

## 1.0 EXECUTIVE SUMMARY

---

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

### 1.1 SUMMARY OF PUBLIC OUTREACH

#### 1.1.1 Scoping

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

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

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

- Changes to proposed Project from an approximately 1.8-mile long alignment with 5 stations to an approximately 1.6-mile long alignment with 3 stations. The revised alignment follows the same route as the original alignment from Market Street and Florence Avenue to Manchester Boulevard to Prairie Avenue terminating at the intersection of Prairie Avenue and Hardy Street.
- Refinements and modifications to the proposed stations as follows:
  - Modify the proposed Project to reduce the total number of stations from the five stations previously considered to the three stations. The original five station locations were at the following:

- Market Street Station: at the intersection of Market Street and Regent Street on Market Street;
  - Manchester Boulevard Station: between Hillcrest Boulevard and Spruce Avenue on Manchester Avenue adjacent to the proposed Projects maintenance and storage facility (MSF);
  - Forum Station: north of the intersection of Prairie Avenue and Pincay Drive on Prairie Avenue;
  - Hollywood Park Station: between Arbor Vitae Street and Hardy Street on Prairie Avenue adjacent to the City's proposed intermodal transit facility (ITF) located on the southeast corner of Prairie Avenue and E. Arbor Vitae Street; and
  - Century Boulevard Station: at the intersection of Prairie Avenue and Century Boulevard on Prairie Avenue.
- The new locations for the three stations are located at:
    - Market Street/Florence Avenue Station: at an existing commercial plaza on the southeast corner of the intersection of Market Street and Florence Avenue between Market Street and Locust Street;
    - Prairie Avenue/Arbor Vitae Street Station: at the intersection of Prairie Avenue and Pincay Drive; and
    - Prairie Avenue/Hardy Street Station: at the intersection of Prairie Avenue and Hardy Street.
  - A pedestrian bridge linkage has been added to connect the Market Street/Florence Avenue Station with the Metro Crenshaw line on the northside of Florence Avenue.
- Removal of the Intermodal Transit Facility (ITF) as part of the proposed Project; the City is proceeding with the ITF project separately.
  - Reduce the potential number of traction power substations from three to two. One will be co-located with the proposed Project's maintenance and storage facility (MSF facility) and the other will be located on the City's ITF site on Prairie Avenue.

(See **Appendix 2.0.1a: Revised Notice of Preparation (Revised NOP) and 2.0.1b Original NOP; Appendix 2.0.2a Revised Initial Study (IS) and 2.0.2b Original IS; and Appendix 2.0.3 Summary of Comments Received on the NOP and IS Memorandum**).

The City submitted both the Original and Revised NOPs and Initial Studies to the Governor's Office of Planning and Research State Clearinghouse for distribution to State agencies; applicable trustee or responsible federal, State, regional, and local agencies identified for the proposed Project, including adjacent cities and counties; the County of Los Angeles; local Native American tribes; and all interested parties requesting such notice to allow for comment on the IS during the 30-day comment period. The Original and Revised NOP distribution lists indicating the agencies, departments, tribes, and parties that

were mailed certified copies of the Original and Revised NOPs is provided as **Appendix 2.0.1: Notice of Preparation**. In addition, copies of the Original and Revised ISs were made available for review at Inglewood City Hall and the Inglewood Public library, as well as on the City’s website, to give the public the opportunity to comment on the both the Original and Revised ISs during the respective 30-day comment periods.

A robust public outreach effort has been conducted to over a two year period starting in 2018 until the publication of this document in 2020. This effort includes over 35 community and stakeholder outreach meetings with a variety of stakeholders including local Inglewood block clubs, neighborhood watch groups and homeownership associations (HOA) such as the Renaissance HOA, Carlton Square HOA, Briarwood HOA, Regent Street HOA, and the Hyde Park Village HOA. The City also engaged the NCAAP Inglewood Chapter, Inglewood Airport Area Chamber of Commerce, Rotary Club of Inglewood, Inglewood Unified School District, local churches, and community-based nonprofits including the Social Justice Learning Center Institute, Move LA, The Enrichment Center, and the Coalition for Clean Air.

## **1.2 SUMMARY OF THE PROPOSED PROJECT**

### **1.2.1 Project Overview**

The proposed Project will provide a transit connection from downtown Inglewood and the Crenshaw/LAX Metro line to the City’s major activity centers, including the Forum, the Los Angeles Stadium and Entertainment District (LASED) as Hollywood Park, and the Inglewood Basketball and Entertainment Center (IBEC). The transit system will consist of an elevated automated people mover (APM) system that will have dual guideways to allow trains to travel continuously in each direction. Several trains will likely be operating at any time, depending upon ridership needs.

As currently envisioned, the transit system will have three stations including: Market Street/Florence Avenue station, Prairie Avenue/Pincay Drive station, and Prairie Avenue/Hardy Street station. Station design capacity would be established by pedestrian demand volumes under typical peak conditions, in addition to increased demand during special events, service disruptions, and emergency evacuation situations. Stations would provide pedestrian access to the elevated APM from existing sidewalk and pedestrian travel areas adjacent to the station locations. Final station locations and configurations will be determined during the design and procurement process.

Upon approval, the City anticipates to contract with a design/build/finance/operate/maintain (DBFOM) contractor to complete the proposed Project. With the DBFOM approach, the responsibilities for designing, building, financing, operating, and maintaining the Project are bundled together and transferred to private sector partners. More detailed design plans and design specifications would be

drafted and included as part of the procurement process. As part of the procurement and project implementation process, the Public Works Director in consultation with the Economic & Community Development Director will have the authority to review each ITC system project for compliance with all applicable provisions of (i) the ITC Design Guidelines, (ii) the ITC Construction Commitment Program, (iii) all additional technical, aesthetic, and other specifications contained in the procurement document(s) for the applicable ITC system component(s), and (iv) all requirements of the Mitigation Monitoring and Reporting Program that will be included in the ITC Final Environmental Impact Report.

Existing infrastructure along the transit alignment may need to be relocated or reconfigured to accommodate new elevated transit guideway structures and stations. In addition to surface improvements, utility infrastructure under the roadway surface may need to be relocated to accommodate the guideway columns, footings, and other components.

### **1.2.2 Background**

The City of Inglewood is currently undergoing continued transformation into a sports and entertainment destination within the greater Los Angeles region through a number of completed and ongoing projects in the City. The Metro Crenshaw/LAX Line, set to open in 2021, will enhance transit access to the City. The revitalized Forum now hosts some of the largest entertainment acts in the country. The redevelopment of approximately 298 acres at the Los Angeles Sports and Entertainment District at Hollywood Park (LASED) includes new residential, commercial, and recreational uses. At the centerpiece of LASED is the new SoFi Stadium which is home to the Los Angeles Rams and the Los Angeles Chargers.

In 2018, the Los Angeles Clippers of the National Basketball Association (NBA) announced a proposal to relocate the team's headquarters, training facilities, and new arena to the City. In August 2020, the City approved the Inglewood Basketball and Entertainment Center and now the project is moving into implementation. In addition, a new Los Angeles Philharmonic music and cultural campus for the Youth Orchestra Los Angeles (YOLA) designed by architect Frank Gehry, will also be headquartered in Inglewood and is set to open in 2021

As Inglewood is transformed into a major regional activity center, the number of vehicular trips associated with new jobs, retail, entertainment, and residential opportunities is anticipated to increase. Based on historic traffic counts, traffic volumes have been increasing at the rate of 1.5 percent per year, and many key intersections and highway corridors are already experiencing congestion. According to the traffic study for the Hollywood Park Stadium Alternative project performed in 2015, while roughly 85 percent of patrons are anticipated to use privately owned vehicles and 15 percent will rely on transit or charter buses for stadium events and games, these modes will still compete to utilize the same traffic corridors within the City that may be physically constrained or congested. Moreover, the Southern California Association

of Government's (SCAG) *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy* Regional Travel Demand Forecasting Model projects substantial socioeconomic and demographic growth throughout the six-county Southern California region. According to SCAG, population, housing, and employment growth are expected throughout the Cities of Los Angeles, Inglewood, and Culver City; unincorporated areas of Los Angeles County; and portions of the South Bay, consisting of the Cities of El Segundo and Hawthorne, among others. The City is working to manage this growth in a sustainable and responsible way, ensuring that residents, businesses, and visitors have convenient and efficient access to new housing, employment, and destination centers, and important city resources.

The City is building on the progress made by the Los Angeles County Metropolitan Transportation Authority (Metro) to develop the County's regional rail network and to create more transportation options associated with the opening of the Crenshaw/LAX Line. The need exists for Inglewood's existing transportation infrastructure and circulation system to be updated, for capacity to be maintained or enhanced on major arterial streets where possible; for Metro and municipal bus operations and service to be increased, and most importantly, for the Metro Rail system to be directly connected to the City's major housing, employment and activity centers.

To address these critical mobility issues, Inglewood has partnered with Metro to analyze viable transit connection options from the Metro Crenshaw/LAX light rail line to the LASED. With the City's input, in 2017, Metro conducted a study to explore how best to connect Inglewood's future LASED to Metro's rail system via a high-capacity transit connection. The Metro study analyzed (1) an interlined operability connection from the Crenshaw/LAX Line in a subway under Prairie Avenue, which also would jointly operate on a portion of the Crenshaw/LAX Line; and (2) independent operability options for independent services that could provide connections from the Metro Rail system at nearby Metro stations along the Crenshaw/LAX line to the NFL stadium. At the conclusion of the study, the City and Metro agreed that the interlined operability scenario is infeasible due to the cost and complexity that would be created on the Metro Rail system. Now, consistent with Metro's recommendations, Inglewood has analyzed alternatives and developed an independent operability transit proposal to connect the City's activity centers to Metro Rail system.

The City proposes the Inglewood Transit Connector project to increase transit mode split, reduce vehicle trips, improve congestion and circulation, and reduce per-capita vehicle miles traveled to the City's major activity centers, with corresponding improvement in air quality, public health, and reductions in greenhouse gas emissions from transportation sources in accordance with the City's goals under SB 375 and State policy with respect to climate change. When completed, the project would also provide a critical transportation connection during the 2028 Summer Olympic Games as the new SoFi Stadium is slated to host the Opening and Closing Olympic Ceremonies.

On April 21, 2020, the California State Transportation Agency awarded Inglewood a \$95.2 million grant that will go toward the Inglewood Transit Connector Project (ITC Project). Additionally, on March 9, 2020, the South Bay Cities Council of Governments also voted to reallocate \$233 million in Measure R sales tax revenue that had been slated for highway improvements to the ITC Project.

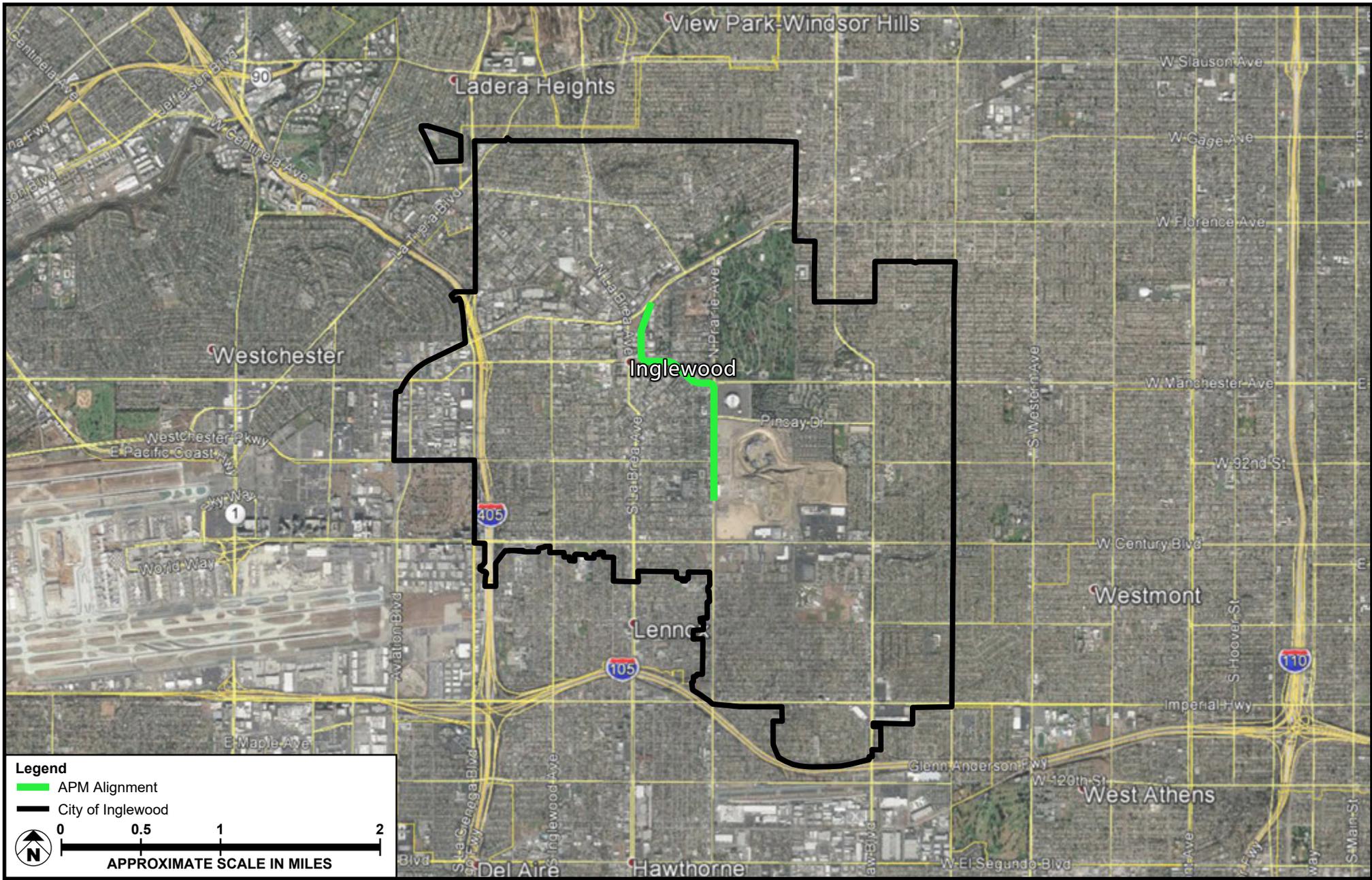
This EIR describes the City's further examination and comparative analysis of alternative transit connection concepts, as well as the Project's delivery and implementation strategies.

### 1.2.3 Project Location

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

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



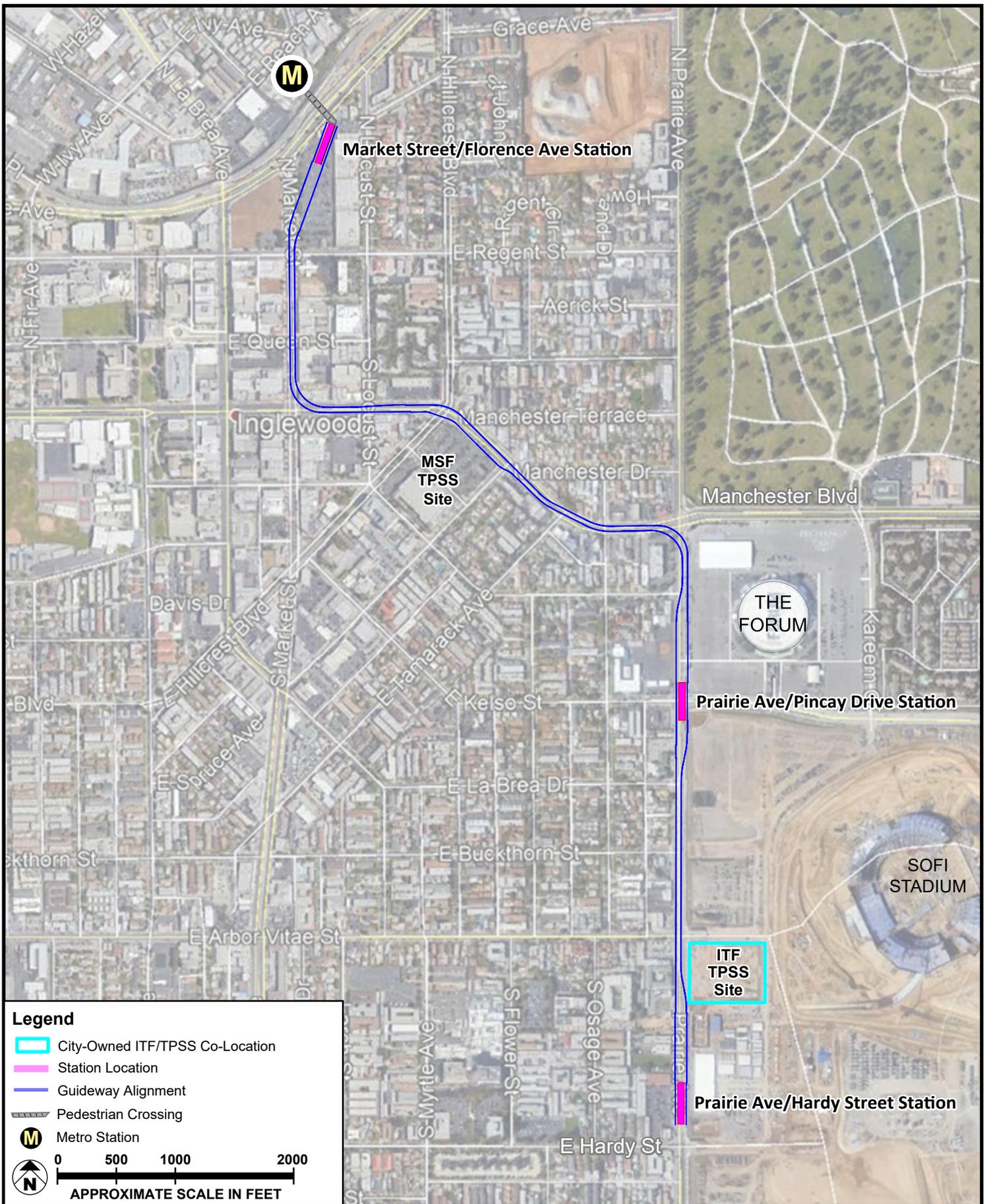


SOURCE: Google Earth - 2020; Meridian Consultants - 2020

FIGURE ES-2



City of Inglewood



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

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

FIGURE ES-3



Project Vicinity Map



SOURCE: City of Inglewood - 2018; Meridian Consultants - 2019

FIGURE ES-4



Location of Alternative Alignments in the LPA Report

## 1.2.4 Project Objectives

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

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

- Provide direct and convenient connection to the Metro regional transit system for local residents and the region to access the City’s new major employment, commercial, and activity centers;
- Provide sufficient transit connection capacity between the Metro regional transit system and the City’s new major activity centers with enhanced travel time certainty and sufficient capacity to meet peak ridership demands to encourage transit as a travel mode choice;
- Maintain existing roadway capacity;
- Reduce the City’s traffic congestion and alleviate growing demand on the existing roadway network on both major arterials and residential streets for both nonevent and event days;
- Encourage intermodal transportation systems by providing convenient, reliable time-certain transit;
- Increase transit mode split, reduce vehicle trips, and reduce per-capita vehicle miles traveled to the City’s major activity centers, with corresponding improvement in air quality, public health, and reductions in greenhouse gas emissions from transportation sources in accordance with the City’s goals under SB 375 and State policy with respect to climate change;
- Support the ongoing economic revitalization, growth opportunities for transit-oriented development (TOD) within the Downtown TOD Plan area, including commercial and residential uses, including through the creation of public parking facilities;
- Encourage redevelopment and investment within the City in areas served by the proposed Project;
- Provide safe, reliable, and convenient access to businesses in the City so that they are accessible to their workforce and customers;
- Connect the Inglewood community and citizens to jobs, education, services, and destinations within the City and within the region by providing transit within safe and accessible walking distances; and
- Support regional efforts to become more efficient, economically strong, equitable, and sustainable.

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

### 1.2.5 Construction Commitment Program

As part of the Project, the City of Inglewood has developed a Construction Commitment Program to proactively address the effects of the construction of the APM project on the community.

To address the effects of the construction activities on traffic conditions, the City will establish a Project Task Force for the ITC Project that would review worksite traffic control plans and other traffic management plans developed by the Project contractor(s) for the Project to ensure these plans address:

- Assessing traffic conditions to determine the need for additional traffic signals, signs, lane restriping, signal modifications, etc.
- Establishing detour routes after assessing the effect on passenger, bicycle and vehicle traffic and businesses
- Maintenance of adequate access for businesses and residents
- Coordination of any temporary street closures and restricted access with all special events
- Notification of the public through signs and web-based media
- Coordination with residential and commercial neighbors on scheduled construction activities
- Working with City of Inglewood and LA County police and fire personnel regarding maintenance of emergency access and response times
- Monitoring and coordination of deliveries

All haul routes and activities will need to be reviewed and approved with truck deliveries of bulk materials and hauling of soil scheduled during off-peak hours to the extent feasible and on designated routes including freeways and nonresidential streets.

Parking, staging, or queuing of Project-related vehicles, including workers' vehicles, trucks, and heavy vehicles, shall be prohibited on City streets at all times except in defined workspace areas defined in an approved Worksite Traffic Control Plan. Construction Staging or Worksite Traffic Control Plans will also be required to include a parking management plan to ensure on-street and other publicly available parking remains available.

Construction noise reduction measures in this Program require the use of construction equipment that generates the least amount of noise, use of temporary noise barriers, and restrictions on the use of heavy equipment that create vibration near sensitive uses and buildings. Contact information for a Community Affairs Liaison will be posted throughout the construction area. This liaison shall respond to any noise complaints within 24 hours.

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

To ensure that any hazardous materials encountered during construction are appropriately addressed, building demolition, hazardous materials contingency, soils management, and health and safety plans will be prepared and implemented during construction.

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

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

The Construction Commitment Program also includes business and community support programs, including advertising support for businesses, advance notice of construction activities that may affect businesses or the community, and access to a Project Public Liaison to address any concerns related to construction. These programs will include:

- Business outreach and support programs for the purpose of assisting those businesses financially affected by the construction;
- Planning and scheduling construction activities to minimize effects on community gatherings, special celebrations, or other similar events;
- Public information campaigns conducted to encourage patronage of businesses during the construction period; and
- Implementation of educational safety awareness program at schools adjacent to construction activity along the proposed Project to provide information to students and parents.

### **1.2.5 Project Characteristics**

The proposed Project includes the following components:

- An APM train operating on an elevated dual lane guideway with three stations;
- Passenger walkway systems connecting the stations to the street, mezzanine areas, escalators and elevators, storage areas, communications systems, and signage, among other features;
- An MSF to provide regular and preventive maintenance of the APM trains and equipment, as well as space for storage of the vehicle fleet and the operations control center, among other functions;

- TPSSs located at the MSF site and the City’s Civic Center site on Prairie Avenue to provide power for the proposed Project including traction/propulsion, auxiliary and housekeeping power;
- Utility infrastructure—new, modified and/or relocated—to support the proposed Project;
- Roadway and streetscape modifications and improvements to accommodate the guideway alignment and support structures; and
- Surface public parking lots located at the Market Street/Florence Avenue Station, which will also contain multimodal pick-up and drop-off areas, 150 S. Market Street, and the MSF site to support use of the ITC Project and Downtown Inglewood; and
- Land acquisitions, acquisitions of air rights, easements and encroachment rights, subdivision of parcels, and/or other reconfigurations of parcels, dedications, vacations and/or temporary closures of public rights-of-way, as necessary. The City will contract with a design/build/finance/operate/maintain (DBFOM) contractor to complete the proposed Project. With the DBFOM approach, the responsibilities for designing, building, financing, operating, and maintaining the Project are bundled together and transferred to private sector partners. In this structure, the City will enter into an agreement with a private sector party to finalize the design, build, operate, and maintain the APM system.

### 1.3 SUMMARY OF ENVIRONMENTAL IMPACTS

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

Impacts related to Agricultural and Forestry Resources, Hydrology and Water Quality, Mineral Resources, Public Services, Recreation, and the Initial Study Mandatory Findings of Significance were determined to be less than significant in the Revised Initial Study. These environmental topics are not evaluated further in this Draft EIR.

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

### 1.3.1 Aesthetics

#### ***Existing Conditions***

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

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

Additionally, the Project area is not near any designated wild or scenic rivers pursuant to the National Wild and Scenic Rivers System.<sup>4</sup> The nearest mountains, the Santa Monica Mountains, are more than 10 miles north of the Project boundary. No views of these mountains or of any other focal points or broad panoramic view corridors are available from public rights-of-way along the proposed alignment.

#### ***Visual Impacts***

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

---

1 Google Earth, 2020.

2 City of Inglewood *General Plan*, "Conservation Element" (1997), 1.

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

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

and operation would be less than significant with the incorporation of various measures and compliance with the ITC Design Guidelines.

The design of the APM guideway would generally allow the continued expression of the buildings identified as historic resources along Market Street in Downtown Inglewood. While the Project would not result in significant impacts to the overall visual character of Downtown Inglewood along Market Street, the guideway would obstruct views of the former Fox Theater building, identified as a historic resource due the architectural design of the building. Mitigation measures and project design features included in the ITC Design Guidelines would reduce this impact to the extent feasible, however, this indirect impact on the visual character of this building would be a significant and unavoidable impact of the Project.

Visual impacts associated with construction of the proposed Project would be less than significant with the implementation of various measures included in the ITC Construction Commitment Program or identified as mitigation measures. The construction activities would also be phased to limit the exposure of one segment from continual exposure to construction activities and unpleasant views. Construction activities on each segment, and overall, would be temporary in nature and visual impacts would be alleviated once the construction is completed.

Additionally, the proposed Project would be generally consistent with the existing zoning and planning regulations governing scenic quality. The proposed Project would be designed to be complementary with the visual character defined in the City's Downtown TOD Plan and the Hollywood Park Specific Plan for areas located adjacent to the proposed alignment to the extent feasible. An amendment to General Plan Policy 2.3, Preservation of Historic Fabric, is proposed as part of the Project to recognize the incorporation of the proposed Project into Market Street in Downtown Inglewood. This amendment would be consistent with the goals of the General Plan.

### **1.3.2 Air Quality**

#### ***Emissions Thresholds***

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

Construction of the proposed Project has the potential to temporarily emit air pollutants through the use of heavy-duty construction equipment, through vehicle trips generated from workers and haul trucks

traveling to and from the Project Site, from demolition and various soil-handling activities, and from the use of diesel powered on-and off-road vehicles and equipment. In addition, fugitive dust emissions would result. Because of the size and number of overlapping construction activities, even with implementation of mitigation measures, such as use of off-road diesel-powered construction equipment that meets or exceeds Tier 4 Final off-road emissions standards or equivalent for all equipment rated at 50 horsepower or greater, dust control measures, and maximizing the use of electric-powered construction equipment, construction-related daily emissions would exceed the SCAQMD significance threshold for NO<sub>x</sub>.

### ***Exposure to Pollutants***

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

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

### **1.3.3 Biological Resources**

The proposed Project is located within a highly developed and urbanized area and potential biological resources are limited to a few small parks. Sensitive animal and plant species and vegetation communities identified in the California Natural Diversity Database as having the potential to occur within a 0.25 mile radius of either side of the proposed Project guideway, stations, and support facility sites are largely absent. Biological resources that would be affected by development of the proposed Project are limited to trees located along the Project alignment and within the property proposed for acquisition as part of the Project. None of the trees potentially affected are native or considered to be rare, endangered, or sensitive species, but 541 are protected under the City of Inglewood Tree Protection Ordinance (Inglewood Municipal Code Chapter 12, Article 32), and these or others could serve as nesting habitat for migratory or other protected bird species. The removal of these trees could create impacts, especially if the trees are removed during the bird nesting season. These impacts would be mitigated to a less-than-significant level through the conduct of preconstruction surveys prior to any nesting season tree removal, protection of trees with active nest sites during construction, through obtaining necessary City permits to remove existing trees, and through protection or replacement of removed trees at a 1:1 ratio minimum as

determined by the City. All trees removed to accommodate the Project will be replaced in accordance with the City's Tree Protection Ordinance and additional standards in the ITC Construction Commitment Program. No permanent impacts to trees located along the alignment would, therefore, result from the Project.

### 1.3.4 Cultural Resources

#### ***Historic Resources Impacts***

The Project Site is located in a part of Inglewood known to contain historic-age buildings, which include eleven identified historical resources.<sup>5</sup> Of these historical resources, the proposed APM guideway would result in significant impact to two of these resources: the former Fox Theater at 115 Market Street and the former People's Federal Building & Loan Association building located at 150 Market Street. The APM guideway would be located directly in front of the former Fox Theater building and would visually obscure a portion of the sign pylon, creating a visual separation between the uppermost portion of the pylon and the lower portion of the building containing the theater marquee and public entrance. The APM guideway would also block views of the primary façade of the building, making it difficult to appreciate the overall design of the building. Because the ability of the former Fox Theater to convey its historic significance would be impaired following the implementation of the proposed Project, the indirect impact on the former Fox Theater is identified as a significant impact of the Project that cannot be avoided.

As the guideway turns east on Manchester Boulevard, it would partially intrude into the former People's Federal Building & Loan Association building located at 150 S. Market Street. The intrusion is necessary to accommodate for the turning radius of the guideway at this location. Acquisition and demolition of this building is proposed to accommodate the guideway. Demolition of this building is identified as a significant impact of the Project that cannot be avoided.

#### ***Archaeological Resources Impacts***

The cultural resource records search and field visit conducted did not result in identifying any prehistoric or historical archaeological resources within the Project study area.<sup>6</sup> Further, the built nature of the area indicates a high degree of disturbance suggesting the likelihood of encountering intact archaeological deposits near the surface of the Project area to be very low. Implementation of mitigations would reduce the potential impacts to archaeological resources to a less than significant level.

---

5 Historical Resources Technical Report. Inglewood Transit Connector. November 19, 2020.

6 See **Appendix 4.4.1** of this Draft EIR.

## ***Human Remains***

Implementation of mitigations would reduce the potential impacts to human remains to a less than significant level.

### **1.3.5 Energy Resources**

Operation of the proposed Project would reduce annual VMTs under all scenarios and would therefore reduce annual petroleum consumption. Specifically, under the Adjusted Baseline scenario, the proposed Project would reduce annual fuel consumption from 49,373,645 gallons to 49,049,088 gallons, a decrease of 324,557 gallons. Under the Future (2026) Non-Event scenario, the proposed Project would reduce annual fuel consumption from 46,722,216 gallons to 46,341,084 gallons, a decrease of 381,133 gallons. Under the Future (2026) All Event scenario, the proposed Project would reduce annual fuel consumption from 50,499,092 gallons to 49,377,161 gallons, a decrease of 1,121,931. Under the Future (2045) Non-Event scenario, the proposed Project would reduce annual fuel consumption from 41,714,897 gallons to 41,353,725 gallons, a decrease of 361,172 gallons. Under the Future (2045) All Event scenario, the proposed Project would reduce annual fuel consumption from 44,782,905 gallons to 43,660,847 gallons, a decrease of 1,122,058 gallons.

During construction, the proposed Project would generate a demand for 172,177 kWh of electricity and up to 568,815,635 gallons of petroleum each year. Electricity for operation of the proposed APM system would be provided via two traction power substations (MSF TPSS and TPSS at the City's Civic Center site on Prairie Avenue). The electricity demand for the proposed Project during normal operation would be 22,003,403 kWh (22.0 GWh) per year.

Because the proposed Project would support statewide efforts to improve transportation efficiency, comply with the CALGreen building code, and comply with other State and local plans and policies, the energy consumption from the proposed Project would not be wasteful, inefficient, or unnecessary, and would impacts would be less than significant.

### **1.3.6 Geology and Soils**

The proposed Project would be constructed consistent with the requirements of the California Building Code. The Project study area is in a relatively level area with soils made up of artificial fill overlying native alluvial and older alluvial deposits, liquefaction zone area, or within areas designated as having the potential for seismically induced landslides and is not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed Project. The Project alignment is located in an area that contains potentially active faults, including the Townsite, Centinela Creek, Cemetery Fault, and Manchester Faults. The Townsite fault may intersect the Project alignment, stations, and near the MSF.

Although the Townsite, Centinela Creek, Cemetery, and Manchester faults are not presently mapped as Alquist-Priolo Earthquake Zoning Act (APEFZ) faults, or situated within a delineated APEFZ, their location within the active Newport-Inglewood fault zone and proximity to the Project alignment suggests these faults should be considered active with the potential for fault rupture and impacts would be potentially significant. Designing the Project in conformance with the 2019 CBC<sup>7</sup>, Caltrans guidance, and applicable seismic design criteria identified in mitigation measures would reduce potential impacts to less than significant.

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

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

### **1.3.7 Greenhouse Gas Emissions**

By providing a new transit option in the City, the proposed Project will reduce VMTs and GHG emissions generated by vehicular travel. Specifically, annual MTCO<sub>2</sub>e would be reduced by 2,831 MTCO<sub>2</sub>e when compared to the Adjusted Baseline without proposed Project, 9,809 MTCO<sub>2</sub>e when compared to the 2026 opening year without proposed Project, and 9,778 MTCO<sub>2</sub>e when compared to the 2045 future year without proposed Project. The proposed Project would be consistent with State and local plans and policies to achieve Statewide goals for GHG reduction, including Governor's Executive Order S-3-05, the California Air Resources Board 2017 Scoping Plan, SCAG's 2020 RTP/SCS, and the City's Energy and Climate Action Plan.

---

<sup>7</sup> 2019 California Building Standards Code (Cal. Code Regs., Title 24) published July 1, 2019.

Construction of the Project is estimated to generate approximately 14,348 metric tons of CO<sub>2</sub>e greenhouse gas (GHG) emissions. Given the five-year construction period, the annual construction GHG emissions for the proposed Project would be 2,870 metric tons of CO<sub>2</sub>e. Operational emissions were estimated for the anticipated start of operations in late 2026 and a milestone year of 2045. Due to advances in technology and regulations to reduce GHG emissions operational emissions would continue to decline by 2056, and thereafter. The normal operation of the proposed Project would generate 7,742 MTCO<sub>2</sub>e per year from the operation of the MSF, stations, and other facilities. Each TPSS will be equipped with backup power generators which are estimated to generate 311 MTCO<sub>2</sub>e per year, bringing the total GHG emissions from operations to 8,053 MTCO<sub>2</sub>e per year.

### **1.3.8 Hazards and Hazardous Materials**

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

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

Soil sampling confirms the potential for encountering contaminants of concern that could result in adverse health effects if not handled appropriately during construction. In addition, structures within the APM guideway footprint that would be demolished prior to construction of the proposed Project could contain hazardous building materials that would require appropriate identification, handling, and disposal. The potential exposure of construction workers or nearby residents and workers to these existing hazards would be reduced to a less than significant level through compliance with existing State and federal laws and regulations, and through implementation of plans addressing the handling of any hazardous materials encountered during construction that would be developed as part of the ITC Construction Commitment Program prior to the start of construction.

### 1.3.9 Land Use and Planning

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

The proposed Project includes amendments to the City's General Plan and the proposed adoption of the Transportation Corridor Overlay Zone to reflect the integration of the ITC Project into the City's circulation system. The proposed General Plan Amendment and Transit Overlay Corridor Zone are consistent with the overall goals of the City's General Plan. The proposed Project is also consistent with the goals of transportation planning in the SCAG 2020-2045 Regional Transportation Plan/Sustainable Community Plan as the Project will reduce VMT in the City and region. The proposed Project would not conflict with goals, objectives, or policies adopted for the purpose of mitigating environmental impacts.

### 1.3.10 Noise and Vibration

#### *Operational Noise*

The ITC Project is designed to meet the City's goals and objectives related to reducing the City's traffic congestion and alleviate growing demand on the existing roadway network by encouraging and providing the use of intermodal transportation systems. The proposed Project is intended to reduce vehicle trips and roadway noise levels. Under all operational scenarios, the roadway conditions with implementation of the proposed Project would not exceed the threshold of significance of an increase in noise level of 3 dBA Leq to or within the "normally unacceptable" or "clearly unacceptable" land use compatibility categories or result in an increase of 5 dBA or greater at the sensitive land use when it would exceed 65 dBA DNL or CNEL.

The proposed Project would either utilize large, automated monorail technologies or rubber-tire vehicles operating along a fixed guideway. When compared to ambient conditions, daytime noise level increases from the rubber-tired APM trains would result in a maximum of 0.2 dBA Leq (Lday). Additionally, nighttime noise levels increase would result in a maximum of 0.8 dBA Leq (Lnight). When compared to ambient conditions, daytime noise level increases from the monorail technology would result in a maximum of 0.7 dBA Leq (Lday). Additionally, nighttime noise levels increase would result in a maximum of 1.9 dBA Leq

(Lnight). As such, operational noise levels would not result in increases of 3 dBA to or within the “normally unacceptable” or “clearly unacceptable” compatibility category for land uses.

Anticipated noise levels from stationary sources from the proposed MSF would range from no increase to a high of 4.4 dBA. Considering the ambient environment, exterior noise levels during the nighttime period at Site I would be 62.9 dBA Leq (Lnight). Although nighttime noise levels would increase by more than 3 dBA, nighttime noise levels would not result in an exterior environment that exceeds the “normally unacceptable” or “clearly unacceptable” land use compatibility categories. Operation of the two TPSS sites would result in a maximum increase of 0.1 dBA Leq, which is technically considered not perceivable. With the concurrent operation of noise generated from the MSF, the noise levels generated by the transformers would be negligible. The anticipated noise increase from operation of the stations would not result in an increase in noise level of 3 dBA to or within the “normally unacceptable” or “clearly unacceptable” land use compatibility categories. Noise impacts from operation of the proposed Project would be less than significant.

### **Construction Noise**

Construction noise levels were calculated for each phase of construction (Phases 1 through 4) at the location of noise sensitive uses. During Phase 1, construction noise level increases over the significance threshold during the daytime period would result in a maximum of 14.5 dBA Leq1-hour. Additionally, construction noise level increases over the significance threshold during the nighttime period would result in a maximum of 18.8 dBA Leq1-hour.

During Phase 2, construction noise level increases over the significance threshold during the daytime period would result in a maximum of 8.1 dBA Leq1-hour. Additionally, construction noise level increases over the significance threshold during the nighttime would result in maximum of 14.4 dBA Leq1-hour.

During Phase 3, construction noise level increases over the significance threshold during the daytime would result in a maximum of 20.5 dBA Leq1-hour. Additionally, construction noise level increases over the significance threshold during the nighttime would result in a maximum of 23.8 dBA Leq-1hour.

During Phase 4, construction noise level increases over the significance threshold during the daytime would result in a maximum of 8.3 dBA Leq-1hour. Additionally, construction noise level increases over the significance threshold during the nighttime would result in a maximum of 11.1 dBA Leq-1hour.

A variety of heavy trucks will travel to and from the proposed Project during various phases of construction. As compared to adjusted baseline average daily traffic volumes along West Century Boulevard, Manchester Boulevard, and South Prairie Avenue, the sound power generated by the maximum

anticipated number of construction trucks would not be equivalent or greater to a doubling of both the minimum and maximum average daily traffic (ADT) along West Century Boulevard, Manchester Boulevard or South Prairie Avenue and therefore would not result in a 5 dBA increase along those roadways.

In order to mitigate the proposed Project daytime and nighttime construction noise and heavy-duty construction vehicle noise, the ITC Construction Commitment Program identifies measures to reduce construction noise levels, including, but would not be limited to, installing temporary noise barriers that block line-of-sight to noise sensitive uses, reducing the simultaneous use of heavy-duty construction equipment, enclosing stationary noise sources with acoustical barriers where possible, using hydraulic or electric impact tools with external noise jackets, use of quiet pile driving technology, and designation of a Community Affairs Liaison responsible for responding to local complaints about construction. This mitigation program would include feasible measures to reduce construction impacts to less than significant.

### ***Vibration***

Estimated vibration levels from construction activities would exceed the building damage significance threshold of 0.2 PPV inches per second (ips), and the human annoyance significance threshold of 72 PPV ips at several locations in the vicinity of the proposed Project. In addition, construction delivery/haul trucks would generate ground-borne vibration as they travel along the proposed Project's anticipated off-site truck travel routes. However, off-site truck travel would not exceed the building damage significance threshold of 0.2 PPV inches per second (ips), and the human annoyance significance threshold of 72 PPV ips.

In order to mitigate these vibration impacts, a Construction Noise Control Plan will be prepared prior to the start of construction that could include, but would not be limited to, identifying and recording existing conditions of buildings and structures that could be damaged from construction activities, implementing a Vibration Plan during demolition and construction, and limiting the location of heavy equipment activity near sensitive receptors. This mitigation program will include feasible measures to reduce construction vibration levels, and impacts would be less than significant.

The estimated ground-borne vibration levels would be approximately 67 VdB for monorail trains (rapid transit or light rail vehicles) and 64 VdB for rubber-tired APM trains. Consequently, the maximum vibration level of the uses along the guideway would be below the FTA recommended maximum acceptable level threshold of 72 VdB and impacts from operation of the Project would be less than significant.

### 1.3.11 Transportation and Circulation

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

#### ***Operational Impact Analysis***

The analysis summarizes the average daily traffic (ADT), ITC ridership, and vehicle miles travelled (VMT), estimates for the following scenarios: Adjusted Baseline Conditions Non-Event Weekdays without Project; Adjusted Baseline Conditions Non-Event Weekdays with Project; Future Opening Year (2026) Conditions with Event without Project; Future Opening Year (2026) Conditions with Event with Project; Future Horizon Year (2045) Conditions with Event without Project; and Future Horizon Year (2045) Conditions with Event with Project.

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

Compared to the Future Opening Year (2026) with Event without Project scenario, the daily traffic volumes under the Future Opening Year (2026) with Event with Project scenario would decrease daily traffic volumes between approximately 920 to 1,410 vehicle trips per day along Prairie Avenue between Manchester Boulevard and Century Boulevard; approximately 430 to 757 vehicle trips per day along Manchester Boulevard between La Brea Avenue and Crenshaw Boulevard; and approximately 1,078 to 1,170 vehicle trips per day along Century Boulevard between La Brea Avenue and Crenshaw Boulevard. Additionally, the estimated non-event daily ridership under Future Opening Year (2026) conditions is 3,098 daily pedestrians. The Future Opening Year (2026) with Event conditions includes a sold-out NFL football game at the SoFi Stadium. The estimated daily ridership under Future Opening Year (2026) with Event (NFL) conditions is 25,056 daily pedestrians.

The daily traffic volumes under the Future Horizon Year (2045) with Event and Project scenario would decrease between approximately 1,085 to 1,725 vehicles per day along Prairie Avenue between Manchester Boulevard and Century Boulevard; approximately 575 to 985 vehicles per day along

Manchester Boulevard between La Brea Avenue and Crenshaw Boulevard; and approximately 1,335 to 1,400 vehicles per day along Century Boulevard between La Brea Avenue and Crenshaw Boulevard when compared to the Future Horizon Year (2045) with Event without Project scenario. The ITC ridership analysis for the Future Horizon Year (2045) with Event with Project estimated the non-event daily ridership to be 4,405 daily pedestrians. The Future Horizon Year (2045) with NFL Game Event conditions includes a sold-out event with 70,240 attendees and 6,000 employees on a weekday at the Sofi Stadium. The daily ridership under Future Horizon Year (2045) with NFL Game Event with Project scenario is estimated at approximately 31,089 daily pedestrians.

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

CEQA Guidelines section 15064.3 establishes that vehicle miles traveled (VMT) is generally the most appropriate measure of transportation impacts. Compared to the Adjusted Baseline Conditions Non-Event Weekdays without Project, the annual VMT in the City of Inglewood would be reduced by approximately 6.56 million vehicle-miles under the Adjusted Baseline with Project Conditions Non-Event Daily VMT scenario. The weekday daily VMT would be reduced by approximately 227,739 vehicle-miles (4.3%) with the implementation of the proposed Project under Future Opening Year (2026) with Event conditions in comparison to the Future Opening Year (2026) Conditions with Event without Project. The weekday VMT under the Future Horizon Year (2045) with Project with Event scenario would be reduced by approximately 297,080 vehicle-miles (5.2%) from the Future Horizon Year (2045) Conditions with Event without Project. As such, the proposed Project would result in a reduction of VMT under all scenarios and would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Therefore, impacts during operation related to VMT would be less than significant.

The proposed Project would connect the rest of the regional mass-transit system to and from major housing, employment and activity centers and adjacent uses in the City of Inglewood. The proposed Project is a 1.6-mile, dual lane, elevated mass-transit system with three stations. The proposed Project would accommodate all users, including pedestrians, bicyclists, drivers, transit users, and those operating emergency vehicles. The proposed Project would also include pedestrian access improvements, including mezzanine level at each station to provide connectivity to pedestrian bridges for traveling over active roadways. The pedestrian bridges will be designed to improve both pedestrian access and comfort between the stations and the street level, in addition to providing multimodal access to adjacent bus facilities, pick-up and drop-off areas, and other adjacent resources. The proposed Project will also upgrade

the existing sidewalks to ensure consistent ADA appliance along the transit corridor. The proposed Project would provide for the City to maintain streetscape consistent with the requirements of the Municipal Code. Accordingly, the proposed Project would not create or substantially increase safety hazards due to a design feature or incompatible uses.

### **Construction Impact Analysis**

An estimate of the proposed manpower workforce, on-road on-site equipment (trucks) and on-road off-site equipment (trucks) for each phase of construction. Approximately 682 daily trips are associated with Phase 1 construction, approximately 572 daily trips are associated with Phase 2 construction, approximately 604 daily trips are associated with Phase 3 construction and approximately 200 daily trips are associated with Phase 4 construction. The total trips include both the construction worker and truck trips broken down by each phase. Construction of the APM guideway, columns and station components that could affect Prairie Avenue and Manchester Boulevard would involve construction-related traffic occurring during the off-peak hours and night hours in order to minimize effects to daily commuter traffic and potential event traffic. Delivery of construction materials could occur during the night shift. Construction activities during the day shift would primarily consist of work that could proceed without substantial disruption to daily commuter traffic and potential event traffic along Prairie Avenue and Manchester Boulevard. Additionally, some minor activity could potentially occur during periods in between construction shifts for logistics, moving equipment, etc.

The ITC Project Construction Commitment Program includes a Construction Staging and Traffic Control Program to ensure access and circulation remains adequate for all uses along the Project alignment during construction. Implementation of this program would ensure adequate circulation and access for all uses located along the proposed alignment of the APM system, including access to businesses at all times, and transportation related inconveniences would be reduced to the extent feasible. Bus stop relocation and bicycle/pedestrian detours facilitates access by other modes of transportation and ensures continued operation and connectivity to nearby communities. While access to some uses would be disrupted and detoured for short periods of time during construction, through implementation of the Worksite Traffic Control Plans, and adequate access and circulation would continue to be available at all times during construction of the Project. Additionally, construction of the proposed Project, particularly during Phases 2 and 3, would have the potential to result in temporary impacts on access and circulation. The Construction Commitment Program, which includes Worksite Traffic Control Plans and traffic management plans to ensure access and circulation remains adequate for all uses along the Project alignment during construction. Thus, the proposed Project would result in less than significant transportation and circulation impacts during construction.

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

The proposed Project includes a proposed amendment to the Circulation Element of the City's General Plan to reflect the integration of the proposed APM system into the City's circulation system. With the proposed amendments, the proposed Project would be consistent with the Circulation Element. The proposed Project is consistent with the Land Use Element goals by increasing existing capacity and providing additional access to public transportation within the City and the region by adding a transit system to connect visitors and residents with Downtown Inglewood and activity centers in the City to the regional light rail system. As such, the proposed Project would not conflict with Inglewood General Plan policies related to transportation.

### **1.3.12 Tribal Cultural Resources**

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

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

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

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

### 1.3.13 Utilities and Service Systems

#### ***Operation***

Existing water and sewer lines are located within the footprint of the proposed Project along Market Street, Manchester Boulevard, and Prairie Avenue. Project components including the MSF and stations would connect to these existing water and sewer lines. The proposed Project stations and MSF would use approximately 8.5 afy less water than the existing uses located on the sites proposed for these facilities.

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

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

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

#### ***Relocation or Construction of Utilities***

There are several major utility lines identified within the Market Street segment of the proposed Project including water, sewer, stormwater, and electrical lines. Additionally, utility lines identified within the Manchester Boulevard segment of the alignment include water, sewer, wastewater, stormwater, and gas lines. Utility lines within the Prairie Avenue segment of the alignment include water, sewer, wastewater, stormwater, electrical, and gas lines. Based upon preliminary review, it appears that all utilities within these segments can be avoided and no major utilities will require relocation. However, the location of utilities is based on a review of existing documentation and the exact locations have not been field verified. Additionally, several storm drains have been identified along these segments which may require relocation due to column placement. In addition, SCE has determined that the proposed Project would likely utilize the existing 16 kva circuit located within the right-of-way of Market Street to provide power for the proposed. SCE has also noted that utilization of this existing circuit would require infrastructure upgrades to accommodate the proposed Project.

Because the locations of utilities identified based on review of existing documentation may not be accurate, utility lines could occur within areas that require excavation for foundations or drilling for columns. Construction could require the potential relocation of utility lines to accommodate the support structure foundations or columns.

## 1.4 ALTERNATIVES

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

As described in **Section 5: Alternatives** of this Draft EIR, a range of alternatives to the proposed Project were considered, with some alternatives initially considered determined to be not feasible. A summary of the alternatives evaluation is presented below.

### 1.4.1. Alternative 1: No Project

The No Project Alternative considers conditions if the proposed Project is not built. No new transportation infrastructure would be built within the Project study area, aside from transportation projects that are currently under construction or funded for construction and operation by 2026. These projects include transit projects funded by Measure R, Measure M, and specified in the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Existing infrastructure and future planned and funded projects assumed under the No Project alternative include:

- Metro Crenshaw/LAX Line –Currently under construction (2020), operating start date (Fall 2021)
- Implementation of the Citywide Event Transportation Management and Operations Plan
- Street improvements being constructed as part of the Los Angeles International Airport Landside Access Modernization Program and the Inglewood Basketball and Entertainment Center (IBEC) projects.
- Existing Bus Service – Metro Rapid and Metro Local

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

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

roadways served by the uniquely-branded buses along routes with a minimum length of approximately 1.5 to 2 miles.

Under this alternative, the City would construct and operate a BRT system that would connect the Forum, the SoFi Stadium, the Performance Arena, the IBEC and the Hollywood Park mixed uses to the Crenshaw/LAX Line Downtown Inglewood station. The proposed route of this alternative would be a loop route starting along Florence Avenue to travel east to North Prairie Avenue where it would turn south along Prairie Avenue to the Inglewood Transit Center Facility at Prairie Avenue and Arbor Vitae adjacent to the Hollywood Park site, and then return via Prairie Avenue northbound to travel westbound along Manchester Boulevard to Market Street to traverse northbound to Florence Avenue. The BRT would be located entirely within the public right-of-way. This route is generally consistent with the route as described in the City's New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines.<sup>8</sup>

### 1.4.3 Alternative 3: Market Street Pedestrian Promenade

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

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

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

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

---

<sup>8</sup> City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, November 1, 2016

bridges to vertical circulation elements to provide access to the sidewalk (at level 1) on the north side of Manchester Boulevard. Providing this additional station in Downtown would:

1. Support ongoing economic revitalization in Downtown Inglewood;
2. Provide a direct connection from Downtown Inglewood to the regional rail system, the Forum, the LASED, including SoFi Stadium, and the IBEC; and
3. Enhance the connection of Inglewood and residents to jobs, education, services, and destinations within the City and within the region; and support regional efforts to become more efficient, economically strong, equitable, and sustainable.

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

The proposed Project modifies and relocates Prairie Avenue to the east to maintain the current roadway capacity. The relocation of Prairie Avenue and the need for a passenger station connection on the sidewalk/ground level affects properties located east of Prairie Avenue. This Alternative avoids affecting these properties by consolidating the two proposed stations on Prairie Avenue into a single station that would be located adjacent to the City's Intermodal Transit Facility at the City's Civic Center site. Passengers would connect to the ground/sidewalk level within the City-owned Civic Center site. **Figure 5.0-4: Alternative 5: Prairie Avenue Single Station Alternative** illustrates this alternative.

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

### **1.4.6 Environmental Superior Alternative**

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

Of the alternatives evaluated in this EIR, the Environmentally Superior Alternative would be Alternative 2, Bus Rapid Transit (BRT) System Alternative. This alternative would avoid the unavoidable significant aesthetic and cultural resource impacts that would result from the Project on the Market Street segment. The BRT System Alternative would, however, not meet the City's basic objectives for the proposed Project.

Under the BRT System Alternative, the proposed Project would not be constructed. No demolition or construction activities would occur, except along the public right-of-way where BRT-only lanes along the route are implemented. The BRT System Alternative would avoid all significant construction related effects and impacts identified for the proposed Project. Unlike the No Project Alternative, the BRT System Alternative would meet some of the City's objectives including providing a direct and convenient connection to the Metro regional transit system, encouraging intermodal transportation systems by providing convenient transit, and providing safe, reliable, and convenient access to businesses in the City. The BRT System Alternative would also meet the City's objectives to support the ongoing economic revitalization, growth opportunities within the Downtown TOD Plan area, and encourage redevelopment and investment within the City in areas served by the proposed Project. However, the objective related to providing sufficient transit connection capacity between Metro's regional transit system and the City's new major activity centers would not be met by this BRT alternative, resulting in limited increased transit mode split, limited reduction in vehicle trips, and consequently, limited reduction in per-capita vehicle miles traveled to the City's major activity centers. The estimated daily BRT ridership with Event Conditions would be approximately 20 percent of the projected ridership for the proposed APM system, providing transit options, increasing transit mode split, reducing vehicle trips, and reducing per capita vehicle miles traveled to the City's major activity centers. Additionally, the BRT System Alternative would not meet the City's objectives to maintain existing roadway capacity, reduce the City's traffic congestion and alleviate growing demand on the existing roadway network on both major arterials and residential streets for both nonevent and event days.

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

The State CEQA Guidelines<sup>9</sup> require that a Draft EIR summary identify areas of controversy known to the lead agency, including issues raised by other agencies and the public. In addition to those areas identified in the NOP as potentially significant, some issues of concern were expressed at a public scoping meeting for the draft EIR and through responses to the NOP.

The primary environmental concerns associated with the Inglewood Transit Connector Project and potential future related development that were raised are summarized below. The NOP and Recirculated NOP comments are included in **Appendix 2.0.3: Summary of Comments Received on the Revised and Original NOP and IS Memorandum** of this EIR. These issues have been incorporated into the environmental analysis of the proposed Project contained within **Section 4.0: Environmental Impact Analysis** of this draft EIR.

---

9 California Public Resources Code, tit. 14, Div. 6, ch. 3, State CEQA Guidelines, sec. 15123.

A summary of the issues identified in these comments is provided below.

### ***Alignment and Operation***

The Original NOP identified a potential option for the Maintenance and Storage Facility at Kelso School. Representatives of the Inglewood Unified School District (Inglewood USD) raised issues regarding the proposed Project's support facilities and stated that any acquisition or demolition of the Kelso Elementary School property to implement the proposed Project would have an impact on district facilities. Inglewood USD recommend the reconsideration of the alignment. The Inglewood USD submitted a second comment letter after the release of the Revised IS/NOP indicating the District supports the Project, which will play an important role in ongoing revitalization efforts by providing convenient, reliable, and efficient public transportation to major activity centers within the City, to the benefit of the Inglewood community, and reduce extra vehicular traffic. The second letter did not request changes to the proposed alignment for the proposed Project but requested evaluation of the potential for the Project to result in impacts to school facilities located along the alignment.

In regard to public comments, several commenters voiced concerns, suggestions, and inquiries regarding the final alignment and operation of the proposed Project. Commenters suggested a number of modifications to alignment and support facility alternatives. Suggestions included adding connection to the I-105 freeway; creating an alignment along Locust Street; utilizing a portion of Edward Vincent Junior Park for the MSF; and incorporating the MSF into the Inglewood Basketball and Entertainment Center (IBEC) due to less interference with traffic, available open space, and optimal access. Further, one commenter noted that more alternatives should be considered to provide more economic development to all of the City, including Market Street.

In terms of operation of the proposed Project, one comment received noted that a station at Market Street and Florence Avenue would be a major benefit for people connecting to other locations and shopping. Another commenter stated that displacing businesses and/or residences should be avoided, and that by removing the retail shopping center, a source of healthy and organic produce would be eliminated. Other commenters expressed concerns about operation of the proposed Project, including where users would park and whether there would be fares on event and nonevent days. Another commenter would like the proposed Project to be free for seniors and lower income people. One commenter expressed concern regarding financing the proposed Project and questioned whether funding would come from property taxes, sales taxes, or parcel taxes.

## ***Construction Phasing and Impacts***

The physical impacts of construction activity were a concern voiced by several public commenters. Comments included concerns that heavy machinery and construction operations would damage or crack adjacent properties; potentially cause loss of rental income due to undesirability of rental properties near an active construction zone; and disturb current tenants.

In response to the project as originally proposed, Inglewood USD representatives stated that acquisition or demolition of the Kelso Elementary School property to implement the proposed Project would have an impact on district facilities by requiring the construction of a new school for 523 displaced students. As described above, the Project was redesigned to avoid impacting this school.

Thomas Safran & Associates (TSA) representatives commented on behalf of TSA owned properties designated for mixed-use and residential developments near the proposed Project. TSA requested analysis of the potential for aesthetics, air quality, GHG, and noise impacts on properties located at 139 North Market Street and 158 North Market Street planned for mixed use development.

## ***Historic Resources***

The Los Angeles Conservancy (LA Conservancy) expressed concern regarding the potential for the Project to impact nine historic resources located along the proposed alignment. The LA Conservancy recommended consideration of alternative routes to avoid impacts to nearby historic resources located along the proposed alignment.

## ***Mobility Issues***

Caltrans recommended the incorporation of multimodal and complete street transportation elements that will actively promote alternatives to car use and better manage existing parking assets. The recommendation aligns with Caltrans' support for transportation and land use that reduces vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions by shortening trip lengths and achieving a high level of nonmotorized travel and transit use. Caltrans also support the implementation of pedestrian safety measures such as road diets and other traffic calming measures.

Culver CityBus recommended the proposed Project to locate stations near existing transit services in the area in order to allow smooth transit connections.

In addition, one public comment recommended that the proposed Project be free for seniors and low-income people and one comment suggested that a zone limited to pedestrians be extended from the proposed Metro Crenshaw/LAX Line station in downtown Inglewood to other locations along the alignment.

## ***Policy, Plan, and Program Consistency***

Southern California Association of Governments (SCAG) recommended the incorporation of the proposed Project into the Regional Transportation Plan (RTP)/Sustainable Community Strategy (SCS) project list in order to enable access to State or federal funding. SCAG also recommends the proposed Project to recognize and consider RTP/SCS goals.

## ***Public Services***

The County of Los Angeles Fire Department (County Fire) commented on potential for the Project to impact circulation and access for emergency vehicles. Consideration of alternative route (detour) plans with a tentative schedule of planned closures prior to the beginning of construction was requested. Coordination of any disruptions to water service during construction with County Fire was also requested to ensure alternative water sources would be provided.

## ***Transportation Impacts***

A number comments were received on potential impacts on the street and roadway network were received. A primary concern was the potential for increased traffic throughout the City due to construction and potential modifications to existing streets.

The California Public Utilities Commission (CPUC) commented on the potential for the proposed Project to disrupt the roadway network in the surrounding community during construction, and recommended consideration of traffic circulation and queuing, level of service, emergency service response, and Americans with Disabilities Act (ADA) compliance. The CPUC also noted that automated people mover (APM) trains must comply with CPUC rules and regulations, CPUC General Orders, and American Society of Civil Engineers Automated People Mover Standards.

Additionally, one public comment expressed concern regarding the loss of pedestrian access along Market Street. Caltrans also commented that the proposed Project should incorporate multimodal and complete streets transportation elements to actively promote alternatives to car use and better manage existing parking assets, and requested that the City evaluate the proposed Project for access problems, vehicle miles traveled, and service needs that may need to be addressed.

## ***Tribal Resources Impacts***

The Native American Heritage Commission (NAHC) recommended that the City consult with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed Project in accordance with applicable State laws in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.

## ***Utility Impacts***

The West Basin Municipal Water District (West Basin) noted that most West Basin recycled water distribution pipelines are located at least 3.5 feet below ground and within the public right-of-way. If relocation of the pipelines would be needed, a request should be submitted at least 6 months in advance of the required relocation. Additionally, the West Basin Kenneth Hahn Lateral project is investigating opportunities to provide recycled water from the existing 36-inch pipeline that ends at the intersection of Prairie Avenue and Florence Avenue, in the City of Inglewood, to Kenneth Hahn State Park, Baldwin Hills area, and into Culver City.

The County of Sanitation Districts of Los Angeles County (Sanitation District) and the Los Angeles Department of Public Works (LADWP) commented that the proposed Project may impact existing and/or proposed facilities (e.g., trunk sewers, waterlines, drainage pipes, etc.) over which it will be constructed. Both agencies indicated utility facilities are directly under and/or cross directly beneath the proposed Project footprint. Both agencies requested that project plans and specifications be provided for review. Once the plans and specifications are submitted, the agencies can provide additional responses and issue permits for construction.

## ***Cumulative Impacts***

The Centinela/Florence Avenues Grade Separation Project by Metro will have construction activities concurrent with the schedule of the proposed Project. Metro requested that analysis take into consideration the construction impacts and activities of the Centinela/Florence Avenues Grade Separation Project as it relates to the proposed Project.

## **1.6 PROPOSED MITIGATION MEASURES**

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

## **1.7 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL EFFECTS**

As required by the State CEQA Guidelines Section 15126.2(b), this section identifies the significant environmental effects that cannot be avoided if the proposed Project is implemented. The State CEQA Guidelines require that an EIR “Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without

imposing an alternative design, their implications, and the reasons why the project is being proposed, notwithstanding their effect, should be described.”<sup>10</sup>

The following impacts have been identified in the analyses in the Draft EIR as having significant and unavoidable impacts. The corresponding EIR section is listed for reference purposes. The threshold under which a significant and unavoidable impact is identified is provided, followed by a summary discussion of the proposed Project’s impact under the threshold(s).

### 1.7.1 Aesthetics

**Impact AES-1a:** The proposed Project would substantially degrade the existing visual character or quality of public views of the site and its surroundings. This also applies under cumulative conditions.

While the Project would not result in significant impacts to the overall visual character of Downtown Inglewood along Market Street, the guideway would obstruct views of the former Fox Theater building, identified as a historic resource due the architectural design of the building. Mitigation measures and project design features included in the ITC Design Guidelines would reduce this impact to the extent feasible, however, this indirect impact on the visual character of this building would be a significant and unavoidable impact of the Project

### 1.7.2 Air Quality

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

**Impact AQ-2:** Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.

Even with the implementation of all feasible mitigation measures, including requiring use of off-road diesel-powered construction equipment that meets or exceeds Tier 4 Final off-road emissions standards or equivalent for all equipment rated at 50 horsepower or greater, dust control measures, and maximizing the use of electric-powered construction equipment, construction-related daily emissions would exceed the SCAQMD significance threshold for NOx.

---

<sup>10</sup> California Code of Regulations, tit. 14, div. 6, ch. 3, California Environmental Quality Act Guidelines, sec. 15126.2(b).

### 1.7.3 Cultural

**Impact CUL-1:** The proposed Project would cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.

The proposed APM guideway would be located directly in front of the former Fox Theater building on Market Street and visually obscure a portion of the sign pylon, creating a visual separation between the uppermost portion of the pylon and the lower portion of the building containing the theater marquee and public entrance. The APM guideway would also block views of the primary façade of the building, making it difficult to appreciate the overall design of the building. Because the ability of the former Fox Theater to convey its historic significance would be impaired following the implementation of the proposed Project, the indirect impact on the former Fox Theater is identified as a significant impact of the Project that cannot be avoided.

As the guideway turns east on Manchester Boulevard, it would partially intrude into the former People's Federal Building & Loan Association building located at 150 S. Market Street. The intrusion is necessary to accommodate for the turning radius of the guideway at this location. Acquisition and demolition of this building is proposed to accommodate the guideway. Demolition of this building is identified as a significant impact of the Project that cannot be avoided.

## 1.8 SUMMARY TABLE

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

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

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

relevant impact analysis. A description of the organization of the environmental analysis, as well as key assumptions regarding the approach to the analysis, is provided in **Section 4.0**.

**Table 1.0-4  
Summary of Findings**

<b>Impact</b>	<b>Significance Before Mitigation</b>	<b>Mitigation Measures</b>	<b>Significance After Mitigation</b>
NOTES: LS = less than significant; PS = potentially significant; S = Significant; SU = significant and unavoidable; NI = no impact; NA = not applicable			
<b>4.1 Aesthetics</b>			
<b>Impact AES-1a:</b> Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project cause degradation to visual character?	PS	See <b>MM CUL-1</b> to <b>MM CUL-3</b>	SU
<b>Threshold AES-1b:</b> If the project is in an urbanized area, would the project be consistent with applicable zoning and planning regulations governing scenic quality?	LS	None Required	LS

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
NOTES: LS = less than significant; PS = potentially significant; S = Significant; SU = significant and unavoidable; NI = no impact; NA = not applicable			
<b>Threshold AES-2:</b> Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.	LS	None Required	LS
<b>4.2 Air Quality</b>			
<b>Impact AQ-1:</b> Conflict with or obstruct implementation of the applicable air quality plan.	PS	<b>See MM AQ-1 to MM AQ-11.</b>	SU
<b>Impact AQ-2:</b> Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.	PS	<b>MM AQ-1:</b> Construction contractors shall, at a minimum, use equipment that meets the USEPA's Final Tier 4 emissions standards for off-road diesel-powered construction equipment with 50 horsepower (hp) or greater, for all phases of construction activity, unless it can be demonstrated to the City of Inglewood Planning Division with substantial evidence that such equipment is not available. To ensure that Final Tier 4 construction equipment or better shall be used during the proposed Project's construction, the City of Inglewood shall include this requirement in applicable bid documents, purchase orders, and contracts. The City of Inglewood shall also require periodic reporting and provision of written construction documents by construction contractor(s) and conduct regular inspections to the maximum extent feasible to ensure and enforce compliance. Such equipment will be outfitted with Best Available Control Technology devices including a CARB certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPF are capable of achieving at least 85 percent reduction in particulate matter emissions. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by Final Tier	SU

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

4 emissions standards for a similarly sized engine, as defined by the CARB’s regulations. Successful contractors must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. The proposed Project representative will make available to the lead agency and SCAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used during construction. The inventory will include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit’s certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be maintained on site at the time of mobilization for each applicable piece of construction equipment.

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

- The Contractor does not have the required type of off-road construction equipment within its current available inventory as to a particular vehicle or equipment by leasing or short-term rent, and the Contractor has attempted in good faith and with due diligence to lease or short-term rent the equipment or vehicle, but the equipment or vehicle is not available for lease or short-term rent within 120 miles of the Project alignment, and the Contractor has submitted documentation to the City of Inglewood showing that the requirements of this exception provision apply.
- The Contractor has been awarded funding by SCAQMD or another agency that would provide some or all of the cost to retrofit, repower, or purchase a piece of equipment or vehicle, but the funding has not yet been provided due to circumstances beyond the Contractor’s control, and the Contractor

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

has attempted in good faith and with due diligence to lease or short-term rent the equipment or vehicle that would comply, but the equipment or vehicle is not available for lease or short-term rent within 120 miles of the Project alignment, and the Contractor has submitted documentation to the City of Inglewood showing that the requirements of this exception provision apply.

- Contractor has ordered equipment or vehicle to be used on the construction project in compliance at least 60 days before that equipment or vehicle is needed at the Project alignment, but that equipment or vehicle has not yet arrived due to circumstances beyond the Contractor’s control, and the Contractor has attempted in good faith and with due diligence to lease or short-term rent the equipment or vehicle that would comply, but the equipment or vehicle is not available for lease or short-term rent within 120 miles of the project site, and the Contractor has submitted documentation to the City of Inglewood showing that the requirements of this exception provision apply.
- Construction-related diesel equipment or vehicle will be used on the Project alignment for fewer than 20 calendar days per calendar year. The Contractor shall not consecutively use different equipment or vehicles that perform the same or a substantially similar function in an attempt to use this exception to circumvent the intent of this mitigation measure.
- Documentation of good faith efforts and due diligence regarding the previous exceptions shall include written record(s) of inquiries (i.e., phone logs) to at least three leasing/rental companies that provide construction on-road trucks and off-road equipment, documenting the availability/unavailability of the required types of truck/equipment. The City of Inglewood will, from time-to-time, conduct independent audit of the availability of such vehicles and equipment for lease/rent within a 120 mile

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

radius of the project site, which may be used in reviewing the acceptability of the Contractor’s good faith efforts and due diligence.

**MM AQ-2:** Equipment such as concrete/industrial saws, pumps, aerial lifts, light stands, air compressors, and forklifts shall be electric or alternative-fueled (i.e., non-diesel). Pole power shall be utilized at the earliest feasible point in time and shall be used to the maximum extent feasible in lieu of generators. If stationary construction equipment, such as diesel-powered generators, must be operated continuously, such equipment must be Final Tier 4 construction equipment or better and located at least 100 feet from air quality sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible.

**MM AQ-3:** At a minimum, require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year trucks (e.g., material delivery trucks and soil import/export with a gross vehicle weight rating of at least 14,001 pounds), or best commercially available equipment, that meet CARB’s 2010 engine emissions standards at 0.01 g/hp-hour of particulate matter and 0.20 g/hp-hour of NOx emissions or newer, cleaner trucks, unless the Contractor provides written documentation consistent with project contract requirements the circumstances identified in MM AQ-1 exist and the Contractor submits an alternative compliance plan. Operators shall maintain records of all trucks associated with Project construction to document that each truck used meets these emission standards. The City of Inglewood shall include this requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with Project construction to document that each truck used meets these emission standards and make the records available for inspection.

**MM AQ-4:** Require the use of electric or alternatively fueled (e.g., natural gas) sweepers with high-efficiency particulate air (HEPA) filters.

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
NOTES: LS = less than significant; PS = potentially significant; S = Significant; SU = significant and unavoidable; NI = no impact; NA = not applicable			
		<p><b>MM AQ-5:</b> A publicly visible sign shall be posted with the telephone number and person to contact at the City of Inglewood regarding dust complaints. This person shall respond and take corrective action with 24 hours. The Air District’s phone number shall also be visible to ensure compliance with applicable regulations.</p> <p><b>MM AQ-6:</b> All roadways, driveways, sidewalks, etc., being installed as part of the project should be completed as soon as practical; in addition, building pads should be laid as soon as practical after grading.</p> <p><b>MM AQ-7:</b> To the extent feasible, allow construction employees to commute during off-peak hours.</p> <p><b>MM AQ-8:</b> Make access available for on-site lunch trucks during construction, as feasible, to minimize off-site construction employee vehicle trips.</p> <p><b>MM AQ-9:</b> Every effort shall be made to utilize grid-based electric power at any construction site, where feasible. Grid-based power can be from a direct hookup or a tie into electricity from power poles.</p> <p><b>MM AQ-10:</b> Contractors shall maintain and operate construction equipment to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer’s specifications and documentation demonstrating proper maintenance, in accordance with the manufacturer’s specifications, shall be maintained on site. Tampering with construction equipment to increase horsepower or to defeat emission control devices must be prohibited.</p> <p><b>MM AQ-11:</b> Enter into applicable bid documents, purchase orders, and contracts to notify all construction vendors, contractors, and/or haul truck operators that vehicle and construction equipment idling time will be limited to no longer than five minutes, consistent with the CARB’s policy. For any idling that is expected to take longer than five minutes, the engine should be shut off. Notify construction vendors, contractors, and/or haul truck operators of these idling requirements at the time that the purchase order is issued and again when vehicles enter the</p>	

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
NOTES: LS = less than significant; PS = potentially significant; S = Significant; SU = significant and unavoidable; NI = no impact; NA = not applicable			
<p><b>Impact AQ-3:</b> Expose sensitive receptors to substantial pollutant concentrations.</p>	PS	<p>Project alignment. To further ensure that drivers understand the vehicle idling requirement, post signs at the proposed Project entry gates and throughout the Project alignment, where appropriate, stating that idling longer than five minutes is not permitted.</p> <p><b>See MM AQ-1 to MM AQ-11.</b></p>	LS
<b>4.3 Biology Resources</b>			
<p><b>Impact BIO-1:</b> Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.</p>	PS	<p><b>BIO-1 Conservation of Faunal Resources: Nesting Birds/Raptors:</b> The City shall require demolition and construction contractors to implement the following measures:</p> <ul style="list-style-type: none"> <li>• Prior to initiating any demolition and/or construction activities, a nesting bird survey shall be conducted to determine the presence of any nesting birds within 500 feet of demolition and/or construction activities. In addition, nesting bird surveys shall be conducted at least every six (6) months until the completion of construction activities, as specified below.</li> </ul> <p>Nesting bird survey shall include:</p> <ul style="list-style-type: none"> <li>– Prior to any demolition and/or construction, and a least every six (6) months during and prior to the raptor nesting season until the completion of construction activities, January 1 to September 1, a qualified biologist shall conduct a site survey for active nests 30 days prior to any scheduled clearing, demolition, grading, or construction activities. The survey shall be conducted within all trees, manmade structures, and any other potential raptor nesting habitat.</li> <li>– Prior to any vegetation disturbance between March 1 and September 15, and a least every six (6) months until the completion of construction</li> </ul>	LS

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

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

- During the year prior to demolition and/or construction, a survey shall be conducted by a qualified biologist for bat habitat areas within the construction footprint of the proposed Project between March 1 and September 30 and a least every six (6) months until the completion of construction activities. The areas shall be characterized as to their potential for supporting a bat maternal colony or nursery site. The survey

Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
NOTES: LS = less than significant; PS = potentially significant; S = Significant; SU = significant and unavoidable; NI = no impact; NA = not applicable			
		<p>shall include all trees and any manmade structures, or other bat habitat areas that could be affected. If bat maternal colony or nursery sites are identified, then these areas shall be avoided by demolition and/or construction during the bat breeding season, from March 1 through September 30. Each tree or structure supporting an active maternity roost shall be inspected a week prior to disturbance to determine the presence or absence of roosting bats.</p> <ul style="list-style-type: none"> <li>The biologist shall submit weekly reports to the City’s Parks, Recreation and Library Services Director, or designated representative, regarding the results of the nesting bird surveys.</li> </ul>	
<p><b>Impact BIO-2:</b> Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.</p>	LS	None Required	LS

**4.4 Cultural Resources**

<p><b>Impact CUL-1:</b> Cause a substantial adverse change in the significance of a historical resource as</p>	PS	<p><b>MM CUL-1:</b> The building located at 150 S. Market Street (the former People’s Federal Building &amp; Loan Association Building) shall be documented to Historic American Buildings Survey (HABS) Level III prior to demolition. HABS Level III documentation includes a sketch plan, photographs with large-format negatives or exterior and interior views, and the completion of an architectural data form. Copies of the</p>	SU
--	----	--	----

defined in Section 15064.5.

completed HABS documentation shall be archived with the South Central Coast Information Center at California State University, Fullerton, as well as with the Los Angeles Conservancy and the Inglewood Public Library. An additional archival copy of the documentation shall be offered to the Inglewood Historic Preservation Alliance.

**MM CUL-2:** Wherever support columns would come into close proximity to the Fox Theater building, these columns shall be situated as far away as possible from the publicly visible façades of the building as feasible; and to the extent possible, the location of the columns shall be shifted to either side of the building rather than directly in front of it, to minimize visual impacts.

**MM CUL-3:** Wherever APM station vertical circulation elements, such as escalators, elevators, and stairs, would come into close proximity with the Fox Theater building, these elements shall be situated with as much distance from the publicly visible façades of the building as is feasible; and to the extent possible, the placement of these elements shall be shifted to either side of the resource rather than directly in front of it, to minimize visual impacts.

<p><b>Impact CUL-2:</b> Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?</p>	<p>PS</p>	<p><b>See MM TCR-1 to MM TCR-4.</b></p>	<p>LS</p>
<p><b>Impact CUL-3:</b> Disturb any human remains, including those interred outside of formal cemeteries.</p>	<p>PS</p>	<p><b>See MM TCR-1, MM TCR-3, MM TCR-5.</b></p>	<p>LS</p>

---

#### 4.5 Energy

<b>Impact E-1:</b> Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.	LS	None Required	LS
<b>Impact E-2:</b> Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.	LS	None Required	LS

#### 4.6 Geology

<b>Impact GEO-1:</b> Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known	PS	<b>MM GEO-1:</b> The proposed Project shall be designed to accommodate fault rupture where present in accordance with applicable Caltrans guidelines, including Memo to Designers 20-8 (Analysis of Ordinary Bridges that Cross Faults), dated January 2013; and Memo to Designers 20-10 (Fault Rupture), dated January 2013, where any portion of a structure falls within an APEFZ, or where any portion of a structure falls within approximately 100 meters (330 feet) of well-mapped active faults, or within 300 meters (1,000 feet) of an un-zoned fault (not in an APEFZ) that is Holocene or younger in age.  Stations and elevated structures for the APM Guideway shall be located to avoid the fault rupture hazard where present with refinement of station and APM Guideway placement worked into final design as needed. As noted in Caltrans Memorandum to Designers (MTD) 20-8, bridge type structures, such as the APM Guideway, must be designed for the displacement demand resulting from a static fault offset, the dynamic response due to ground shaking, and any other fault-induced	LS
--	----	---	----

fault. Refer to Division of Mines and Geology Special Publication 42.

hazards (e.g., creep) that may occur at the site. Caltrans MTD 20-8 provides a method for obtaining the displacements at columns and abutments at fault crossings; all the requirements must also be followed. Adequate bearing seats must be provided so the superstructure can slide at the abutment, bent, or hinge seats without falling.

**MM GEO-2:** During site investigation prior to the start of construction, the location of the anticipated trend of the Townsite Fault shall be further defined via a phased investigation process to identify and locate active fault traces in the Project area to support adjustments to the proposed Project's design.

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

The investigation shall include the following surface and subsurface methods:

- Aerial photograph analysis;
- Geophysical surveys (e.g., seismic reflection and/or seismic refraction) to refine the identified geophysical anomaly associated with the Townsite fault and inform subsequent targeted fault hazard exploration as necessary;
- Targeted fault trenching based on the findings of additional geophysical studies to locate the potential Townsite fault where it crosses the proposed ITC alignment; and
- Exploratory drilling and sampling (e.g., hollow stem auger and CPT borings), as necessary, if definitive information regarding the trace of the Townsite fault cannot be adequately delineated across the proposed ITC alignment within the limits of fault trenching.

Based on the results of these investigations, column placements and facility designs would be adjusted to accommodate geologic conditions identified. Further, the facilities shall be designed in accordance with

applicable Caltrans guidelines including Memo to Designers 20-8 (Analysis of Ordinary Bridges that Cross Faults) and 20-10 (Fault Rupture). Stations/structures shall be located to avoid the fault rupture hazard where present.

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

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

Probabilistic procedures shall follow those outlined in Abrahamson [2008] and Petersen et al., [2011] of the *Fault Rupture Hazard Evaluation* (Appendix 4.6.1: Fault Rupture Study). These procedures allow for evaluation of offset based on the results of field investigation. If further study of the fault rupture is conducted, then procedures as outlined in CGS Note 4911 shall be followed.

**MM GEO-3:** The proposed APM system facilities shall be designed in accordance with applicable Caltrans guidelines including Memo to Designers 20-8 (Analysis of Ordinary Bridges that Cross Faults) and 20-10 (Fault Rupture). The response spectra provided in the Development of Seismic Design Criteria in Support of Draft EIR - Seismic Design Criteria (**Appendix 4.6.2**) shall be considered applicable for both aerial guideway and ancillary structures within each segment of the alignment under the guideway and each station.

Probabilistic procedures also shall follow those outlined Caltrans memo to Designers 20-10 -Fault Rupture, dated January 2013.

**Impact GEO-2:** Directly or indirectly cause

LS

None required.

LS

<sup>11</sup> California Geological Survey, Note 49: Guidelines for Evaluating the Hazard of Surface Fault Rupture, <https://www.conservation.ca.gov/cgs/Documents/Publications/CGS-Notes/CGS-Note-49.pdf>

potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.

**Impact GEO-3:** Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? PS

**MM GEO-4:** A qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (SVP, 2010) shall be retained by the project applicant and approved by the City prior to the approval of grading permits. The qualified paleontologist shall: LS

a) Prepare, design, and implement a monitoring and mitigation program for the Project consistent with Society of Vertebrate Paleontology Guidelines. The Plan shall define pre-construction coordination, construction monitoring for excavations based on the activities and depth of disturbance planned for each portion of the Project Site, data recovery (including halting or diverting construction so that fossil remains can be salvaged in a timely manner), fossil treatment, procurement, and reporting. The Plan monitoring and mitigation program shall be prepared and approved by the City prior to the issuance of the first grading permit. If the qualified paleontologist determines that the Project-related grading and excavation activity would not affect Older Quaternary Alluvium, then no further mitigation is required.

b) Conduct construction worker paleontological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.) and would present the Plan as outlined in (a). In the event construction crews are phased or rotated, additional training shall be conducted for new construction personnel working on ground-disturbing activities. The training session shall provide instruction on the recognition of the types of paleontological resources that could be encountered within the Project Site and the procedures to be followed if they are found. Documentation shall be retained by the qualified

paleontologist demonstrating that the appropriate construction personnel attended the training.

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

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

e) Prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the paleontological monitoring. If there are significant discoveries, fossil locality information and final disposition shall be included with the final report which would be submitted to the appropriate repository and the City. The final monitoring report shall be submitted to the City within 90 days of completion of excavation and other ground disturbing activities that could affect Older Quaternary Alluvium.

**4.7 Greenhouse Gas**

**Impact GHG-1:**  
Generate greenhouse gas emissions, either directly or indirectly,

LS

None Required

LS

that may have a significant impact on the environment.

<b>Impact GHG-2:</b> Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	LS	None Required	LS
--	----	---------------	----

**4.8 Hazards and Hazardous Waste**

<b>Impact HAZ-1:</b> Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	LS	None Required	LS
---	----	---------------	----

<b>Impact HAZ-2:</b> Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	LS	None Required	LS
---	----	---------------	----

**4.9 Land Use**

<b>Impact LU-1:</b> Physically divide an established community.	LS	None Required	LS
<b>Impact LU-2:</b> Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	LS	None Required	LS

**4.10 Noise and Vibration**

<b>Impact NOI-1:</b> Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	PS	<p><b>MM 4.10-1 Construction Noise Control Plan:</b> Prior to the issuance of any demolition or construction permit for each phase of project development, the Construction Manager shall develop a Construction Noise Control Plan demonstrating how to ensure increases in ambient noise levels are less than 5 dBA Leq over existing conditions. The Construction Noise Control Plan shall be developed in coordination with a certified acoustical/vibration consultant and the Construction Manager and shall be approved by the City’s Director of Public Works prior to construction. The Plan shall include the following elements:</p> <ul style="list-style-type: none"> <li>• Measurements of existing one-hour Leq noise levels at sensitive receptors prior to construction activities.</li> <li>• Construction noise measures necessary to ensure increase in noise are less than 5 dBA Leq over existing conditions. This plan could include, but would not be limited to, the following strategies:               <ul style="list-style-type: none"> <li>– Install temporary noise barriers that block line-of-sight to sensitive receptors.</li> </ul> </li> </ul>	LS
---	----	---	----

- Reduce the simultaneous use of heavy-duty construction equipment.
- Operate equipment at the lowest possible power levels.
- Use solar, battery powered, or hybrid equipment whenever practical.
- Locate staging areas as far away from sensitive receptors as feasible.
- Work on elevated guideways and stations areas shall use temporary noise barriers where possible.
- Enclose stationary noise sources with acoustical barriers where possible.
  - Stationary noise sources (e.g., generators) shall be muffled and enclosed within sheds, incorporate insulation barriers, or other measures to the extent feasible. Pole power shall be utilized at the earliest feasible point in time, and to the maximum extent feasible in lieu of generators. If stationary equipment such as diesel- or gasoline-powered generators are not enclosed within a shed or barrier, such equipment must be located at least 100 feet from sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible.
- Impact tools (i.e., jack hammers, pavement breakers, and rock drills) used for project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust and external jackets shall be used where feasible to lower noise levels. Quieter procedures shall be used, such as drills rather than impact equipment, whenever feasible. Limiting the use impact pile drivers and impact hammers operating simultaneously to reduce L<sub>max</sub> noise levels by approximately 7 dBA. Additionally, use of “quiet” pile driving technology (such as auger displacement installation), where

feasible in consideration of geotechnical and structural requirements and conditions shall be considered.

- Contractors shall coordinate with Kelso Elementary School administrators to avoid disruptive activities during school hours.

**MM 4.10-2 Designate Community Affairs Liaison. Designate a Community Affairs Liaison Officer:** This person's contact information shall be posted around the Project area, in adjacent public spaces, and in construction notifications. The Community Affairs Liaison shall be responsible for responding within 24 hours to any local complaints about construction activities. This Community Affairs Liaison shall receive all public complaints about construction noise and vibration disturbances and be responsible for determining the cause of the complaint and implementation of feasible measures to be taken to alleviate the problem.

The Community Affairs Liaison shall have the authority to coordinate with a designated construction contractor representative for the purpose of investigating the noise disturbance and undertaking all feasible measures to protect public health and safety, and shall ensure that steps be taken to reduce construction vibration levels as deemed appropriate and safe by the designated construction contractor representative. Such steps could include the application of noise and vibration absorbing barriers, substitution of lower noise and vibration generating equipment or activity, rescheduling of noise and vibration-generating construction activity, or other potential adjustments to the construction program to reduce noise and vibration impacts at the adjacent noise and vibration-sensitive receptors.

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

LS

**MM 4.10-3 Construction Vibration Reduction Plan:** Prior to the issuance of any demolition or construction permit for each phase of project development, a Construction Vibration Reduction Plan shall be prepared to minimize construction vibration at nearby sensitive receptors from vibration created by construction activities. The Plan shall be developed in coordination with a certified acoustical/vibration consultant and the Construction Manager and shall be approved by the City's Director of Public Works. The Plan shall include but not be limited

to the following elements to ensure impacts from groundborne vibration are less than significant:

- A. A Pre-Demolition and Construction Plan that includes but not limited to:
    - i. Photos of current conditions of buildings and structures that could be damaged from construction activities. This crack survey shall include photos of existing cracks and other material conditions present on or at the surveyed buildings. Images of interior conditions shall be included if possible. Photos in the report shall be labelled in detail and dated.
    - ii. Identify representative cracks in the walls of existing buildings, if any, and install crack gauges on such walls of the buildings to measure changes in existing cracks during project activities. Crack gauges shall be installed on multiple representative cracks, particularly on sides of the building facing the project.
    - iii. Determine the number and placement of vibration sensors at the affected buildings in consultation with a qualified architect. The number of units and their locations shall take into account proposed demolition and construction activities so that adequate measurements can be taken illustrating vibration levels during the course of the project, and if/when levels exceed the established threshold.
    - iv. A line and grade pre-construction survey at the affected buildings shall be conducted.
  - B. A Vibration Plan During Demolition and Construction:
    - i. The Construction Manager shall regularly inspect and photograph crack gauges, maintaining records of these inspections to be included in postconstruction reporting. Gauges shall be inspected every two weeks, or more frequently during periods of active project actions in close proximity to crack monitors.
    - ii. The vibration monitoring system shall measure and continuously store the peak particle velocity (PPV) in
-

inches/second. Vibration data shall be stored on a one-second interval. The system shall also be programmed for two preset velocity levels: a regulatory level that represents when PPV levels would exceed the FTA's threshold of significance for a building given its conditions, and a warning level that is 0.05 inch/second (PPV) less than the regulatory level. The system shall also provide real-time alert when the vibration levels exceed either of the two preset levels.

- iii. In the event the warning level (PPV) is triggered, the contractor shall identify the source of vibration impacts and establish steps to reduce the vibration levels, including but not limited to halting or staggering concurrent activities and using lower vibratory techniques.
- iv. In the event the regulatory level (PPV) is triggered, the Construction Manager shall halt the construction activities in the vicinity of the Project area and visually inspect the building for any damage. Results of the inspection must be logged. The Construction Manager shall identify the source of vibration generation and provide steps to reduce the vibration level. Vibration measurement shall be made with the new construction method to verify that the vibration level is below the warning level (PPV). Construction activities may then restart.
- v. In the event damage occurs to historic finish materials due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant.
- vi. The Construction Manager shall collect vibration data from receptors and report vibration levels to the City Chief Building Official on a daily basis.

The reports shall include annotations regarding project activities as necessary to explain changes in vibration levels.

C. Post-Construction:

---

- i. The Construction Manager shall provide a report to the City Chief Building Official regarding crack and vibration monitoring conducted during demolition and construction. In addition to a narrative summary of the monitoring activities and their findings, this report shall include photographs illustrating the post-construction state of cracks and material conditions that were presented in the pre-construction assessment report, along with images of other relevant conditions showing the impact, or lack of impact, of project activities. The photographs shall sufficiently illustrate damage, if any, caused by the project and/or show how the project did not cause physical damage to the buildings. The report shall include analysis of vibration data related to project activities, as well as summarize efforts undertaken to avoid vibration impacts. Finally, a postconstruction line and grade survey shall also be included in this report.
- ii. The Construction Manager shall be responsible for repairs and damage to buildings if damage is caused by vibration or movement during the demolition and/or construction activities. Repairs may be necessary to address, for example, cracks that expanded as a result of the project, physical damage visible in post-construction assessment, or holes or connection points that were needed for shoring or stabilization. Repairs shall be directly related to project impacts and will not apply to general rehabilitation or restoration activities of the buildings.

**MM 4.10-4 Construction Equipment Locations (Building Damage):** To address potential structural and building damage, the following measures are proposed to reduce vibration impacts:

- Limit the location of pile driving and vibratory roller activity to not be within 55 feet and 30 feet of the nearest off-site sensitive receptor, respectively.
  - Limit the number of jackhammers operating simultaneously to one (1) piece operating within 45 feet of off-site sensitive receptors.
-

- In the event impact pile driving is required, equipment shall only be used from the hours of 7:00 AM to 7:00 PM. If feasible, pile driving should use alternative technology such as vibration or hydraulic insertion.

**MM 4.10-5 Construction Equipment Locations (Human Annoyance):**

To reduce construction vibration impacts related to human annoyance, the following measures are proposed:

- Limit the location of pile driving to 310 feet of off-site vibration sensitive receptors.
- Limit the location of vibratory roller to 150 feet of off-site vibration sensitive receptors.
- Limit the location of large bulldozer to 85 feet of off-site vibration sensitive receptors.
- Limit the location of caisson drilling to 85 feet of off-site vibration sensitive receptors.
- Limit the location of loaded trucks to 75 feet of off-site vibration sensitive receptors.
- Limit the location of jackhammers to 45 feet of off-site vibration sensitive receptors.
- Limit the location of small bulldozer to 25 feet of off-site vibration sensitive receptors.

**4.11 Population, Employment, and Housing**

<p><b>Impact POP-1:</b> Induce substantial unplanned population or employment growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of</p>	<p>LS</p>	<p>None Required</p>	<p>LS</p>
--	-----------	----------------------	-----------

roads or other infrastructure)?

**4.12 Transportation**

**Impact T-1:** Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? LS None Required LS

**Impact T-2:** Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? LS None Required LS

**Impact T-3:** Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? LS None Required LS

**Impact T-4:** Result in inadequate emergency access? LS None Required LS

**4.13 Tribal Cultural Resources**

**Impact TCR-1:** Cause a substantial adverse change in the PS **MM TCR-1: Retention of a Tribal Cultural Resources Monitor/Consultant.** Prior to the commencement of any ground disturbing activity at the project site, the project applicant shall retain LS

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

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

**ii)** A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §

a qualified archaeologist meeting the Secretary of the Interior’s Professional Qualifications Standards for archaeology (US Department of the Interior, 2008) to carry out all mitigation related to cultural resources. In addition, a Native American Monitor shall be designated by the Gabrieleno Band of Mission Indians-Kizh Nation – the tribe that consulted on this project pursuant to Assembly Bill A52 (the “Tribe” or the “Consulting Tribe”). If no Native American Monitor is designated within a reasonable period of time (not to exceed 30 days), the activity can commence without the designated Monitor. A copy of the executed contract shall be submitted to the City of Inglewood Planning and Building Department prior to the issuance of any permit necessary to commence a ground-disturbing activity. The Tribal monitor will only be present on- site during the construction phases that involve ground-disturbing activities. Ground disturbing activities are defined by the Tribe as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Tribal Monitor will complete daily monitoring logs that will provide descriptions of the day’s activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project Site are completed, or when the Tribal Representatives and Tribal Monitor have indicated that all upcoming ground- disturbing activities at the Project Site have little to no potential for impacting Tribal Cultural Resources. Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 50 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the qualified archaeologist and Tribal monitor approved by the Consulting Tribe. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes. If human remains and/or grave goods are discovered or recognized at the Project Site, all ground disturbance shall

5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

immediately cease, and the county coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the Project Site while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]). If a non-Native American resource is determined by the qualified archaeologist to constitute a “historical resource” or “unique archaeological resource,” time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA.

Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

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

**MM TCR-2: Monitoring and Mitigation Plan.** Prepare, design, and implement a monitoring and mitigation program for the Project. The Plan shall define pre-construction coordination, construction monitoring for excavations based on the activities and depth of disturbance planned for each portion of the Project area, data recovery (including halting or diverting construction so that archaeological

remains can be evaluated and recovered in a timely manner), artifact and feature treatment, procurement, and reporting. The Plan shall be prepared and approved by a qualified archaeologist prior to the issuance of the first grading permit.

**MM TCR-3: Cultural Resources Sensitivity Training.**

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

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

entirely, if determined adequate by the qualified archaeologist and the Native American monitor.

1. In the event of the discovery of any archaeological materials during implementation of the Project, all work shall immediately cease within 50 feet of the discovery until it can be evaluated by the qualified archaeologist. Construction shall not resume until the qualified archaeologist has made a determination on the significance of the resource(s) and provided recommendations regarding the handling of the find. If the resource is determined to be significant, the qualified archaeologist will confer with the project applicant regarding recommendation for treatment and ultimate disposition of the resource(s).

2. If it is determined that the discovered archaeological resource constitutes a historical resource or a unique archaeological resource pursuant to CEQA, avoidance and preservation in place is the preferred manner of mitigation. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement.

3. In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, a Cultural Resources Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with the project applicant, and appropriate Native American representatives (if the find is of Native American origin). The Cultural Resources Treatment Plan shall provide for the adequate recovery of the scientifically consequential information contained in the archaeological resource through laboratory processing and analysis of the artifacts. The Treatment Plan will further make recommendations for the ultimate curation of any archaeological materials, which shall be curated at a public, non-profit curation facility, university, or museum with a research interest in the materials, if such an institution agrees to accept them. If resources are determined to be Native American in origin, they will first be offered to the Tribe for

permanent curation, repatriation, or reburial, as directed by the Tribe. If no institution or Tribe accepts the archaeological material, then the material shall be donated to a local school or historical society in the area for educational purposes.

4. If the resource is identified as a Native American, the qualified archaeologist and the City shall consult with appropriate Native American representatives, as identified through the AB 52 consultation process in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond that which is scientifically important, are considered.

5. Prepare a final monitoring and mitigation report for submittal to the City, and the South Central Coastal Information Center (SCCIC), in order to document the results of the archaeological and Native American monitoring. If there are significant discoveries, artifact and feature analysis and final disposition shall be included with the final report, which will be submitted to the SCCIC and the applicant. The final monitoring report shall be submitted to the applicant within 90 days of completion of excavation and other ground disturbing activities that require monitoring.

**4.14 Utilities**

<p><b>Impact U-1:</b> Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which</p>	<p>PS</p>	<p><b>MM UT-1:</b> Prior to the award of the DBFOM contract, and start of any demolition or construction activities, the City shall be responsible identifying the locations of existing utilities potentially affected by the Project. This shall include coordinating with all existing utility providers for wet and dry utilities (water, sewer, gas, electric, and telecommunications) to obtain documentation of existing utility locations. Field verification (i.e., potholing and other methods as appropriate) shall be conducted to document the locations of all utilities within 20 feet of the proposed Project’s guideway and station foundations.</p> <p>Based on the information from the field investigations, the DBFOM contractor shall be responsible for coordinating with the appropriate utility owners/operators to determine specific set back requirements</p>	<p>LS</p>
--	-----------	---	-----------

could cause significant environmental effects.

for each utility line and the need for any stabilization for protection in place or relocation measures.

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