the Project Site, especially over the course of a full year. Therefore, the net effect of the Project on VMT would be negligible or possibly negative. Given the land use (hotel) and the location (conveniently located near sports and entertainment venues in Inglewood and the airport), the majority of trips to the Hotel Site would be shifted trips rather than new trips and the trip lengths would likely be similar, if not shorter, than existing trips to other hotels. Therefore, based on the reasons discussed above, the Project would have a less-than-significant impact on VMT..

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

As discussed in the TIA, the Project would remove the existing driveway on the Hotel Site and construct two new driveways. The western driveway would service hotel guests and visitors, and the eastern driveway would service hotel employees and delivery vehicles. While implementation of the Project would result in the installation of new landscaping features along West 102nd Street, existing sight lines would be preserved or improved, providing vehicles entering and exiting either driveway with adequate visibility of oncoming traffic. Additionally, as a result of the construction of the Intuit Dome project immediately west of the Hotel Site, West 102nd Street no longer provides access to Prairie Avenue, reducing the amount of cut-through traffic on the street and therefore reducing conflicts between Project patrons and other users of West 102nd Street. Furthermore, the TIA determined that the

Project would provide adequate on-site storage capacity and would not result in queuing of vehicles onto West 102nd Street. Therefore, no significant effect related to geometric design features would result from Project implementation, and the Project would meet this criterion.

- **Result in inadequate emergency access?**

As discussed in the TIA, the Project would be constructed and operated without adversely affecting the surrounding roadway system. The evaluation of level of service and queuing at ten study area intersections and the Project driveways shows that the addition of Project traffic would not create any adverse effects, according to the City's adopted performance criteria. Additionally, while the Project would result in the installation of new landscaping features along West 102nd Street, existing sight lines would be preserved or improved, providing vehicles entering and exiting either driveway with adequate visibility of oncoming traffic. Thus, the Project would not result in a significant effect relating to emergency access and the Project would meet this criterion.

Conclusion: Based on the TIA, the Project would not result in a significant effect relating to traffic. For additional details, refer to the TIA provided in Attachment A of this memorandum.

Noise

The following review of potential noise impacts is based on the Noise and Vibration Technical Report prepared by ESA (included as Attachment B of this memorandum) for the Project. The Noise and Vibration Technical Report evaluates the potential noise and vibration impacts associated with construction activities, surface transportation, and other aspects of Project construction and operations that have the potential to impact noise sensitive land uses. The findings of the Noise and Vibration Technical Report that apply to the noise related questions included in Appendix G of the CEQA Guidelines are summarized below:

- **Would the Project result in the 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?**

Construction

As discussed in greater detail in the Noise and Vibration Technical Report (refer to Attachment B), construction of the Project would require the use of heavy equipment during construction activities at both the Hotel and Well Relocation Sites, where noise levels generated by construction of the Project were evaluated for daytime, nighttime, and off-site scenarios. To present a conservative impact analysis, the Project's estimated noise levels were calculated for a scenario in which all pieces of construction equipment were assumed to be operating simultaneously and to be located at the construction area nearest to the sensitive receptors. These assumptions represent the worst-case noise scenario because construction activities would typically be spread out throughout the Hotel and Well Relocation Sites, and, thus, some equipment would be farther away from the affected sensitive receptors.

As shown in Table 7 of the Noise and Vibration Technical Report, estimated maximum daily construction equipment noise levels generated by the Project would not exceed the City's noise thresholds with implementation of Project Design Features PDF-NOI-2 and PDF-NOI-3 (refer above). Therefore, the Project would not generate a substantial temporary increase in ambient daytime noise levels in the vicinity of the Project in excess of standards established in the noise ordinance and daytime noise impacts would be less than significant.

Since construction of Well #8 would require 24-hour well drilling, the Project was evaluated for nighttime noise levels. As shown in Table 8, with the incorporation of construction noise best management practices and Project Design Features PDF-NOI-2 through PDF-NOI-4 (refer above), construction noise levels were estimated to be less than the significance threshold of ambient nighttime noise levels at all sensitive receptors. Since the Project would not exceed the significance threshold, the Project would not generate a substantial temporary increase in ambient nighttime noise levels in the vicinity of the Project in excess of standards established in the noise ordinance and impacts would be less than significant.

The Project's maximum off-site construction noise levels would be generated during the construction period with the greatest number of truck trips, which would be during the building construction phase during mat foundation pours. The grading and excavation phase at the Hotel Site would overlap with the well drilling and installation of new casing phase at the Well Site and would require on a maximum construction activity day a total of approximately 72 truck trips (36 inbound and 36 outbound trips), 4 vendor trips (2 inbound and 2 outbound), and 112 worker trips (56 inbound and 56 outbound trips) per day. Approximately 10 truck trips (5 inbound and 5 outbound trips) per hour would be needed during the grading/excavation and well drilling & install new casing phases. Per PDF-NOI-5, haul truck trips traveling on Doty Avenue between 102nd Street and 104th Street will be prohibited. Haul trucks will be directed to travel to/from the Hotel Site by heading east on 102nd Street turning left on Yukon Avenue and turning left on Century Boulevard or heading east on 102nd Street turning left on Doty Avenue and turning left on Century Boulevard to reach the I-405 Freeway. Haul trucks will be directed to travel to/from the Well Site by heading east on 104th Street turning left on Yukon Avenue and turning left on Century Boulevard or heading west on 104th Street turning right on Prairie Avenue and turning left on Century Boulevard to reach the I-405 Freeway.

As shown in Table 9 of the Noise and Vibration Technical Report, the Project's truck trips and worker trips would generate a maximum noise level increase of approximately 4.8 dBA CNEL along 102nd Street east of Doty Avenue, which would not be an audible increase in traffic noise. The Project would not exceed the significance threshold of a 3 dBA CNEL increase to within the "normally unacceptable" or "clearly unacceptable" categories or the significant threshold of 5 dBA CNEL or greater noise increase for areas with occupied residential uses. Therefore, the Project's off-site construction noise would be less than significant.

Operation

For operational activities, the Noise and Vibration Technical Report evaluated each operational activity individually as well as combined; refer to the of the Noise and Vibration Technical Report for the discussions of the individual assessments. The evaluation of the combined noise from the Project's various operational noise sources (i.e., composite noise level) was conducted to conservatively ascertain the potential maximum Project-related noise level increase that may occur at the noise-sensitive receptor locations. Noise sources associated with the Project would include traffic on nearby roadways, open space, on-site mechanical equipment, loading area, and parking area. As shown in Table 16 of the Noise and Vibration Technical Report, the Project's composite noise contribution would not increase the ambient noise by more than 5 dBA and thus, would not exceed the applicable noise thresholds. Therefore, operational noise impacts associated with implementation of the Project would be less than significant.

- **Generation of excessive groundborne vibration or groundborne noise levels?**

Construction

Construction activities may generate groundborne vibration and groundborne noise from transient sources due to the temporary and sporadic use of vibration-generating equipment. Construction activities on the Project Site have the potential to generate groundborne vibration from the use of heavy equipment (i.e., drill rig, loaded truck) that generates vibrations that propagate through the ground. Groundborne vibrations from construction activities very rarely reach the levels that can damage buildings or structures, but they may be perceived in buildings very close to a construction site. Groundborne vibration diminishes in intensity with increasing distance from the source.

Receptors surrounding the Hotel Site include residential uses which have been assessed at a closest distance of 25 feet. Receptors surrounding the Well Relocation Site include residential and industrial land uses and are assessed at a distance of 25 feet during daytime activities and 50 feet during nighttime well drilling. Based on the Well Relocation Site plans, the well drilling would occur centrally within on the site and would be at a further distance than normal Well Relocation Site construction activities during the daytime. As shown in Table 17 of the Noise and Vibration Technical Report, the Project's construction related groundborne vibration impacts from off-site construction traffic would not result in the exposure of nearby off-site structures to the generation of vibration levels in excess of vibration significance thresholds. Therefore, groundborne vibration impacts related to structural damage would be less than significant.

With respect to human annoyance, the Federal Transit Administration's (FTA's) *Transit Noise and Vibration Impact Assessment* identifies residential buildings and institutional buildings that have vibration-sensitive equipment or have the potential for activity interference such as churches, as sensitive uses. As shown in Table 18 of the Noise and Vibration Technical Report, for large off-road vibration-generating equipment used at the closest distance to sensitive receptors, the vibration velocity levels would exceed the thresholds of 72 VdB for frequent events (more than 70 events per day), 75 VdB for occasional events (30 to 70 events per day), and 80 VdB for infrequent events. In accordance with Section 5-41 of the Inglewood Municipal Code, which prohibits construction between the hours of 8:00 p.m. and 7:00 a.m., construction vibration-generation activities would not occur during the nighttime hours when people normally sleep and would not occur on Sundays at the Hotel Site. Thus, compliance with Section 5-41 of the Inglewood Municipal Code would eliminate the potential for groundborne vibration and groundborne noise human annoyance impacts at the nearby residential uses at the Hotel Site during sensitive nighttime hours. The Well Relocation Site would require 24-hour construction activities during the well drilling phase and thus has potential to cause human annoyance to the surrounding receptors. Project Design Feature PDF-NOI-7 would limit the use of heavy duty construction equipment such as large bulldozers and bore/drill rigs within 80 feet, loaded trucks within 72 feet, jackhammers within 43 feet, and small bulldozers within 9 feet of any sensitive receptors between the hours of 8:00 p.m. and 7:00 a.m. Therefore, compliance with Section 5-41 of the Inglewood Municipal Code and implementation of Project Design Feature PDF-NOI-7, groundborne vibration and groundborne noise human annoyance impacts would be less than significant.

Operation

The primary source of vibration related to the operation of the Project would include vehicle circulation within the proposed above-grade and subterranean parking garage and off-site vehicular trips. As discussed above, vehicular-induced vibration poses no threat to buildings or structures. The Project would also include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include

vibration-attenuation mounts to reduce the vibration transmission. In addition, ground-borne vibration attenuates rapidly as a function of distance from the vibration source. Therefore, the Project is not anticipated to generate high levels of vibration.

According to the FTA, if the roadway is fairly smooth, the vibration from rubber-tired traffic is rarely perceptible, with the threshold of perception for humans at approximately 65 VdB.[7] The Project's parking areas would be paved with smooth and maintained surfaces and vehicles would be traveling at very low speeds minimizing vibration levels. Parking area vibration would also be confined to the immediate area and would not be expected to be perceptible off the Project Sites. Therefore, parking area vibration would not exceed the significance threshold of 72 dBA at off-site residential uses.

According to America Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE), pumps or compressors would generate groundborne vibration levels of 0.5 in/sec PPV at 1 foot.[8] At 25 feet, this vibration level drops to approximately 0.004 in/sec PPV (approximately 60 VdB), which is below the threshold.[9] Furthermore, Project mechanical equipment, including air handling units, condenser units, and exhaust fans, would be located on building rooftops reducing the potential for vibrations to cause noticeable groundborne vibration and groundborne noise off the Project Site. Therefore, groundborne vibration from the operation of such mechanical equipment would not impact any of the off-site sensitive receptors. As a result, groundborne vibration and groundborne noise vibration impacts from Project operation would be less than significant.

- **For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

The Project Site is partially located within the Planning Boundary/Airport Influence Area for the LAX Airport as designated within the Los Angeles County ALUP. The Project Site falls within the Airport Influence Area and Airport Compatibility Zone for LAX for the southern LAX runway, where the majority of the Project Site is within the 65 dBA CNEL noise contour. The Project Site is not located within the designated Airport Influence Area for the Hawthorne Municipal Airport. Project Design Feature PDF-NOI-8 requires noise-sensitive development within the 65 dB CNEL of LAX to be designed and to provide noise insulation so as to meet City noise standards. Therefore, with implementation of Project Design Feature PDF-NOI-8, impacts would therefore be less than significant.

Conclusion: Based on the Noise and Vibration Technical Report, the Project would not generate construction or operational noise or vibration levels that would exceed the applicable thresholds and impacts would be less than significant with implementation of Project Design Features PDF-NOI-1 through PDF-NOI-8. For additional details, refer to the Noise and Vibration Technical Report provided in Attachment B of this memorandum.

Air Quality

The following review of potential air quality impacts is based on the Air Quality Technical Report prepared by ESA (included as Attachment C of this memorandum) for the Project. The Air Quality Technical Report evaluates

7 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, pages 112 and 113, 2018.

8 America Society of Heating, Refrigerating and Air-Conditioning Engineers, Inc., Heating, Ventilating, and Air-Conditioning Applications, 1999.

9 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, pages 111, 184 and 185, 2018.

the potential air quality impacts associated with construction activities, mobile sources, building energy demand, and other aspects of Project construction and operations that have the potential to generate criteria air pollutant emissions. The findings of the Air Quality Technical Report that apply to the air quality related questions included Appendix G of the CEQA Guidelines are summarized below.

- **Conflict with or obstruct implementation of the applicable air quality plan?**

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

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

Criterion 1

As discussed in the AQTR (Attachment C), SO_2 emissions would be negligible during construction and long-term operations and, therefore, would not have the potential to cause or effect a violation of the SO_2 ambient air quality standard. Since VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. However, due to the role VOCs play in O_3 formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

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

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

The Project would not introduce any substantial stationary sources of emissions; therefore, CO is the appropriate benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations.[10] As determined in the AQTR, no intersections would result in a CO hotspot in excess of the ambient air quality standards, and impacts would be less than significant. Therefore, the Project would not increase the frequency or severity of an existing CO violation or cause or contribute to new CO violations.

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

Criterion 2

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

Air Quality Management Plan Consistency

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

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

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

Construction

Control Strategies

During its construction phase, the Project would ensure compliance with CARB's requirements to minimize short-term emissions from on-road and off-road diesel equipment, and with SCAQMD's regulations such as Rule 403 for controlling fugitive dust and Rule 1113 for controlling VOC emissions from architectural coatings.

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

Furthermore, the Project would utilize off-road diesel equipment greater than 25 hp that meet USEPA Tier 4 Final off-road emission standards, as per PDF-AIR-1. Compliance with these features and requirements would be consistent with and meets or exceeds the 2022 AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

Growth Projections

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

Operations

Control Strategies and Policy Consistency

The Project design and land uses render it consistent with the 2022 AQMP during operations. As discussed in the AQTR, the 2022 AQMP include transportation control strategies from the 2020-2045 RTP/SCS that are intended to reduce VMT and resulting regional mobile source emissions. The majority of these strategies are to be implemented by cities, counties, and other regional agencies such as SCAG and SCAQMD, although some can be furthered by individual development projects.

The Project location would support land use and transportation control strategies related to reducing vehicle trips for residents, patrons and employees by increasing hotel and associated use density near public transit. The Project is considered an "urban infill" project, as it further develops existing low density property within an already developed urban area. The Project is accessible to and well served by public transit including frequent and comprehensive transit services. Specifically, the Project is located in an urban setting and is well served by a network of regional transportation facilities. Various public transit stops operated by the Los Angeles County Metropolitan Transportation Authority (Metro) as the Project is less than one mile from public transit options including the Los Angeles County Metropolitan Transportation Authority (Metro) Green Line's Hawthorne/Lennox Station. The Metro Green Line provides light rail service between Redondo Beach and Norwalk and serves the communities of El Segundo, Hawthorne, South Los Angeles, Lynwood, and Downey. In addition, the Metro Crenshaw/LAX Line provides light rail connection between the existing Metro Exposition Line and the Metro Green Line. The Crenshaw/LAX Line serves the cities of Los Angeles, Inglewood, Hawthorne, and El Segundo, and portions of unincorporated Los Angeles County. The Crenshaw/LAX Line also provides light rail service to LAX. The Project Site is also served by multiple Metro bus lines including bus lines 117, 211/215, 212, and The Link – Lennox. This analysis provides evidence of the Project's consistency with the 2016 AQMP's goal of reducing mobile source emissions as a source of NO_X and PM2.5. The Project's mobile source emissions are calculated based on the trips generated by the Project, as obtained from the Project's TIA (Attachment A), [11] which consider the Project Site's location within the City and incorporates trip reductions from the land use characteristics. Thus, Project development is consistent with the 2022 AQMP with respect to transportation control strategies from

[11] Fehr and Peers, The Arya Hotel & Wellness Center Transportation Impact Analysis, December 2023.

the 2016-2040 and 2020-2045 RTP/SCS that are intended to reduce VMT and resulting regional mobile source emissions.

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

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

Growth Projections

The Project is anticipated to be fully operational in 2026. The Project's growth would be consistent with the growth projections contained in the 2020-2045 RTP/SCS, which forms the basis of the growth projections in the 2022 AQMP.

Based on the 2020–2045 RTP/SCS growth projections, the Project would result in an increase in the number of employees on the Project Site of approximately 209 new employees, which would comprise approximately 12.5 percent of SCAG's year 2026 estimated increase of 1,669 employees within the City and approximately 2.8 percent of SCAG's 2045 estimated increase of 7,510 employees within the City relative to 2022.[12,13] However, the Project would have a small effect on the overall employment projections for the City. The Project's contribution to employment would be consistent with SCAG's 2020-2045 RTP/SCS goals, as well as the 2020-2045 RTP/SCS employment projections for the City that the growth projections in the 2022 AQMP are based on. As a result, the Project would not conflict with the growth projections used in the development in the 2022 AQMPs. Impacts would be less than significant.

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

General Plan Air Quality-Related Policies

As discussed above, the City of Inglewood General Plan Land Use Element includes a goal relevant to air pollutant emissions.

Circulation Goal: Promote and support adequate public transportation within the City and the region.

The Project constitutes an infill development integrating hotel and associated uses that supports public transportation. The Project would include provisions that would promote the use of public transportation as a means of travel to and from the Project, including service from a network of regional transportation facilities and is less than one mile from public transit options including the Los Angeles County Metropolitan Transportation Authority (Metro) Green

12 Fehr and Peers, The Arya Hotel & Wellness Center Transportation Impact Analysis, December 2023.

13 SCAG, Final 2020 RTP/SCS, 2020. Demographics & Growth Forecast Appendix.

Line's Hawthorne/Lennox Station. The Metro Green Line provides light rail service between Redondo Beach and Norwalk and serves the communities of El Segundo, Hawthorne, South Los Angeles, Lynwood, and Downey. In addition, the Metro Crenshaw/LAX Line provides light rail connection between the existing Metro Exposition Line and the Metro Green Line. The Crenshaw/LAX Line serves the cities of Los Angeles, Inglewood, Hawthorne, and El Segundo, and portions of unincorporated Los Angeles County. The Crenshaw/LAX Line also provides light rail service to LAX. The Project Site is also served by multiple Metro bus lines including bus lines 117, 211/215, 212, and The Link – Lennox. For these reasons, the Project would be consistent with the City's General Plan policies relevant to air quality.

Air Quality-Related Policies from the Inglewood Energy and Climate Action Plan

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. These strategies include:

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

Although the actions presented under Strategy 1 are for the City to implement, the Project would support implementation of these actions as the Project would be designed in accordance with the 2022 CALGreen Building Standards and include the required mandatory energy and emission saving features as detailed under PDF-AIR-2 Design Elements above. This would serve to reduce energy use in the proposed buildings as well as require the installation of electric vehicle charging stations. The Project would also be consistent with Strategy 4 because as mentioned above, the Project would be served by a network of public transit options less than one mile from the Los Angeles County Metropolitan Transportation Authority (Metro) Green Line's Hawthorne/Lennox Station. The Metro Green Line provides light rail service between Redondo Beach and Norwalk and serves the communities of El Segundo, Hawthorne, South Los Angeles, Lynwood, and Downey. In addition, the Metro Crenshaw/LAX Line provides light rail connection between the existing Metro Exposition Line and the Metro Green Line. Furthermore, the Project would provide hotel and associated uses on parcels of infill urban land accessible to and served by public transit and near existing and planned housing. For the reasons described above, the Project would be consistent with the City's ECAP.

- **Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?**

As discussed in the AQTR (Attachment C), the Project would contribute to local and regional air pollutant emissions during construction (short-term or temporary) and occupancy (long-term). Based on the analysis in the AQTR, construction would result in less than significant impacts relative to the maximum daily emissions as compared to the SCAQMD regional significance thresholds for construction criteria air pollutant emissions in which the region is non-attainment under the CAAQS or NAAQS (i.e., ozone precursors of VOCs and NO_X, PM10, and PM2.5). Operation of the Project would result in less than significant impacts relative to the maximum daily emissions as compared to the SCAQMD regional significance thresholds for operational criteria air pollutant emissions in which the region is non-attainment under the CAAQS or NAAQS (i.e., ozone precursors of VOCs and NO_X, PM10, and PM2.5). As shown below, construction and operational emissions would not exceed the SCAQMD regional significance thresholds for attainment, maintenance, or unclassifiable criteria air pollutants (i.e., CO and SO_2).

Construction Emissions

Construction of the Project has the potential to generate temporary regional criteria pollutant emissions through the use of heavy-duty construction equipment, such as backhoes and forklifts, through vehicle trips generated by workers and haul trucks traveling to and from the hotel site and Well Relocation Site of the Project, and through building activities such as the application of paint and other surface coatings. In addition, fugitive dust emissions would result from demolition and various soil-handling activities.

The maximum daily construction emissions for the Project were estimated for each construction phase. The results of the criteria pollutant calculations are presented in Table 6 of the AQTR. Emissions include dust control measures required by SCAQMD Rule 403 (Control of Fugitive Dust) and fugitive VOC control measures to be implemented by architectural coating emission factors required by SCAQMD Rule 1113 (Architectural Coatings). In addition, as included in PDF-AIR-1, the Project would require the use of all off-road diesel construction equipment greater than 25 hp that will be used an aggregate of 40 or more hours to meet the USEPA Tier 4 Final off-road emission standards. As shown in Table 6 of the AQTR, construction-related daily emissions would not exceed the SCAQMD numeric indicators of significance and emissions levels would be below the applicable numeric indicators. As the Project's maximum regional emissions from construction would be below the regional numeric indicators, regional construction emissions impacts would be less than significant.

Operational Emissions

Operational criteria pollutant emissions were calculated for mobile, area, and stationary sources (such as the conservatively assumed emergency generator) for the hotel and associated uses of the Project operational year, 2026. Operations would adhere to the applicable codes including 2022 Title 24 Green Building Code. Operational emission estimates include compliance with SCAQMD Rule 1113 (Architectural Coatings), which limits the VOC content of architectural coatings. Further as mentioned above, there are no operational air quality emissions associated with the relocated well as the relocated well does not require any routine operational activities and does not contain any operational emission sources.

Daily trip generation rates for the Project were provided by the Project's TIA (Attachment A) and include trips associated with the proposed hotel and associated uses.[14] Natural gas usage factors are based on recreational and retail data from the CEC, and landscape equipment emissions are based on off-road emission factors from CARB.

[14] Fehr and Peers, The Arya Hotel & Wellness Center Transportation Impact Analysis, December 2023.

Emissions from the use of consumer products and the reapplication of architectural coatings are based on data provided in CalEEMod.

The results of the regional criteria pollutant emission calculations for VOC, NO_X, CO, SO_2, PM10, and PM2.5 are presented in Table 7 of the AQTR. The Project's operational-related daily emissions would not exceed the SCAQMD numeric indicators for any criteria pollutants. As the Project's maximum regional emissions from operational activities would be below the regional numeric indicators, regional operational emissions impacts would be less than significant.

Cumulative Impacts

The SCAQMD's approach for assessing cumulative impacts related to operations or long-term implementation is based on attainment of ambient air quality standards in accordance with the requirements of the CAA and California Clean Air Act. As discussed earlier, the SCAQMD has developed a comprehensive plan, the AQMP, which addresses the region's cumulative air quality condition.

A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or California non-attainment pollutant. Because the Los Angeles County portion of the Air Basin is currently in non-attainment for ozone, NO_2, PM10, and $PM_{2.5}$, cumulative projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and the SCAQMD.

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the Project's incremental contribution to cumulative air quality impacts is determined based on compliance with the SCAQMD adopted the AQMP. As discussed above, the Project would not conflict with or obstruct implementation of the AQMP and would be consistent with the growth projections in the AQMP.

Nonetheless, SCAQMD no longer recommends relying solely upon consistency with the AQMP as an appropriate methodology for assessing cumulative air quality impacts. The SCAQMD recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality. As shown in Table 6 and 7 of the AQTR, the Project's regional emissions would be below SCAQMD significance thresholds. In particular, non-attainment pollutant emissions of ozone precursors and particulate matter would not exceed the SCAQMD significance thresholds. The formation of ground-level ozone is a complex process due to photochemical reactions of precursor pollutants (i.e., VOC and NO_X emissions) in the atmosphere in the presence of sunlight. Meteorological factors, such as wind, would result in dispersive effects of pollutants, including ozone precursor and particulate matter emissions, which are dispersed horizontally downwind and through vertical mixing. It is unlikely that the Project's emissions, which would not exceed the SCAQMD significance thresholds, would result in a substantial measurable increase in the respective pollutant concentrations in the Air Basin to a degree that clearly predictable and identifiable heath impacts would specifically result from this Project's emissions. Therefore, the Project's incremental contribution to long-term emissions of non-attainment pollutants and ozone precursors, considered together with cumulative projects, would not be cumulatively considerable, and therefore the cumulative impact of the Project would be less than significant.

- **Expose sensitive receptors to substantial pollutant concentrations?**

Localized Construction Emissions

As explained in the AQTR (Attachment C), the localized construction air quality analysis was conducted using the methodology prescribed in the SCAQMD *Final Localized Significance Threshold Methodology* (June 2003, revised

July 2008).[15] The maximum daily localized emissions for each of the construction phases and the localized significance thresholds are presented in Table 8 of the AQTR. As shown in Table 8, maximum localized construction emissions for sensitive receptors would be below the localized screening indicators for NO_X, CO, PM10, and PM2.5, therefore, with respect to localized construction emissions, impacts to sensitive receptors would not be potentially significant. As the Project's maximum localized construction emissions would not exceed the localized numeric indicators for NO_X, CO, PM10, and PM2.5, its construction emissions impacts to sensitive receptors would be less than significant.

Localized Operational Emissions

The screening criteria provided in the Localized Significance Threshold Methodology were used to determine the localized operational emissions numerical indicators of significance for the Project. The maximum daily localized emissions and the localized significance thresholds are presented in Table 9 of the AQTR. As the Project's maximum localized operational emissions would not exceed the localized numeric indicators for NO_X, CO, PM10, or PM2.5, operational emissions impacts to sensitive receptors would be less than significant.

Carbon Monoxide Hotspots

The potential for the Project to cause or contribute to CO hotspots was evaluated by comparing Project intersections (both intersection geometry and traffic volumes) with prior studies conducted by the SCAQMD in support of their AQMPs and considering existing background CO concentrations. As discussed below, this comparison demonstrates that the Project would not cause or contribute considerably to the formation of CO hotspots, that CO concentrations at Project-impacted intersections would remain well below the threshold one-hour and eight-hour ambient air quality standards (CAAQS), respectively within one-quarter mile of a sensitive receptor, and that no further CO analysis is warranted or required.

As shown in Table 2 of the AQTR, CO levels in the Project Site area are substantially below the Federal and the State standards. Maximum CO levels in recent years were 1.8 ppm (one-hour average) and 1.5 ppm (eight-hour average) as compared to the criteria of 20 ppm (CAAQS one-hour average) or 35 ppm (NAAQS one-hour average) and 9.0 ppm (eight-hour average). No exceedances of the CO standards have been recorded at monitoring stations in the Air Basin for some time,[16] and the Air Basin is currently designated as a CO attainment area for both the CAAQS and the NAAQS.

The SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Air Basin. These include: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; and (d) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP CO attainment demonstration, the SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day.[17] Therefore, projects that result in traffic at any intersection of less than 100,000 vehicles per day would be considered to be less than significant.

Based on the Project's traffic study, under the Future with Project Conditions (2026), the intersection of Hughes Avenue and Venice Boulevard would have a maximum traffic volume of approximately 33,594 average daily trips

15 SCAQMD, Final Localized Significance Threshold Methodology.

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

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

under the Project buildout scenario.[18] As the Project does not result in 100,000 vehicles per day at any study area intersection, this comparison demonstrates that the Project would not contribute to the formation of CO hotspots and that no further CO analysis is required. The Project would not contribute to the formation of CO hotspots and no further CO analysis is required. Therefore, the Project would result in less than significant impacts with respect to CO hotspots.

Toxic Air Contaminants

Construction

The Project's health risk calculations were performed using a spreadsheet tool consistent with the Office of Environmental Health Hazard Assessment (OEHHA) guidance, which incorporates the algorithms, equations, and a variable described above as well as in the OEHHA guidance and incorporates the results of the AERMOD dispersion model. Table 10 of the AQTR, summarizes the cancer risk and non-cancer impacts for the maximum impacted sensitive receptors.

The cancer risk from DPM emissions from construction of the Project is estimated to result in a maximum cancer risk of approximately 8.9 per million, below the SCAQMD's significance threshold. As shown in Table 10 of the AQTR, the Project would not result in a chronic hazard index greater than 1.0; therefore, chronic health risks would be less than significant. The maximum impacts would occur at a residential property across the service alley. As discussed previously, the lifetime exposure under OEHHA guidelines considers early life (infant and children) exposure. The calculated cancer risk is estimated for outdoor exposure and assumes that sensitive receptors (residential uses) would not have any mitigation such as mechanical filtration and that residential uses would have continuously open windows. As the maximum cancer risk and non-cancer impacts would be less than the SCAQMD significance thresholds, impacts would be less than significant.

Short-term construction emissions would not substantially contribute to a significant health risk. No residual emissions and corresponding individual cancer risk are anticipated after Project construction. Thus, construction activities would not expose sensitive receptors to substantial toxic air contaminant concentrations, and construction-related health impacts would be less than significant.

Operation

The SCAQMD recommends that operational health risk assessments be conducted for substantial sources of operational diesel particulate matter (DPM) (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.[19] Project operations would generate only minor amounts of diesel emissions from mobile sources, such as delivery trucks and occasional maintenance activities that would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Furthermore, Project trucks would be required to comply with the applicable provisions of the CARB 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM and NO_X emissions from existing diesel trucks. Therefore, Project operations would not be considered a substantial source of diesel particulates.

In addition, Project operations would only result in minimal emissions of toxic air contaminants from maintenance or other ongoing activities, such as from the maintenance and testing of the emergency generator and use of

18 Fehr and Peers, The Arya Hotel & Wellness Center Transportation Impact Analysis, December 2023.

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

architectural coatings and other products. The emergency generator would be operated for a maximum of 50 hours annually and a maximum of 2 hours per day for maintenance activities. It would also be subject to SCAQMD air permitting requirements and new source review. With respect to the use of consumer products and architectural coatings, the office and retail uses associated with the Project would be expected to generate minimal emissions from these sources. The Project's land uses would not include installation of industrial-sized paint booths or require extensive use of commercial or household cleaning products. As a result, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal, regulated, and controlled, and would not be expected to exceed the SCAQMD numerical indicator of significance. Thus, operation of the Project would not expose sensitive receptors to substantial toxic air contaminant concentrations and operational impacts would be less than significant.

- **Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

As discussed in the AQTR (Attachment C), potential activities that may emit odors during construction include the use of architectural coatings and solvents, as well as the combustion of diesel fuel in on-and off-road equipment. SCAQMD Rule 1113 would limit the amount of VOCs in architectural coatings and solvents. In addition, the Project would comply with the applicable provisions of the CARB Air Toxics Control Measure regarding idling limitations for diesel trucks. Through mandatory compliance with SCAQMD Rules, no construction activities or materials are expected to create objectionable odors affecting a substantial number of people. Furthermore, as shown in Table 6 (regional) and Table 8 (localized), of the AQTR, construction emissions would not exceed the SCAQMD significance thresholds for attainment, maintenance, or unclassifiable criteria air pollutants (i.e., CO and SO_2). Therefore, construction activities would result in less than significant impacts with respect to other emissions, including those leading to odors.

According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project does not include any uses identified by the SCAQMD as being associated with substantial odors. As a result, the Project is not expected to discharge contaminants into the air in quantities that would cause a nuisance, injury, or annoyance to the public or property pursuant to SCAQMD Rule 402. Furthermore, as shown in Table 7 (regional) and Table 9 (localized), of the AQTR, daily operational emissions would not exceed the SCAQMD significance thresholds for attainment, maintenance, or unclassifiable criteria air pollutants (i.e., CO and SO_2). Therefore, operation of the Project would result in less than significant impacts with respect to other emissions, including those leading to odors.

Conclusion: Based on the AQTR prepared for the Project, the Project would not result in a significant effect relating to air quality. For additional details, refer to the AQTR provided in Attachment C of this memorandum.

Water Quality

The following analysis of potential water quality impacts addresses the water quality related questions include in Appendix G of the CEQA Guidelines.

- **Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**

Point-source pollutants are discharged directly from pipes or spills. Raw sewage draining from a pipe directly into a stream is an example of a point-source water pollutant. The Project consists of the development of luxury hotel and construction of the proposed Well #8 and would not include any uses that would generate point source pollutants. Therefore, water quality impacts due to point sources would be less than significant.

Non-point-source pollutants (NPS) cannot be traced to a specific original source. NPS pollution is caused by rainfall moving over and through surface areas. As the runoff moves, it picks up and carries away natural and human-made pollutants, finally depositing them directly or indirectly into lakes, rivers, wetlands, coastal waters, and even underground sources of drinking water. These pollutants can include: excess fertilizers, herbicides and insecticides from residential areas; oil, grease, and toxic chemicals from urban runoff; sediment from improperly managed construction sites, eroding areas with bare or unvegetated soils; bacteria and nutrients from pet wastes, and faulty sewer systems; and atmospheric deposition and hydro modification.

The Project would be subject to existing regulations associated with the protection of water quality. Construction activities would be carried out in accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit issued by the Los Angeles Regional Water Quality Control Board (LARWQCB), as applicable. Temporary excavations of up to 24.5 feet maximum depth are anticipated to construct the proposed subterranean parking level on the Hotel Site. As excavations for the subterranean parking structure would not extend beyond the historic groundwater, which was encountered at depths of 50 feet below ground surface (bgs), dewatering would not be required during construction or operation. For construction of the proposed Well #8, drilling activities would extend down approximately 350 feet below ground, which would extend into the groundwater aquifer. However, the proposed Well #8 is intended to reach the groundwater aquifer as it would serve as a groundwater production source for the City, where all construction activities would comply with the applicable well drilling requirements and regulations to ensure impacts to groundwater are minimized.

As construction of the Project would involve grading, including the export of approximately 53,610 cubic yards of soil across the Hotel and Well Relocation Sites, the Applicant would be required to submit a Storm Water Pollution Prevention Plan (SWPPP) to the City of Inglewood Public Works Department as the Project would disturb more than one acre of soil. Consistent with the SWPPP, the Project would implement best management practices (BMPs) to manage storm water drainage during construction through methods such as retention basins of sufficient size; filtering by use of a barrier system, wattle or other method approved by the enforcing agency prior to being conveyed to a public drainage system; compliance with a lawfully enacted storm water management ordinance in order to avoid discharging pollutants into waterways; or other approved method. Pursuant to Section 10-208, *Low Impact Development Requirements for New Development and Redevelopment,* of the City's Municipal Code, the Project Applicant would prepare and submit a Stormwater Mitigation Plan that would include set Low Impact Development (LID) standards and practices for stormwater pollution mitigation consistent with Article 16 of the IMC and the LID Standards Manual to the City's Director for review and approval. Therefore, development of the Project would not result in any significant effects relating to water quality due to construction activities.

As an urban commercial development, operation of the Project would add typical, urban, nonpoint-source pollutants to storm water runoff. These pollutants are permitted by the countywide Municipal Separate Storm Sewer System (MS4) permit and would not exceed any receiving water limitations. In addition, the Project would comply with County and City LID requirements, which require implementation of a stormwater treatment system that captures

the 85th percentile runoff for treatment. Furthermore, since there are currently no existing drainage features or water quality measures on site, the Project would improve the current drainage condition with compliance with the County and City's LID requirements. Therefore, operation of the Project would not violate any water quality standards or waste discharge requirements and would have no related significant impacts.

- **Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

As required by Section 303(d) of the Clean Water Act, the State and the Regional Water Boards assess water quality data for California's waters every two years to determine if they contain pollutants at levels that exceed protective water quality criteria and standards.[20] The LA RWQCB most recently prepared a list of impaired waterbodies in the region as part of the 2016 assessment cycle. This list is referred to as the 303(d) list. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load. The nearest water body to the Project Site that has been identified as an impaired water body is the Dominguez Channel (lined portion above Vermont Avenue), located between West 116th Street and Vermont Avenue, approximately one mile southeast of the Project Site. Impairment for the Dominguez Channel (lined portion above Vermont Avenue) include toxic pollutants, bacteria, and metals.

In terms of polluted runoff, the Project's proposed uses would be typical of hotel and utility uses and would not introduce substantial sources of polluted water that a use such as an industrial use would generate, for example. As described above, the Project is required to comply with County and City LID requirements, which require implementation of a stormwater treatment system that captures the 85th percentile runoff volume for treatment. In compliance with this requirement, the Project would implement a capture and reuse system, which would serve to address any potential polluted runoff generated by the Project. As such, the Project would not conflict with or obstruct any water quality control plans for the Dominguez Channel. No other water quality control plans or sustainable groundwater management plans would be affected by development of the Project.

Conclusion: Based on the above analysis, the Project would not result in a significant water quality impact.

Conclusion for Criterion (d)

As the Project would result in less than significant impacts with respect to traffic, noise, air quality, and water quality, the Project would meet this criterion.

Criterion (e): The site can be adequately served by all required utilities and public services.

Utilities

The Project would be located in an existing urban area that is served by existing public utilities and services. A considerable increase in demand for services or utilities would not be anticipated with the implementation of the Project since it is the redevelopment of a parcel occupied with a light manufacturing and retail use and represents urban infill. The Project would be consistent with the General Plan Land Use Element and Zoning Code designations and would be consistent in terms of use and intensity of development that is allowed on the Project Site. In addition, implementation of the Project would also construct the proposed Well #8 on the Well Relocation Site, where operation of the proposed Well #8 would provide the City the ability to increase its groundwater

[20] State Water Resources Control Board, 2019, Impaired Water Bodies, https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2014_2016.shtml. Accessed September 2022.

production within its current groundwater rights, which in turn would help the City to support its water demand and would reduce dependence on imported water supplies. Therefore, the Project would meet this criterion.

Communications

Low-voltage communications infrastructure, used for internet and telephone connectivity, is currently located along West 102nd Street. The existing infrastructure would be used for the proposed hotel. Therefore, the Project would not require the construction or expansion of communication facilities.

Stormwater

Existing catch basins are located near the intersection of West 102nd Street and South Doty Avenue. Runoff from the Project Site is and would continue to be collected on the site and directed towards existing catch basins in the vicinity. The Project would be designed to comply with County and City LID design standards. Therefore, the Project would not require the construction or expansion of stormwater facilities.

Domestic Water

Golden State Water Company (GSWC) provides water to the Project Site. Consistent with the California Urban Water Management Planning Act (California Water Code [CWC] Division 6, Part 2.6, Sections 10610-10656), which addresses several state policies regarding water conservation and the development of water management plans to ensure the efficient use of available supplies, The City of Inglewood has an adopted Urban Water Management Plan (UWMP), which is updated every five years. The City of Inglewood adopted the 2020 UWMP in July 2021, which addresses short-term and long-term demand management measures to meet growing water demands during normal, dry, and multiple-dry years.

The Project is located within the Inglewood International Business Park Specific Plan area of Inglewood and would be consistent in terms of use and intensity of development that is allowed on the Project Site. The Project would comply with all applicable requirements regarding water conservation.

As discussed in the water reliability section of the 2020 UWMP, the City of Inglewood expects to have a reliable supply of up to 12,000 acre-feet of water in 2045.[21] Therefore, compliance with applicable requirements would ensure that impacts related to water supply would be less than significant.

With regard to domestic water infrastructure, the Project would connect to the existing water mains located in West 102nd Street. The main located in West 102nd Street would be used for fire suppression. No modifications to the infrastructure that is located outside of the property line would be necessary. As required by the City, the Applicant would coordinate with GSWC in order to ensure that existing and/or planned water conveyance facilities are capable of meeting water demand/pressure requirements. The proposed sizes and locations for the domestic water and fire water points of connection would be determined by the GSWC and the Los Angeles County Fire Department (LACoFD), respectively. The Applicant would pay all applicable development fees. Therefore, the Project would not require the construction or expansion of water treatment facilities that would cause significant environmental effects.

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21 City of Inglewood, 2021, City of Inglewood 2020 Urban Water Management Plan, July 2021, page 7-9 through 7-10, https://wuedata.water.ca.gov/public/uwmp_attachments/4744519889/GSWC-Culver%20City%202020%20UWMP%20Final.pdf. Accessed September 2022.

In terms of water supply, the Project would comply with applicable water conservation measures required by the City. The Project would be consistent in terms of use and intensity of development with the General Plan Land Use Element and Zoning Code designations on the property. In addition, implementation of the Project would also construct the proposed Well #8 on the Well Relocation Site, where operation of the proposed Well #8 would provide the City the ability to increase its groundwater production within its current groundwater rights, which in turn would help the City to support its water demand and would reduce dependence on imported water supplies. Therefore, the Project would not result in the need for new or expanded entitlements.

Electricity

Electrical service to the Project Site is provided by Southern California Edison (SCE). Electrical service currently exists on West 102nd Street (via overhead lines). The Project would connect to the existing electrical grid that already serves the site and would not require additional electrical service to be developed for the Project. Therefore, the Project would not require the construction or expansion of electrical facilities.

Wastewater

With regard to wastewater, the Project would comply with water conservation policies and applicable wastewater regulations, which would be verified during the permit and approval process. The Project would connect to the existing main along West 102nd Street. Therefore, the Project would not require the construction or expansion of wastewater treatment facilities.

Solid Waste

Solid waste collection services are currently provided to the Project Site by private haulers contracted by the City for this service area. The Project would not require the expansion or construction of a new solid waste disposal or recycling facility to handle Project-generated waste because the existing facilities have sufficient capacity to accommodate the Project's waste. As described in the Los Angeles Countywide Integrated Waste Management Plan (CoIWMP) 2019 Annual Report, future disposal needs over the next 15-year planning horizon (2034) would be adequately met through the use of in-County and out-of-County facilities through a number of strategies that would be carried out over the years.[22] It should also be noted that with annual reviews of demand and capacity in each subsequent CoIWMP Annual Report, the 15-year planning horizon provides sufficient lead time for the County to address any future shortfalls in landfill capacity. In addition, the Project would also provide recycling bins on-site for use by the proposed office use. Therefore, the Project would not require the construction or expansion of solid waste facilities.

Natural Gas Service

The Southern California Gas Company (SoCal Gas) provides natural gas services to the City of Inglewood and to the Project Site. The Project Site is currently served from existing natural gas lines in West 102nd Street. Therefore, the Project would not require the construction or expansion of natural gas facilities.

Public Services

Fire Protection

Fire protection and emergency medical services for the Project Site are provided by LACoFD. As the Project Site is located in an urbanized area within the City of Inglewood, it is well served by LACoFD. The Project Site is

[22] Los Angeles County Public Works Department, 2020, Countywide Integrated Waste Management Plan Annual Report, September 2020, https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF. Accessed September 2022.

located within Division VI, Battalion 20, of LACFD's Central Regional Operations Bureau.[23,24] The closest fire station to the Project Site is LACoFD Station 170, located at 10701 South 10th Avenue, approximately 0.8 mile southeast of the Project Site. LACoFD Stations 18, 95, 171 (headquarters), 172 and 173 are located less than three miles from the Project Site. The proposed luxury hotel development would comply with fire protection design standards, as necessary, per the California Building Code, California Fire Code, IMC, and LACoFD, to ensure adequate fire protection. Inglewood's standard conditions of approval generally require that plans for building construction, fire flow requirements, fire protection devices (e.g., sprinklers and alarms), fire hydrants and spacing, and fire access including ingress/egress, turning radii, driveway width, and grading would be prepared for review and approval by LACoFD. In light of the Projects compliance with the California Building Code, California Fire Code, and the IMC, pursuant to associated reviews and approvals by LACoFD, and its close proximity to LACoFD Station 170, the Project would have adequate fire protection services.

Police Protection

Police protection for the Project Site is provided by the Inglewood Police Department (Inglewood PD). As the Project Site includes a use that is currently served by the Inglewood PD, and is located in an urbanized area within the City of Inglewood, it is well served by the Inglewood PD. The Inglewood PD operates from a single police station (the Inglewood Police Station), located at 1 West Manchester Boulevard, approximately 1.6 miles northwest of the Project Site. The Project would include a 24-hour/seven-day video surveillance security program to ensure the safety of Project employees and visitors. The cameras would be located to capture views at the perimeter of the building, at main pedestrian and vehicular entries and at stair/elevator lobbies. Site security features would also include building access/design to assist in crime prevention efforts and to reduce the demand for police protection services, including the lighting of entryways and public areas. Although the occupancy of the Project Site would increase over existing conditions, the added security measures would reduce demand for police protection services. In light of the Projects security features, the existing level of police services on the Project Site and in the surrounding area, and its close proximity to the Inglewood PD station, the Project would have adequate police protection services.

Conclusion for Criterion (e)

As the Project would result in less than significant impacts with respect to utilities and public services, the Project would meet this criterion.

Exceptions to Categorical Exemption

CEQA Guidelines Section 15300.2 lists six exceptions to a categorical exemption. These exceptions include the following conditions:

a. Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

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23 County of Los Angeles, 2021. LACoFD Division Boundaries. https://geohub.lacity.org/datasets/lacounty::lacofd-division-boundaries-feature-layer/explore?location=33.986118%2C-118.337594%2C12.94. Accessed August 2022.

24 County of Los Angeles, 2021. LACoFD Battalion Boundaries. https://geohub.lacity.org/datasets/lacounty::lacofd-battalion-boundaries-feature-layer/explore?location=33.940743%2C-118.337808%2C12.94. Accessed August 2022.

b. Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

c. Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

d. Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

e. Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

f. Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

The analysis below demonstrates that the Project or its circumstances would not result in any exceptions identified in CEQA Guidelines Section 15300.2.

Criterion Section 15300.2(a): Location

Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located - a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

This exception applies to CEQA exemptions under Classes 3, 4, 5, 6, and 11. This Project qualifies as a Class 32 (Infill Development) Categorical Exemption, and therefore this criterion section is not applicable to this exemption. In addition, the Project Site is located in a previously developed urban infill location surrounded by existing urban uses and is not located in a particularly sensitive environment.

Criterion Section 15300.2(b): Cumulative Impact

All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type and in the same place, over time is significant.

Under this exception, exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant. There is no evidence of a potential significant cumulative impact because successive projects of the same type in the same place have not been approved and are not currently proposed. A total of 104 related projects were identified. Of these, the related projects in the vicinity of the Project include: 1) the Intuit Dome project; 2) the 3900 West Century Boulevard project (a hotel renovation located approximately 570 feet northwest of the Project Site); 3) the 3846 West Century Boulevard project (a 6-story self-storage facility located approximately 620 feet north of the Project Site); 4) the 3700 102nd Street project (a 5-story self-storage facility located approximately 780 feet east of the Project Site); 5) the 4041, 4049-4055 Century Boulevard project (a hotel located approximately 1,643 feet northwest of the Project Site); 6) the Century Boulevard/Club Drive project (an electronic billboard located approximately 2,380 feet northeast of the Project Site); and 7) the 4200 Century Boulevard Project (a 13-story mixed-use building located approximately 2,464 feet northwest of the Project Site).

Given the size and type of uses proposed for the above listed related projects, project-level or cumulatively significant impacts are not anticipated. The related projects would adhere to similar City requirements as the Project related to water quality, utilities, and public services. The Project's VMT Analysis did not identify significant cumulative traffic impacts with regards to the Project and buildout of future developments. In addition, as analyzed in the Noise and Vibration Impact Study, the Project would not contribute to significant cumulative noise impacts with regards to the Project and buildout of the related projects. In addition, the Project would not result in significant cumulative air quality since the Project's incremental contribution to long-term emissions of non-attainment pollutants and ozone precursors, considered together with cumulative projects, would not be cumulatively considerable. As a result, there is no evidence of significant cumulative impacts from successive projects of the same type in the same place, over time. Therefore, this exception does not apply to the Project.

Criterion Section 15300.2(c): Significant Effect

A categorical exemption shall not be used for an activity where there is a reasonable possibility that the project will have a significant effect on the environment due to unusual circumstances.

This exception applies when there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances. As described above, the Hotel Site would be developed with a 15-story, approximately 310,339 sf (not including balconies or roof decks) luxury hotel with 58,760 sf of parking area. The hotel would be developed with 174 guest rooms and a range of amenities, including 3,255 sf of office space for hotel staff and employees, 6,537 sf of hotel restaurants, 1,310 sf lounge space, 4,000 sf of spa and fitness amenities, and 4,000 sf dedicated to a private club/lounge, similar to other "members-only" clubs such as the Grand Club provided at Hyatt hotels or the Ritz Carlton Club Level provided at Ritz Carlton hotels. The hotel would also include 32,759 sf of landscaped terraces and rooftop space that would feature an outdoor deck, garden, and swimming pool. The hotel also includes 17,058 sf of balcony space accessible through guest rooms from the fourth to fifteenth level. In addition to the hotel, the Project also consists of the construction and operation of a new City-owned water well (Well #8) on the Well Relocation Site.

The Project is consistent with the General Plan Land Use Element designation and Zoning Code designation; consistent with applicable goals, objectives, standards, and policies within the General Plan Land Use Element, Inglewood International Business Park Specific Plan, and Los Angeles County ALUP; and is similar in size and scale to other developments in the area and is not unusual for the location. The Project is located in a developed urban neighborhood, provides commercial uses with convenient access to nearby high-quality public transit options, and is directly surrounded by urban uses in all directions. Based on available facts and reasonable assumptions based on facts, there are no unusual circumstances for the Project that support a reasonable possibility of a significant effect on the environment. Therefore, this exception does not apply to the Project.

Criterion Section 15300.2(d): Scenic Highway

A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

This exception applies to a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state

scenic highway. Based on a review of the California Scenic Highway Mapping System,[25] the Project Site is not located on or near an officially designated scenic highway. The Project would have no impacts on an officially designated scenic highway. Therefore, this exception does not apply to the Project.

Criterion Section 15300.2(e): Hazardous Waste Sites

A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

This exception applies to a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code. Government Code Section 65962.5 refers specifically to a list of hazardous waste facilities compiled by the Department of Toxic Substances Control (DTSC). The DTSC maintains the EnviroStor database, which identifies potentially hazardous sites where cleanup actions, such as a removal action or extensive investigations, are planned or have occurred. The database provides a listing of Federal Superfund sites (National Priorities List), State Response sites, Voluntary Cleanup sites, and School Cleanup sites. The Project Site is not listed on DTSC's EnviroStor database[26] or on the State Water Resources Control Board's GeoTracker database, which provides a list of leaking underground storage tanks.[27] As such, no impacts with regard to listing as a hazardous materials site would occur. In addition, according to the Phase I Environmental Site Assessment prepared for the Project by Odic Environmental (2007) for the Project Site, no recognized environmental concerns or potential off-site sources of environmental concern were identified. Therefore, the exception under CEQA Guidelines Section 15300.2(e) does not apply to this Project.

Criterion Section 15300.2(f): Historical Resources

A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

CEQA Guidelines Section 15300.2 states that a categorical exemption "shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource."

To assess the potential for the Project to result in a substantial adverse change in the significance of a historical resource, a Cultural Resources Assessment Report was prepared in August 2023 (Attachment D). The Project Site currently contains only one structure, the L-shaped 1-story industrial building at 3820 W. 102nd Street. According to the Los Angeles County Assessor's Office, the industrial building was constructed in 1989 and therefore, does not meet the age requirement for historic resources of 45 years of age. No other structures or historical resources were identified on the Project Site and thus, the Project would not have a direct impact on historical resources.

As discussed within the Cultural Resources Assessment Report, three properties were identified as being potentially eligible for listing in the California Register of Historical Resources within 0.5 miles of the Project Site. Of these three properties, only two would have indirect views of the Project Site. Since Project construction and operation would be contained to the Project Site and would not physically affect surrounding properties, the Project would only result in potential impacts to surrounding properties if it resulted in adverse visual changes. Thus, the Project

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25 California Department of Transportation, 2018. California State Scenic Highway System Map, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed August 2022.

26 California Department of Toxic Substances Control (DTSC), 2022. EnviroStor. https://www.envirostor.dtsc.ca.gov/public/. Accessed August 2022.

27 State Water Resources Control Board, 2022. GeoTracker. https://geotracker.waterboards.ca.gov/. Accessed August 2022.

was analyzed to determine if it would result in a substantial adverse visual impact to the integrity of these two properties within the immediate surroundings of the Project Site.

The first property is located approximately 1,370 feet east of the Hotel Site and 760 feet southwest of the Well Site at 3620 W. 102nd Street and contains a 2-story multi-family apartment building. Formerly called the Aku Aku Polynesian, the building was constructed in 1965. The building may be potentially eligible as an example of mid-century themed roadside architecture as applied to a multi-family apartment building in the City. However, separated by distance, setback, vegetation, and other buildings while the potential resource would be indirectly visible from the Project Site, the Project would have no potential adverse indirect impact that would cause any substantial adverse change that would detract from the eligibility of the property as a historic resource, as it would not be directly visible from its facade along W. 102nd Street as viewed from the potential resource, and would not alter the view sheds of 3620 W. 102nd Street.

The second property is located approximately 930 feet southwest of the Hotel Site and 940 feet southwest of the Well site at 3921 and 3947 W. 104th Street. This property contains multiple buildings, including a church and community center, ranging from 1 story to 1 1/2 stories in height. The property was first developed in 1951 with additions being constructed through 1966. Due to the hotel's setback from the church in addition to the single- and multi-family residences between the property and the Hotel Site, the Project would not have a strong presence as visible from the church complex's facade along 104th Street. Furthermore, separated by distance, setback, vegetation, and other buildings, while the potential resource would be indirectly visible from the Project Site, the Project would not impact the potential resource as it would not be directly visible from its facade along W. 104th Street as viewed from the potential resource and would not alter the view sheds of the church complex.

Therefore, the Project would have no direct impact on historical resources, as no historical resources were identified on the Project Site and would have no adverse impacts to offsite potential historical resources because the Project would not cause any substantial adverse changes that would detract from the eligibility of any potential historical resources. Thus, this exception would not apply to the Project.

Summary/Conclusions

A project qualifies for a Class 32 (Infill Development) Categorical Exemption if it is developed on an infill site and meets the five (5) conditions described in this report. Based on the technical analyses above, and consistent with the attached technical reports, the Arya Hotel Project meets the criteria for a Class 32 (Infill Development) Categorical Exemption. Furthermore, none of the exceptions to a Class 32 (Infill Development) Categorical Exemption listed in the CEQA Guidelines Section 15300.2 apply to the Project, as supported by the technical analyses provide above. Therefore, based on the analyses and findings presented in this technical memorandum and in the attached technical reports, the Project qualifies for a Class 32 (Infill Development) Categorical Exemption, and can be found exempt from further review under CEQA.

Attachments

Attachment A – Transportation Impact Analysis

Attachment B – Noise and Vibration Technical Report

Attachment C – Air Quality Technical Report

Attachment D – Cultural Resources Assessment Report