

## 6.0 OTHER ENVIRONMENTAL CONSIDERATIONS

---

### 6.1 INTRODUCTION

California Environmental Quality Act (CEQA) Guidelines section 15126<sup>1</sup> requires that all phases of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. Further, CEQA Guidelines section 15126.2(a) requires that the evaluation of significant impacts consider direct and reasonably foreseeable indirect effects of the proposed Project over the short-term and long-term. The Environmental Impact Report (EIR) must identify (1) significant environmental effects that cannot be avoided if the proposed Project is implemented, (2) significant irreversible environmental changes that would result from implementation of the proposed Project, (3) effect found not to be significant, and (4) growth-inducing effects of the proposed Project.

### 6.2 SIGNIFICANT UNAVOIDABLE IMPACTS

CEQA Guidelines section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. The significant environmental impacts of the proposed Project are identified below.

#### ***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.

#### ***Air Quality***

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

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

---

1 CEQA Guidelines sections 15126.2(a), (c-e).

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.

**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.

**Cultural**

**Impact CUL-1:** The proposed Project would cause substantial adverse changes in the significance of historical resources 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.

**6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES**

Under CEQA, an EIR must evaluate the extent to which the Proposed Project primary and secondary effects would generally commit future generations to the allocation of nonrenewable resources and to irreversible environmental damage. Specifically, CEQA Guidelines section 15126.2(d)<sup>2</sup> states:

*Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit*

---

2 EQA Guidelines sections 15126.2(d).

*future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

The evaluation below addresses whether the Proposed Project would result in significant irreversible environmental changes if they would:

- Involve a large commitment of nonrenewable resources;
- Result in primary or secondary impacts that would generally commit future generations to similar uses;
- Involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- Result in consumption of resources that is not justified (e.g., the project involves the wasteful use of energy).

Each of these issues is discussed below for the proposed Project.

### **Commitment of the Project for Future Generations**

Development of the proposed Project would result in the commitment of the Project area to a transit use along with accompanying support facilities uses, thereby precluding other uses for the lifespan of the proposed Project, a period of time anticipated to be at least 50 years.

### **Irreversible Environmental Damage**

The CEQA Guidelines also require a discussion of the potential for irreversible environmental damage that could be caused by an environmental accident associated with the proposed Project. While the proposed Project could result in the use, transport, storage, and disposal of limited amounts of hazardous wastes during construction and operation, all activities would comply with applicable State and federal laws related to hazardous materials, which significantly reduce the likelihood and severity of the occurrence of accidents that could result in irreversible environmental damage.

Over the past decade, the understanding of global climate change and the role that communities can play in mitigating and/or adapting to it has grown tremendously. There is broad scientific consensus that recent changes in climatic conditions, including increases in global temperatures, are associated with corresponding increases of greenhouse gases (GHGs). Temperature increases are beginning to affect regional climates and continued increases are expected result in impacts to the southern California region and the world. Climate change is anticipated to have profound implications for the availability of the natural resources on which economic prosperity and human development depend.

Greenhouse Gas Emissions, the emission of GHGs is known to have long-term effects on atmospheric conditions that affect the global climate, with resultant changes in sea level, hydrological conditions in rivers, heat island effects, and a range of other conditions. While these changes are not considered irreversible, they could last for generations. The proposed Project could result in short-term increases in GHG emissions during construction, but through the implementation of mitigation measures identified in this Draft EIR, the construction-related GHG emissions would be reduced. Operation of the proposed Project would result in a decrease in GHG emissions as it would provide for the conversion of vehicles trips in the area to ridership on the APM trains. As such, the proposed Project would not contribute to global climate changes and related irreversible environmental damage.

## **Unjustified Consumption of Resources**

Resources that would be permanently and continually consumed by implementation of the proposed Project include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would not result in the unnecessary, inefficient, or wasteful use of resources.

### ***Project Construction***

As shown in **Table 4.5-2** and **Table 4.5-3** in **Section 4.5: Energy Resources**, a total of approximately 172,177 kWh of electricity and 4,102,730 gallons of petroleum is estimated to be consumed during construction of the proposed Project. Construction activities do not typically involve the consumption of natural gas, as construction equipment and staging rely heavily on electricity and transportation fuels. Accordingly, natural gas would likely not be needed to support construction activities; thus, there would be little to no demand generated by construction.

Construction of the proposed Project would result in the irretrievable commitment of construction materials (e.g., steel products, cement, glass). While construction of the proposed Project would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment, the consumption of fossil fuels would occur on a temporary basis during the construction period.

Construction of the proposed Project would employ fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations in accordance with the California Air Resources Board (CARB) Pavley Phase II standards, the anti-idling regulation in accordance with section 2485 in Title 13 of the (CCR), and fuel requirements for stationary equipment in accordance with section 93115 (concerning Airborne Toxic Control Measures) in Title 17 of the CCR. Use of construction equipment that

is compliant with these regulations would result the use of more fuel-efficient engines and associated fuel savings.

The proposed Project would divert mixed construction and demolition debris to City-certified construction and demolition waste processors using City-certified waste haulers, which would reduce truck trips to landfills, and increase the amount of waste recovered (e.g., recycled, reused, etc.) at material recovery facilities, thereby further reducing transportation fuel consumption. As such, the consumption of energy during project construction would not be wasteful, inefficient, or unnecessary.

### ***Project Operation***

Operation of the Proposed Project would result in the demand for electricity and natural gas for project operations, and gasoline and diesel fuel for transportation and backup generation functions.

As shown in **Table 4.5-5** in **Section 4.5**, the electricity demand for the proposed Project during normal operation would result in a net increase of 22,651,384 kWh (22.7 GWh) per year. In the event the MSF TPSS is unable to operate, the electricity demand for the proposed Project results in a net increase of 22,164,841 kWh (22.1 GWh) per year. In the event the Civic Center Site TPSS is unable to operate, the electricity demand for the proposed Project results in a net increase of 23,485,411 kWh (23.5 GWh) per year.

As shown in **Table 4.5-6** in **Section 4.5**, the proposed Project would result in a net decrease of 3,467,250 kBTU of natural gas per year.

As shown in **Table 4.5-8** in **Section 4.5**, implementation of the proposed Project would reduce annual petroleum-based fuel under all scenarios. Specifically, under the Adjusted Baseline (2016) scenario, the proposed Project would reduce annual fuel consumption from 48,954,790 gallons to 48,633,366 gallons, a decrease of 321,424 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.

Additionally, the proposed Project would include up to two stationary standby generators with an estimated total capacity rated at approximately 4,000 kilowatts (kW) to provide emergency power

primarily for lighting and other emergency building systems. The estimated annual fuel usage assuming each generator operates of 50 hours per year (2 hours per day) is 27,440 gallons of diesel fuel.<sup>3</sup>

Operation of the proposed Project would comply with all applicable building codes, including the 2019 Title 24 building energy efficiency standards, CAFE fuel economy standards, consistency with the SCAG 2020-45 RTP/SCS, compliance with the County's Low Impact Development (LID) Development Standards Manual, compliance with the City's Low Impact Development Requirements for New Development and Redevelopment, the City's Green Street Policy, the City's Water Conservation and Water Supply Shortage Program, as well as mitigation measures included in this Draft EIR, would ensure that natural resources are used efficiently and conserved to the maximum extent possible. Further, it is expected that, over time, new technologies or systems will emerge, or will become more cost-effective or user-friendly, to further reduce the reliance upon nonrenewable natural resources. For example, future implementation of the Clean Fuel Standard and the Renewable Portfolio Standard are expected to decrease the use of nonrenewable fossil fuels.

Collectively, the incorporation of the above described conservation measures and features, operation of the proposed Project would minimize the consumption of electricity, natural gas, and transportation fuels. Therefore, as proposed operation of the proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of electricity, natural gas, and transportation fuels, and thus would not result in the unjustified consumption of natural resources.

#### 6.4 EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the CEQA Guidelines<sup>4</sup> requires that an EIR "contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and therefore were not discussed in detail in the EIR."

The Original Initial Study (Original IS) (see **Appendix 2.0.2b**) was published in July 2018 and determined that an EIR would be prepared in compliance with CEQA to analyze potentially significant impacts that may result from the Project. As such, an Original Notice of Preparation (Original NOP) (see **Appendix 2.0.1b**) was circulated and comments were received from the public and agencies following a 30-day comment period that ended on August 15, 2018.

As a result of the comments received and refinements and modifications to proposed Project identified in the Original NOP and Original IS, a Revised NOP and IS were circulated. Subsequent to the circulation of

---

3 Vender Specifications for Standby Generator, Accessed August 25, 2020 at: [https://www.cat.com/en\\_US/products/new/power-systems/electric-power.html](https://www.cat.com/en_US/products/new/power-systems/electric-power.html)

4 California Environmental Quality Act (CEQA) Guidelines, Section 15128.

the Original IS, the State of California Office of Planning and Research (OPR) updated and revised the thresholds contained in the State CEQA Guidelines Appendix G.<sup>5</sup> The Revised IS was updated to address the updated Appendix G checklist that became effective on December 28, 2018. The following analysis is based on the Revised Initial Study (Revised IS) recirculated on September 10<sup>th</sup>, 2020 (see **Appendix 2.0.2a**).

Impacts determined by the Initial Study to be potentially significant, as well as included in this Draft EIR are addressed in detail in **Section 4.0: Environmental Impact Analysis**. The discussion below presents the analysis of the effects related to specific thresholds for the impacts identified in the Revised Initial Study that were not found to be significant. All impacts for the issues discussed in this section would be less than significant or have no impact.

### 6.4.1 Aesthetics

Except as provided in Public Resources Code Section 21099, would the Project:

**Threshold: Have a substantial adverse effect on a scenic vista?**

A significant impact regarding a scenic vista could occur if the proposed Project were to introduce incompatible visual elements within a field of view containing a scenic vista or substantially blocked views of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest). Scenic resources typically include natural open spaces, topographic formations, and landscapes that contribute to a high level of visual quality. They also can include ridgelines, parks, trails, nature preserves, sculpture gardens, and similar features.

The proposed Project consists of an elevated guideway that would be located in the center of the public rights-of-way. The proposed Project's alignment would extend from a point near the under-construction Metro Crenshaw/LAX Line, which will run south along North and South Market Street, east along East Manchester Avenue, and south along South Prairie Avenue before terminating near the intersection of South Prairie Avenue and Hardy Street.

The proposed Project is located entirely within the City in a highly developed urban area characterized by commercial, residential, and industrial uses. The existing level of development on the site and in the surrounding area limits views across and beyond the site from surrounding roadways. The City's General Plan states that no forest resources, wildlife, fisheries, shorelines, or agricultural land are present in the City,<sup>6</sup> nor does the General Plan designate any scenic vistas within the City or its vicinity. Additionally, the

---

5 California Environmental Quality Act (CEQA) Guidelines, Appendix G.

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

proposed Project is not near any designated wild or scenic rivers pursuant to the National Wild and Scenic Rivers System.<sup>7</sup> The nearest surrounding mountains, the Santa Monica Mountains, are more than 10 miles to the north.<sup>8</sup> No views of these mountains or of any other focal points or broad panoramic view corridors are available from public rights-of-way along the proposed Project.

Based on the above, the proposed Project would not have a substantial adverse effect on a scenic vista. Impacts would be less than significant.

**Threshold:                    Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?**

A significant impact would occur if the proposed Project were to substantially damage identified scenic resources bordered by or within the viewshed of a State-designated scenic highway.

There are no designated scenic highways near the proposed Project. In addition, although the City Municipal Code (IMC) has a tree protection ordinance that requires any street trees affected by project implementation be replaced at a 1:1 ratio, the appended tree inventory does not identify any federally or State-listed trees that would be affected by proposed Project's implementation. None of the trees inventoried is located within a State scenic highway. Historic buildings located in the vicinity of the proposed Project also do not fall within a State scenic highway, and no rock outcroppings are present on or near the proposed Project. As such, impacts would be less than significant.

## 6.4.2      Agricultural and Forestry Resources

Would the proposed Project:

**Threshold:                    Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?**

Significant impacts would occur if the proposed Project were to adversely impact Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The location of the proposed Project is surrounded by commercial, commercial recreation, single- and multifamily residential, and entertainment uses (within the Hollywood Park Specific Plan).

---

7 National Wild and Scenic Rivers System, accessed July 2020, <https://www.rivers.gov>.

8 Google Maps accessed July 2020, <https://www.google.com/maps>.

According to the California Department of Conservation's Farmland Mapping and Monitoring Program, the location of the proposed Project has not been previously mapped.<sup>7</sup> However, the City is highly developed and entirely urbanized; no portion of the City, including the proposed Project location and surrounding development, is currently in agricultural use. As such, no portion of the proposed Project's location would qualify for designation as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance. No impacts would occur.

**Threshold: Conflict with existing zoning for agricultural use, or Williamson Act contract?**

Significant impacts would occur if the proposed Project were to conflict with existing agricultural zoning or a Williamson Act contract.

As previously noted, the proposed Project's location and surrounding development are not used for agricultural, nor can they support agricultural use. The area is not subject to a Williamson Act contract. No impacts would occur.

**Threshold: Conflict with existing zoning for, or cause rezoning of, forestland (as defined in PRC section 12220(g)), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**

The proposed Project's location is not designated or zoned for forest or timberland. No timber operations exist in the area. Additionally, the area is highly urbanized area and is not within any forestland area. No impacts would occur.

**Threshold: Would the Project result in the loss of forest land or conversion of forest land to non-forest use?**

As previously noted, the proposed Project's location does not contain any farmland or forestland. Development of the proposed Project would occur in an existing highly urbanized and developed area. No impacts would occur.

**Threshold: Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to nonagricultural use, or conversion of forestland to nonforest use?**

The proposed Project's location is not designated or zoned for forest or timberland. No timber operations exist in the area. Additionally, the area is highly urbanized area and is not within any forestland area. No impacts would occur.

### 6.4.3 Air Quality

Would the proposed Project:

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

Impacts would be considered potentially significant if the proposed Project were to result in the creation of objectionable odors with the potential to affect substantial numbers of people, or if construction or operation of the proposed Project would result in the creation of nuisance odors that would be noxious to a substantial number of people as codified in South Coast Air Quality Management District (SCAQMD) Rule 402 (Nuisance).<sup>9</sup>

Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills.

During construction, activities associated with the operation of equipment, the application of asphalt, and the application of architectural coatings and other interior and exterior finishes may produce discernible odors typical of most construction sites. As construction-related emissions dissipate from the area, odors associated with these emissions would also decrease, dilute, and become unnoticeable.

According to the SCAQMD CEQA Air Quality Handbook, land uses that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting refineries, landfills, dairies, and fiberglass molding.<sup>10</sup> The proposed Project would not include any of these odor-producing uses. Odors associated with the proposed Project's operation would be limited to on-site waste generation and disposal, as well as cleaning operations at the MSF. All trash receptacles would be covered and properly maintained in a manner as to minimize odors, as required by City and Los Angeles County Health Department regulations and be emptied on a regular basis.<sup>11</sup>

Implementation of the proposed Project would not generate objectionable odors affecting a substantial number of people. Impacts related to odors would be less than significant.

---

9 SCAQMD, "Rule 402: Nuisance" (adopted May 7, 1976), <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule402.pdf>.

10 SCAQMD, Air Quality Handbook, accessed July 2020, <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis/handbook>.

11 County of Los Angeles Department of Public Health, "Solid Waste Management Program," accessed July 2020, [http://publichealth.lacounty.gov/eh/EP/solid\\_waste/solid\\_waste\\_main.htm](http://publichealth.lacounty.gov/eh/EP/solid_waste/solid_waste_main.htm).

#### 6.4.4 Biological Resources

Would the project:

**Threshold: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?**

A significant impact would occur if the proposed Project were to lead to adverse effects on any species identified as a candidate, sensitive, or special status species according to any adopted plan, policy, or regulation. This includes effects caused by habitat modification.

The proposed Project is located entirely within a highly developed urban area characterized by commercial and residential uses. The proposed Project's location consists of paved and active streets with various landscaping, as well as developed or previously developed parcels where the MSF and TPSS facilities may be located. The existing level of development in the area and in the surrounding area is not compatible with supporting wildlife and natural plant communities.

A biological assessment for the proposed Project's location was completed to determine the presence or absence of any sensitive biological resources. As part of the biological assessment, the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB)<sup>12</sup> was used to conduct a 9-quadrant survey. In the Inglewood quadrant, 29 species were previously identified as seen in **Table 6.0-1: CNDDB Inglewood Quadrant Species List**.

There were no species listed on the CNDDB that have been observed within the area of proposed Project. Fourteen of the species listed in **Table 6.0-1** were no closer than 1.89 miles from the proposed Project. The only plant species on site were landscaping as well as weeds and ruderal vegetation. Of these species, none listed is a candidate, sensitive, or special-status species. None of the species listed in the CNDDB was found to be present within or surrounding the proposed Project during the field survey on May 23, 2018.

---

12 California Department of Fish and Wildlife (CDFW), California Natural Diversity Database (CNDDDB), "Maps and Data," accessed July 2020, <https://www.wildlife.ca.gov/Data/CNDDB>.

**Table 6.0-1**  
**CNDDDB Inglewood Quadrant Species List**

Scientific Name	Common Name	Distance to Proposed Project (miles)
<i>Spea hammondii</i>	Western spadefoot	Unprocessed
<i>Nycticorax</i>	Black-crowned night heron	Unprocessed
<i>Ammodramus savannarum</i>	Grasshopper sparrow	Unprocessed
<i>Spizella breweri</i>	Brewer's sparrow	Unprocessed
<i>Agelaius tricolor</i>	Tricolored blackbird	3.06 SE
<i>Setophaga petechia</i>	Yellow warbler	Unprocessed
<i>Athene cunicularia</i>	Burrowing owl	4.19 NE
<i>Polioptila californica</i>	Coastal California gnatcatcher	2.01 NW
<i>Empidonax traillii extimus</i>	Southwestern willow flycatcher	4.19 NE
<i>Vireo bellii pusillus</i>	Least Bell's vireo	4.59 NE
<i>Bombus crotchii</i>	Crotch bumble bee	Not Present on-site
<i>Eumops perotis californicus</i>	Western mastiff bat	1.89 SE
<i>Nyctinomops femorosaccus</i>	Pocketed free-tailed bat	Unprocessed
<i>Microtus californicus stephensi</i>	South coast marsh vole	2.01 NW
<i>Taxidea taxus</i>	American badger	4.19 NE
<i>Lasionycteris noctivagans</i>	Silver-haired bat	Unprocessed
<i>Anniella stebbinsi</i>	Southern California legless lizard	Unprocessed
<i>Phrynosoma blainvillii</i>	Coast horned lizard	5.70 S
<i>Eryngium aristulatum var. parishii</i>	San Diego button-celery	2.12 SW
<i>Centromadia parryi ssp. australis</i>	Southern tarplant	Not Present on-site
<i>Lasthenia glabrata ssp. coulteri</i>	Coulter's goldfields	0.77 NE
<i>Atriplex coulteri</i>	Coulter's saltbush	4.44 SE
<i>Astragalus tener var. titi</i>	Coastal dunes milk-vetch	0.77 NE
<i>Sidalcea neomexicana</i>	Salt spring checkerbloom	3.07 NW
<i>Camissoniopsis lewisii</i>	Lewis' evening-primrose	Unprocessed
<i>Hordeum intercedens</i>	Vernal barley	Unprocessed
<i>Orcuttia californica</i>	California Orcutt grass	3.69 SW
<i>Navarretia fossalis</i>	Spreading navarretia	On site
<i>Navarretia prostrata</i>	Prostrate vernal pool navarretia	Not Present on-site

Source: CNDDDB

Notes: NE = Northeast; S = South; SE = Southeast; SW = Southwest; Unprocessed = Data for species has not been uploaded to CNDDDB for mapping—cannot determine distance.

The sensitive species listed in quadrants are not within the proposed Project's footprint. The species listed tend to only occur in specific habitats that do not present within the City; suitable habitats for these species tend to occur in area beyond the City, such as the Santa Monica Mountains to the northwest and

the coastal regions to the west. The proposed Project area is completely urbanized and has no natural open space natural plant communities.

The proposed Project is not located in a significant ecological area defined in the County of Los Angeles (the County) General Plan.<sup>13</sup> Moreover, the City's General Plan states that no forest resources, wildlife, fisheries, shorelines, or agricultural land are present in the City.<sup>14</sup>

Impacts would be less than significant.

**Threshold: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?**

Significant impacts would occur if the proposed Project were to cause adverse effects on any riparian habitat or other sensitive natural community identified in an adopted plans, policies or regulations.

The proposed Project is located in an area that consists of paved rights-of-way, as well as developed or previously developed urban parcels adjacent to the proposed Project. As such, no riparian habitat or sensitive natural community is located in the area.<sup>15</sup> In addition, the proposed Project is not located in a significant ecological area defined in the County's General Plan<sup>16</sup> or the City's General Plan.<sup>17</sup>

No impacts would occur.

**Threshold: Have a substantial adverse effect on State or federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

A significant impact would occur if the proposed Project were to adversely affect federally protected wetlands under Section 404 of the Clean Water Act.

The proposed Project is not in proximity to, nor does it contain, wetland habitat or a blue-line stream that is subject to the jurisdiction of the US Army Corps of Engineers or the CDFW. The National Wetlands

---

13 Los Angeles County, Department of Regional Planning (LA County DRP), General Plan 2035, "General Plan Update Program— Interactive Map (GP-NET)," accessed July 2020, <http://planning.lacounty.gov/gpnet>.

14 City of Inglewood, General Plan, "Conservation Element" (1997).

15 CDFW, CNDDDB, "Maps and Data."

16 LA County DRP, General Plan 2035, "General Plan Update Program—Interactive Map (GP-NET)."

17 City of Inglewood, General Plan, "Conservation Element."

Mapper does not show any federally protected streams, wetlands, or other water bodies, or any riparian habitat on site or adjacent to the proposed Project.<sup>18</sup>

Because the proposed Project would not have any effect on federally protected wetlands, and would not result in any removal, filling, hydrological interruption, or other means of disruption to a watercourse, no impact would occur.

**Threshold:** **Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan?**

Significant impacts would occur if the proposed Project were to conflict with a Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or another approved plan designed to conserve habitat.

No adopted HCP, NCCP, or similar plan applies to the proposed Project's area.<sup>19</sup> Consequently, implementation of the proposed Project would not conflict with the provisions of any adopted conservation plan and therefore no impacts would occur.

#### 6.4.5 Geology and Soils

Would the proposed Project:

**Threshold:** **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?**

Significant impacts would occur if the proposed Project were to expose people or structure to the effects of liquefaction.

Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: shallow groundwater; low-density, fine, clean sandy soils; and strong ground motion. The effects of liquefaction can include sand boils, settlement, and bearing-capacity failures below structural foundations.

---

18 US Fish and Wildlife Service (USFWS), National Wetlands Inventory, "National Wetlands Mapper," accessed July 2020, <https://www.fws.gov/wetlands/data/mapper.html>.

19 CDFW, "NCCP Plan Summaries," accessed July 2020, <https://www.wildlife.ca.gov/conservation/planning/nccp/plans>.

According to the CGS, the location of the proposed Project is not within an area susceptible to liquefaction.<sup>20</sup> Based on previous investigations and available geologic data, liquefaction zones are not mapped or known to exist beneath the proposed Project.

The following materials were consulted regarding potential liquefaction for the proposed Project:<sup>21</sup>

- Mapped liquefaction areas on the Inglewood Quadrangle,
- The City of Los Angeles Safety Element, and
- The County of Los Angeles Seismic Safety Element.

Based on a review of the above, it was determined that the proposed Project is not located within areas identified as having a potential for liquefaction according to these source materials. Furthermore, the regional geologic map and subsurface conditions reported in previous geotechnical investigations, and the absence of shallow groundwater, the Pleistocene age sediments underlying the proposed Project (generally dense silty sand and firm silty clay silts) are not considered prone to liquefaction. Therefore, the potential for liquefaction and its secondary effects are considered low and a Project area-specific study in accordance with the Seismic Hazards Mapping Act<sup>22</sup> will not be required. The design and construction of the proposed Project would conform to California Building Code requirements related to seismic standards, as approved by the City Building Safety Division.

Impacts related to seismic related liquefaction would be less than significant.

**Threshold:                      Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?**

Significant impacts would occur if the proposed Project were to expose people or structures to adverse impacts associated with landslides.

The proposed Project is located on level terrain. Based on the topographic setting and a review of previous geotechnical evaluations in the proposed Project's vicinity, no historical landslides are known to have occurred that could potentially impact the proposed Project. According to the CGS,<sup>23</sup> the proposed Project is not located within an Earthquake-Induced Landslide Zone as shown on the Earthquake Zones of Required Investigation, Inglewood Quadrangle map. The probability of seismically induced landslides

---

20 CDC, CGS, Earthquake Zones of Required Investigation, interactive map, accessed July 2020, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.

21 Inglewood Transit Connector, Technical Memorandum (DRAFT), Geology and Soils, Geosyntec Consultants, June 25, 2018.

22 2018 California Code, Public Resources Code – PRC, Division 2 – Geology, Mines and Mining, Chapter 7.8, Seismic Hazards Mapping, Section 2690, Seismic Hazards Mapping Act.

23 California Department of Conservation, California Geological Survey, DC, CGS, Earthquake Zones of Required Investigation.

occurring within the area of the proposed Project is not significant due to the general lack of elevation difference in slope geometry across or adjacent to the site. In addition, development of the proposed Project would not substantially alter the existing topography of the area.

As such, no impacts related to slope instability or landslides would occur.

**Threshold:                      Result in substantial soil erosion or the loss of topsoil?**

Significant impacts would occur if the proposed Project were to result in substantial soil erosion or the loss of topsoil.

The location of the proposed Project has been substantially developed with impermeable surfaces with only small areas of vegetative planters, and no areas of the site are susceptible to erosion under existing conditions. The area is highly urbanized and developed; the land is relatively flat and contains minimal rises or changes in elevation. No major slopes or bluffs are on or adjacent to the site. Although development of the proposed Project has the potential to result in the erosion of soils during construction activities, erosion would be reduced through implementation of SCAQMD Rule 403—Fugitive Dust to minimize wind- and waterborne erosion.

The proposed Project’s construction would temporarily expose on-site soils to surface water runoff. Compliance with construction-related best management practices (BMPs), as detailed in a Storm Water Pollution Prevention Plan (SWPPP), would control and minimize erosion and siltation. Appropriate erosion control BMPs may include but are not limited to silt fencing, fiber rolls, sand bag barriers, gravel bag berms, stabilized construction site entrances/exits, and any other practices laid out in the City’s Low-Impact Development (LID) Standards Manual.<sup>24</sup> Following construction activities, treated runoff would be directed into existing storm drains that receive surface water runoff under existing conditions, and runoff would not encounter unprotected soils.

Because the proposed Project is greater than 1 acre in size, the proposed Project will implement a SWPPP in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site specific SWPPP would be prepared prior to earthwork activities and would be implemented during the proposed Project’s construction. The SWPPP would include BMPs and erosion control measures to prevent pollution in stormwater discharge. Typical BMPs that could be used during construction include good housekeeping practices (e.g., street sweeping; proper waste disposal; vehicle and equipment maintenance; concrete washout area; materials storage; minimization of hazardous materials; proper

---

<sup>24</sup> IMC, ch. 10, Public Works, art. 16, LID Standards Manual, incorporated by reference.

handling and storage of hazardous materials; etc.) and erosion- and sediment-control measures (e.g., silt fences, fiber rolls, gravel bags, stormwater inlet protection, soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City.

The proposed Project's construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet-weather erosion control plan if construction occurs during the rainy season. Through compliance with these existing regulations, the proposed Project would not result in any significant impacts related to soil erosion during the construction phase.

During the proposed Project's operational phase, the proposed Project's surface areas would be developed with impervious surfaces, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. In addition, no native topsoil is present on the site because it has been previously disturbed and developed. Therefore, soil erosion impacts associated with construction and operation of the proposed Project would not occur, and soil erosion impacts would be less than significant.

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

Significant impacts would occur if the proposed Project were based on unstable soils that could result in landslides, lateral spreading, subsidence, liquefaction, or soil collapse.

Subsidence and ground collapse generally occur in areas with active groundwater withdrawal or petroleum production. The extraction of groundwater or petroleum from sedimentary source rocks can cause the permanent collapse of the pore space previously occupied by the removed fluid. The proposed Project does not involve the creation of new groundwater wells, nor are there active groundwater activities in the vicinity of the proposed Project.<sup>25</sup>

According to the California Energy Management Division (CalGEM) (formerly the Division of Gas and Geothermal Resources (DOGGR)), the area of the proposed Project is not located within the limits of any existing or former oil fields.<sup>26</sup> The area does not contain existing oil production wells, and no plugged or abandoned oil exploration wells are known to be located within the proposed Project area. The closest

---

25 Los Angeles County Public Works. Groundwater Wells. <https://dpw.lacounty.gov/general/wells/>. September 1, 2020.

26 California Division of Gas and Geothermal Resources (DOGGR), Well Finder, <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.32073/33.94064/15>. Accessed August 31, 2020.

known oil production well is located approximately 1,00 feet east of Prairie Avenue and is categorized as “idle.”<sup>27</sup> Therefore, while there is some history of oil extraction in the area, no oil extraction occurs or is known to have historically occurred within the area of the proposed Project.

Subsidence and ground collapse can also occur during dewatering activities. However, dewatering is not necessary for the proposed Project. US Geological Survey groundwater measurements indicate that nearby groundwater is at least 85 feet below grade. Given that the proposed Project does not include substantial excavation or subterranean structures, groundwater would not be encountered during construction. The proposed Project’s design features and construction would comply with all applicable building codes and standards.

A site-specific geotechnical study would be performed by a licensed engineer that would outline structural design elements to ensure structural integrity is maintained and account for site specific soil conditions. In addition, the design and construction of the proposed Project would conform to California Building Code requirements related to site specific soil conditions, as approved by the City Building Safety Division.

With adherence to existing regulations, impacts related to geological failure—including lateral spreading, off-site landslides, liquefaction, or collapse—would be less than significant.

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

Significant impacts could occur if the proposed Project were located on expansive soil that could create substantial risks to life or property.

Expansive soils include clay minerals characterized by their ability to undergo significant volume change (shrink or swell) due to variation in moisture content. Sandy soils are generally not expansive, while clayey soils generally are expansive. Changes in soil moisture content can result from rainfall, irrigation, pipeline leakage, perched groundwater, drought, or other factors. Volumetric change of expansive soil may cause excessive cracking and heaving of structures with shallow foundations, concrete slabs-on-grade, or pavements supported on these materials.

Soil materials in the area tend to include: (1) artificial fill, consisting primarily of silty sand and sand with silt and gravel; (2) alluvial deposits consisting of sand, gravel, and cobbles; and (3) alluvial deposits consisting of silty sand, sand, silty clay, and sandy clay. Typically, sandy soils have a low expansion potential

---

27 California Division of Gas and Geothermal Resources (DOGGR), Well Finder, <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.32073/33.94064/15>. Accessed August 31, 2020.

while clayey soils can have a high expansion potential. The predominance of granular content in the soils in the area including gravels, sands, and cobbles indicate a generally low potential for expansive soils.

A site-specific geotechnical study would be performed by a licensed engineer that would outline structural design elements to ensure structural integrity is maintained and account for site specific soil conditions. In addition, the design and construction of the proposed Project would conform to California Building Code requirements related to site specific soil conditions, as approved by the City Building Safety Division.

The proposed Project would incorporate standard construction practices to maintain the integrity of the proposed Project's structures. Additionally, the proposed Project's design features and construction would comply with all applicable building codes and standards. With adherence to existing regulations, impacts related to expansive soils would be less than significant.

**Threshold:                    Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

The proposed Project would result in significant impacts if it were located on soils incapable of supporting septic tanks or other alternative systems in the event that the proposed Project were not connected to existing sewer systems.

The proposed Project is located in a highly urbanized area where wastewater infrastructure is currently in place. The proposed Project would connect to the City's existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. Thus, the proposed Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.

No impacts would occur.

#### **6.4.6       Hazards and Hazardous Materials**

Would the proposed Project:

**Threshold:                    Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

#### ***Construction***

During construction activities, excavation of soil impacted with petroleum hydrocarbons or dry-cleaning solvents or other contaminants may be encountered. In addition, common construction materials, such

as fuels, paints, oils, transmission fluids, solvents, and other acidic and alkaline solutions, would be utilized. The potential encounter and usage of contaminants and hazardous materials would require special handling, transport, and disposal. Hazardous materials used during construction would typically be packaged in consumer quantities with handling instructions from the manufacturers. Manufacturer instructions will be followed during required usage of hazardous materials to minimize the risk of exposure to workers and the environment.

In addition, the construction of the MSF and TPSSs will necessitate the demolition of existing structures. Demolition activities have the potential to release hazardous materials, such as asbestos containing materials (ACM), lead-based paint (LBP), and other potentially hazardous building materials in some form such as polychlorinated biphenyl, mercury, or chlorofluorocarbons found in fluorescent lighting and electrical switches. Potential exposure to hazardous materials during demolition will be limited only to the duration of demolition activities. Prior to demolition, existing buildings are required to be inspected for the presence of hazardous materials, including asbestos containing materials, lead based paint, polychlorinated biphenyl (PCB) materials and mercury.

The identification, removal, and disposal of ACM is regulated under 8 CCR 1529 and 5208. The identification, removal, and disposal of LBP is regulated under 8 CCR 1532.1. A State-certified professional would be required to conduct all work related to the identification, removal, and disposal of both ACM and LBP. If either ACM or LBP are found, a site-specific hazard control plan must be prepared and submitted to the appropriate agency detailing removal methods and specific instructions for protective clothing and equipment for abatement personnel. A State-certified LBP and an asbestos removal contractor would be retained to conduct the appropriate abatement measures and be retained for the removal of the hazardous material in compliance with all federal, State, and local laws and regulations. Once all abatement measures have been implemented and the hazardous material has been removed, a written documentation will be submitted to the City.

The identification, removal, and disposal of PCBs is regulated by the EPA under the Toxic Substances Control Act<sup>28</sup> and 22 CCR 66263.44. Electrical transformers and older fluorescent light ballasts, along with other suspect material will need to be tested and verified for PCB content prior to demolition. If PCBs are detected above action levels, a material must be disposed of at a licensed facility permitted to accept the materials. The identification, removal, and disposal of PCBs must follow all federal, State, and local laws and regulations. Upon completion of abatement measures, the contractor will submit written documentation to the City.

---

28 Title 40, Chapter 1, Subchapter R, Part 761

All hazardous material identification, removal, and disposal activities will be carried out in accordance with all federal, State, and local laws and regulations in combination with enforcement mechanisms by agencies including SCAQMD and Cal/OSHA. Compliance with applicable laws and regulations will minimize the potential for exposure of individuals and the environment to hazards during the construction, demolition, and disposal process.

The transport of hazardous material is regulated by US Department of Transportation, Caltrans and the California Highway Patrol. The enforcement agencies have established driver-training requirements, load labeling requirements, and container specifications designed to minimize the exposure of hazardous materials. Manchester Boulevard and Prairie Avenue are major roadways along the elevated guideway that are designated truck routes.<sup>29</sup> These routes are permitted for use by any vehicle exceeding a maximum gross weight of 3 tons and includes the routine transport of hazardous materials by such trucks. While hazardous materials, with some exceptions, can be transported on all City roadways, Section 31303 of the California Vehicle Code and US Department of Transportation regulations require that hazardous materials be transported by routes with the least overall travel time, ensuring that freeways and major boulevards are primarily used for the transport of hazardous materials. Prior to the commencement of construction, haul routes will be reviewed and approved of by the City.

Additionally, the NPDES General Construction Permit described above in **Section 4.6: Geology and Soils**, would include the submittal of a SWPPP, identifying various BMPs and other measures, including proper material storage, prevention, and containment of accidental spills of hazardous materials and wastes, to ensure hazardous materials are contained. All materials will also be stored, handled, transported, and disposed of in accordance with all applicable local, State, and federal regulations. Therefore, the proposed Project would not create a significant impact related to routine transport, use, or disposal of hazardous materials during construction. Impacts would be less than significant.

### **Operation**

The types and amounts of hazardous materials that would be used in connection with operation of the proposed Project, including along the elevated guideway and at the stations, but particularly at the MSF, would be typical of those used in an industrial setting (e.g., cleaning solutions, solvents, pesticides for landscaping, painting supplies, and petroleum products used in normal vehicle fleet operations, coolants, absorbents, oil and fuel products, and machining wastes). All potentially hazardous materials would be used and stored in accordance with applicable federal, State, and local regulations, and the proposed Project would comply with planning and emergency response regulations pertaining to the presence of

---

29 IMC, ch. 3, Motor Vehicles and Traffic, art. 3, Truck Route Regulations, sec. 3-85, Truck Routes Established (1985).

such materials. The potential for a significant hazardous impact to occur during operation of the proposed Project is considered low. Impacts would be less than significant.

**Threshold:                    Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

Significant impacts would occur if the proposed Project were located on a site that is included on a list of hazardous materials sites.

California Government Code Section 65962.5 requires various State agencies, including but not limited to the Department of Toxic Substances Control (DTSC) and the State Water Resources Control Board (SWRCB), to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis.<sup>50</sup> The State of California maintains the Hazardous Waste and Substances Site List, also known as the Cortese List, as a planning document that assists Lead Agencies with CEQA compliance as it relates to hazardous materials and sites.

Section 65962.5(a)(1) requires that DTSC “shall compile and update as appropriate, but at least annually, and shall submit to the Secretary for Environmental Protection, a list of all the following: (1) [a]ll hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code (HSC).” The hazardous waste facilities, identified in HSC Section 25187.5, are those where DTSC has taken or contracted for corrective action because a facility owner/operator has failed to comply with a date for taking corrective action in an order issued under HSC Section 25187, or because DTSC determined that immediate corrective action was necessary to abate an imminent or substantial endangerment.

No portions of the of the proposed Project are currently on the active Cortese list of sites compiled pursuant to Government Code Section 65962.5. Any site that was within the area of the proposed Project areas that were previously on the Cortese list has been sufficiently remediated to meet DTSC, SWRCB, and other agency requirements, and no longer pose a significant hazard to the public and the environment. Therefore, impacts would be less than significant.

**Threshold:** For a project located within an airport land use plan or, where such plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the Project area?

A significant impact would occur if the proposed Project were located in an airport land use plan or within 2 miles of a public airport and would result in a safety hazard as a result of that location.

The proposed Project is not subject to the Los Angeles County Airport Land Use Plan, which was adopted in December 1991 and revised in December 2004. Los Angeles International Airport (LAX) is located more than 2 miles southwest of the proposed Project, and the Hawthorne Municipal Airport is located approximately 1.5 miles south of the proposed Project. The proposed Project is not located near a private airstrip.

Airport operation hazards include incompatible land uses or features such as power transmission lines, wildlife hazards, and tall structures that can interfere with aircraft operations. The proposed Project would not construct any buildings or structures to a height that would interfere with or obstruct any local airport operations. Therefore, impacts would be less than significant.

**Threshold:** Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Significant impacts would occur if the proposed Project were to expose people or structures to significant risks associated with wildland fires.

The City is highly developed and entirely urbanized and is without an urban/wildland interface. The proposed Project is not within a Moderate, High, or Very High Fire Hazard Severity Zone as designated by CAL FIRE. As such, the proposed Project would not increase or create the potential for wildland fires to occur near the proposed Project. No impacts would occur.

### 6.4.7 Hydrology and Water Quality

Would the proposed Project:

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

A significant impact would occur if project discharges (either urban or stormwater runoff) to surface water or groundwater were to violate the conditions of any of the guiding federal, State, regional, or local requirements.

#### **Construction**

During construction, the proposed Project could disturb areas that require development outside of the transportation rights-of-way, including excavation, site preparation, and infrastructure improvements. Removing existing pavement, importing/exporting soil, grading, and stockpiling could potentially result in soils being exposed, loosened, and transported by stormwater to downstream receiving waters. Additional pollutants, including oil and grease, metals, and pH-altering materials, may also be introduced to the receiving water(s) during the construction phase. However, to reduce the potential for the above impacts during the construction phase, the proposed Project will comply with the SWRCB Construction General Permit (CGP). Under the CGP, the proposed Project will prepare an approved SWPPP and implement construction BMPs. The CGP will be enforced through the City's construction, grading, and excavation permitting process.

Therefore, impacts related to water quality standards and waste discharge requirements during the construction phase would be less than significant.

#### **Operation**

The proposed Project's elevated guideway is located within existing transportation rights-of-way. The proposed Project component would be constructed on impervious surfaces. The proposed Project structures would also be constructed in compliance with the applicable City's and County's Municipal Separate Storm Sewer System (MS4) Permits and LID Ordinance requirements to address any potential pollutant or pollutant loading impacts.

The proposed MSF site has nearly fully impervious surfaces with the exception of a few landscape areas. The MSF site would be constructed in full compliance with the City's and County's MS4 Permits and LID Ordinance requirements to address any potential pollutant or pollutant loading impacts.

The proposed Project is located over the West Coast Basin, which is a confined aquifer, and is located approximately 220 ft below the ground surface. Urban and stormwater runoff infiltrated on site is unlikely to reach this groundwater aquifer. As a result, even if infiltration BMPs are incorporated into the proposed Project as required LID measures, such BMPs would extend to such a depth as to enter the basin. Therefore, infiltrated runoff would be unlikely to cause adverse impact to the local groundwater quality. Any potential impacts would be reduced to acceptable levels with implementation of infiltration BMPs.

Therefore, impacts related to surface water and groundwater quality standards and waste discharge requirements during both the construction and operations phases would be less than significant.

**Threshold:                   Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?**

A significant impact would occur if the proposed Project were to substantially deplete groundwater or interfere with groundwater recharge.

**Construction**

The proposed Project's water supply needs during the construction phase will be provided by the City's municipal system (MS4). There would be no impact on groundwater supplies during the construction phase of the proposed Project. Because the underlying water basin is a confined aquifer, and the water table is located approximately 50 to 200 feet below ground surface, dewatering is not anticipated during the construction phase.

Therefore, impacts related to groundwater supply depletion during the construction phase would be less than significant.

**Operation**

The proposed Project could result in increased demand of potable and nonpotable water from proposed Project operation and addition of commercial sites. The proposed Project's water supply during the operation phase will be provided by the City, which depends on a combination of extracted groundwater from City-owned wells and potable and nonpotable water purchased from WBMWD.

However, according to the City's 2015 Urban Water Management Plan Update (UWMP), the City cannot meet increased water demand through an increase in groundwater extraction due to limitations in water rights. Therefore, projected demands are anticipated to be met through a combination of conservation of

local surface water, imported water, graywater, stormwater capture, ocean desalination, and/or other nongroundwater sources.

Impacts related to groundwater supply depletion during the operation phase would be less than significant.

**Threshold:**                    **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site?**

- i.            **Result in substantial erosion or siltation on or off site;**
- ii.          **Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;**
- iii.        **Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or**
- iv.         **Impede or redirect flood flows?**

A significant impact could occur if the proposed Project were to substantially alter the drainage pattern of an existing stream or river such that substantial erosion or siltation would result.

**Construction**

No existing surface streams or rivers pass within the proposed Project’s extent. The nearest open channel is Centinela Creek, approximately 1.3 miles downstream of the proposed Project. In the existing condition, stormwater runoff is collected in curbs, gutters, and inlets, and conveyed through the storm drain network. No topographic changes are proposed as part of the proposed Project. If the construction phase of the proposed Project results in increased runoff or any modifications to existing drainage patterns, the existing stormwater facilities will be analyzed in the context of the proposed additional flow and upgraded if needed.

Activities during construction may expose and/or loosen soils, potentially resulting in erosion and topsoil loss. The average slopes of the proposed Project extents within the Ballona Creek and Dominguez Channel Watersheds were 0.5 and 0.9 percent, respectively. Because the slopes in the proposed Project extents are relatively flat, the majority of soil disturbance is expected to be related to importing and exporting of soil, grading, and stockpiling. All potential impacts related to these activities are expected to be reduced

to acceptable levels under the CGP-required SWPPP. The SWPPP will identify any potential sources of sedimentation during construction and detail required BMPs to reduce or eliminate erosion and/or any potential alterations to drainage patterns. BMPs may include silt fencing, fiber rolls, sand bag barriers, gravel bag berms, and/or stabilized construction site entrances/exits. A Qualified SWPPP Practitioner will ensure compliance with the SWPPP by conducting regular monitoring and inspections of construction activities.

Any storm drain upgrades required to address increases in peak flow or runoff volumes would be made as part of the proposed Project's drainage design. BMPs as required by the SWPPP and the MS4 Permit would preclude any additional sources of polluted runoff during both construction and operations.

Therefore, impacts related to the creation or contribution of runoff water exceeding the capacity of existing or planned stormwater drainage systems, or providing substantial additional sources of polluted runoff, during both the construction and operation phases would be less than significant.

No streams or rivers run within the proposed Project's location. The proposed Project does not propose any changes to existing drainage patterns. During construction, BMPs (required and monitored under the SWPPP) would be used to reduce the volume and velocity of stormwater runoff, thereby mitigating the potential for flooding due to construction. Any accumulated sediment observed during inspection of temporary BMPs or permanent stormwater network devices would be removed to prevent flooding. The proposed Project is located outside the 100-year Federal Emergency Management Agency (FEMA) flood hazard area.<sup>30</sup>

Impacts related to altering the existing drainage pattern of the proposed Project's structural and support facilities that would result in erosion or siltation during the construction phase would be less than significant.

### **Operation**

No topographic changes or altered drainage patterns are currently proposed as part of the proposed Project, and any increases in runoff would be handled through compliance with MS4 Permit requirements.

Surface drainage will continue to be collected via the storm drain network to be ultimately conveyed to Ballona Creek and Dominguez Channel. Should the proposed Project result in increased runoff or peak flows, the existing stormwater facilities will be analyzed in the context of the proposed additional flow and

---

30 County of Los Angeles, Department of Public Works, Flood Zone Determination Website, <http://dpw.lacounty.gov/floodzone/>.

upgraded if needed. In the proposed condition, stormwater runoff would not encounter unprotected soils within landscaped areas.

The proposed Project will not modify the existing drainage patterns and would address any increases in runoff through compliance with the MS4 Permits and upgrades to existing stormwater infrastructure, if needed.

Impacts related to altering the existing drainage pattern of the area of the proposed Project that would result in erosion or siltation during the operation phase would be less than significant.

**Threshold: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

A significant impact would occur if the proposed Project were located within an area susceptible to flooding because of the failure of a levee or dam. A significant impact could occur if the proposed Project were located in an area subject to inundation by seiche, tsunami, or mudflow. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, or lake. A tsunami is a sea wave produced by a significant undersea disturbance. Mudflows result from the down-slope movement of soil and/or rock under the influence of gravity.

***Construction and Operation***

The proposed Project is located within FEMA unshaded Zone X, which is defined as an area outside the 0.2 percent annual chance floodplain. Further, the proposed Project is outside of the floodplain of any nearby flood control channel (Centinela Creek and Dominguez Channel). Any increase in peak flow or runoff volumes in the proposed condition would be addressed through compliance with the MS4 Permit and drainage system upgrade as part of the proposed Project.

The proposed Project is not located in any established tsunami inundation area, liquefaction zone, or landslide zone. The proposed Project is at least 1.3 miles away from any open water feature and, therefore, would not be subjected to seiche events. As stated above, the proposed Project proposed is relatively flat within both the Ballona Creek and Dominguez Channel Watersheds, and it is not adjacent to any exposed or steep grades.

Therefore, the proposed Project would have no impact related to exposing people or structures to loss, injury, or death involving flooding during either the construction or operational phases.

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

***Construction***

Regular construction activities have the ability to result in the degradation of water quality, most noticeably from erosion and sedimentation. Loose sediment itself may degrade water quality and has the capacity to carry such pollutants as heavy metals, nutrients, pathogens oil and grease, and fuels. Additionally, construction may expose the proposed Project’s location and stormwater to trash, solvents, paint, etc. The CGP requires the implementation of BMPs to eliminate or reduce the discharge of pollutants in stormwater discharges and prohibits the discharge of nonstormwater from construction sites because these nonstormwater discharges are likely to carry pollutants to receiving waters. The BMPs detailed in the SWPPP will minimize potential for impacts from erosion and sedimentation during construction. The SWPPP will also detail use of BMPs to minimize the potential for spills of toxic or hazardous chemicals or substances into surface or ground waters.

Impacts related to otherwise substantially degrading water quality during the construction phase would be less than significant.

***Operation***

The Project will address proposed changes in land use, which often results in changes in pollutant contributions, through an analysis of the anticipated pollutant concentrations and loads under both the existing and proposed condition. Any projected increase in pollutant concentrations or loads will be addressed through compliance with the MS4 Permit, as well as site-specific BMPs to address any increases in pollutant concentrations or loads.

Impacts related to substantially degrading water quality during the operation phase would be less than significant.

### 6.4.8 Mineral Resources

Would the project:

**Threshold: Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State?**

Significant impacts would occur if the proposed Project’s implementation would result in the loss of availability of a known mineral resource.

The proposed Project is located within a Mineral Resources Zone 3 (MRZ-3), which is an area where significant mineral deposits cannot be evaluated based on current and available data.<sup>31</sup> The State of California has not classified or designated mineral resource zones within the area, and the Bureau of Land Management mineral potential maps also indicate no prospective valuable deposits.<sup>32</sup>

In addition, the proposed Project is located entirely within a highly developed urban area characterized by commercial, industrial, and residential land uses. No records exist with respect to the presence of valuable mineral resources within the proposed Project’s area or the immediate surrounding area, and no mining is currently taking place in the City.<sup>33</sup>

No impacts would occur.

**Threshold: Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

Significant impacts would occur if the proposed Project were to result in the loss of availability of a locally important mineral resource recovery site.

The proposed Project is located within MRZ-3 and, as such, information is not available to determine whether valuable mineral resources are deposited on site.

As mentioned above, the proposed Project is located entirely within a highly developed urban area characterized by commercial and residential uses and no mining operations are currently being conducted

---

31 CDC, Division of Mines and Geology, Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California: Part II—Los Angeles County (1994), Plate 1B, available at [ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR\\_94-14/OFR\\_94-14\\_Text.pdf](ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Text.pdf).

32 CDC, CGS, Mineral Lands Classification, data portal, accessed July 2020, <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>.

33 CDC, Division of Mines and Geology, Update of Mineral Land Classification of Portland Cement Concrete Aggregate, Plate 1B.

in the City. There are no records of valuable mineral resources within the proposed Project’s footprint or the immediate surrounding area.<sup>34</sup>

No impacts would occur.

### 6.4.9 Noise

Would the proposed Project:

**Threshold:** For a project within an airport land use plan or, where such a plan has not been adopted within 2 miles of a public airport or public use airport, would the Project expose people residing or working the Project area to excessive noise levels?

A significant impact would occur if the proposed Project were to expose people residing or working in the proposed Project area to excessive noise levels from a public airport or public use airport.

The Federal Aviation Administration (FAA) requires airports to prepare noise contour maps to assess the effects of aircraft noise to surrounding land uses. These maps can be used as an indicator of potential impacts. The closest airports to the proposed Project are the Hawthorne Municipal Airport (HHR), approximately 1.5 miles to the south, and Los Angeles International Airport (LAX), approximately 2 miles to the west of the proposed Project. Noise contours for the Hawthorne Municipal Airport remain confined within the runway of the airports and not within the proposed Project immediate area.<sup>35</sup>

The proposed Project is partially located within the Planning Boundary/Airport Influence Area for the LAX Airport, as designated within the Los Angeles County ALUP.<sup>36</sup> The proposed Project falls within the Airport Influence Area and Airport Compatibility Zone for LAX for the southern LAX runway. Portions of the proposed Project are within the 65 dBA CNEL noise contour. This includes a portion of the proposed Project located within street rights-of-way on E. Manchester Boulevard and Prairie Avenue. The proposed Project is not considered a noise sensitive use in and of itself; therefore, noise associated with LAX would not create any impacts. Further, according to the Los Angeles World Airports’ Noise Contour Map for the first

---

34 LA County DRP, General Plan 2035, “General Plan Update Program—Interactive Map (GP-NET).”

35 LA County DRP, Hawthorne Airport: Airport Influence Area (May 13, 2003), [http://planning.lacounty.gov/assets/upl/project/aluc\\_airport-hawthorne.pdf](http://planning.lacounty.gov/assets/upl/project/aluc_airport-hawthorne.pdf).

36 Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, adopted December 1991, <http://planning.lacounty.gov/view/alup/>

quarter of 2018, the proposed Project is not located within noise contours associated with LAX as determined by studies by Los Angeles World Airports.<sup>37</sup>

Therefore, the proposed Project would not expose people to excessive noise levels associated with airport uses. As such, impacts would be less than significant, and

#### 6.4.10 Population, Employment, and Housing

Would the proposed Project:

**Threshold:** **Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

A significant impact would occur if the proposed Project were to displace substantial numbers of existing housing. The proposed Project would be constructed entirely within the existing public rights-of-way along City streets except for the MSF and the TPSSs. These features would be built on sites that are either currently vacant or being used for commercial or industrial purposes. As such, no housing would be displaced because of the proposed Project's implementation, and no impacts would occur. As noted above, portions of the proposed Project would be constructed and operated in areas that are proximate to residential uses. The proposed Project's elevated guideway and stations would be constructed almost entirely within existing public rights-of-way along existing City streets. The potential sites for the MSF and TPSS facilities are either vacant or are currently occupied by nonresidential uses. The EIR will address whether the proposed Project may have an indirect effect on these uses as a result of noise or vibration.

In addition, the proposed Project is consistent with the City's General Plan and Downtown TOD Plan and will assist the City is achieving the goals of these plans by supporting economic development in areas located along the proposed alignment by providing an additional transit option and reducing congestion on streets throughout the City. The existing number of travel lanes and traffic capacity of these streets will be maintained. Access and circulation to existing businesses and residences located along the proposed alignment will be maintained at all times during construction and the ITC Construction Commitment Program includes program to support local businesses during construction including the provision of funding for temporary signage and advertising during construction to help businesses affected by construction.

---

37 Los Angeles World Airports, "Quarterly Noise Reports and Contour Maps," <https://www.lawa.org/en/lawaenvironment/noise-management/lawa-noise-management-lax/quarterly-noise-reports-and-contour-maps>.

The APM guideway and stations will be located within the public right of way and designed in accordance with the ITC Design Guidelines to ensure the Project is integrated into the streets it is located on in a complementary manner. For these reasons, it is not expected that the project will result in business closures or vacancies. If any commercial property vacancies occur along the proposed alignment, these vacancies are expected to be short term and would not result in changes to the character of the community that would result in physical impacts to the environment that would be significant.

**6.4.11 Public Services**

**Threshold:** **Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:**

**i) Fire protection?**

The proposed Project would have a significant impact on fire protection if it were to require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. Services include fire suppression; hazardous materials protection; emergency medical treatment, including basic and advanced life support transportation; earthquake and fire safety planning; fire inspections; and building plan reviews.

The City is served by Battalion 20 within Division 6 of LACFD. Battalion 20 operates six stations in total; four of these serve the City (Fire Stations 170, 171, 172, and 173). Fire Station 171 is located approximately 0.25 miles west of the proposed Project at 141 W. Regent Street; Station 172 is approximately 0.7 miles north at 810 Centinela Avenue; Station 173 is approximately 1 mile east at 9001 S. Crenshaw Boulevard; and Station 170 is approximately 1.1 miles southeast at 10701 S. Crenshaw Boulevard. The stations are staffed in three rotating shifts (A, B, and C). A three-platoon schedule is based on 24-hour shifts that start at 8 AM. Standard company staffing is generally a minimum of 25 personnel per shift. An assistant deputy chief oversees each of the three divisions.

Although the proposed Project would help accommodate large numbers of persons attending events at adjacent sports and entertainment venues, these people would likely be in the proposed Project’s vicinity due to events at LASED or proposed IBEC. The reduction in vehicle traffic that would directly result from the proposed Project’s implementation could potentially reduce the amount of fire services required in

the area. Therefore, implementation of the proposed Project would not represent an increase in the need for these services.

Impacts would be less than significant.

**ii) Police protection?**

The proposed Project would have a significant impact on police protection services if it were to require expanded police services in the area as a result of the proposed Project's implementation.

Law enforcement services in the City are provided by the Inglewood Police Department (IPD). IPD operates one police station that houses most of the department's offices, located adjacent to Inglewood City Hall at One Manchester Boulevard. The Office of the Chief of Police, the Patrol Bureau, the Detective Bureau, the Records Division, the Custody Division, and the pistol range are all located at the police station. The Communications Division is located in the basement of the station, known as the Emergency Operations Center. The offices for the Traffic Division, the Training Section, and the Personnel Section are located on the second floor of the City Hall Building. IPD has 186 sworn officers and approximately 92 civilian personnel. The department comprises three major offices: Administrative Services, Criminal Investigative Services, and Patrol Services.

Although the proposed Project would help accommodate large numbers of persons attending events at adjacent sports and entertainment venues associated with LASED and proposed IBEC, these people would likely be in the proposed Project's vicinity regardless of the proposed Project's implementation. The proposed Project would provide an alternative mode of transit for persons attending such events but would not result in greater attendance than would otherwise be expected to occur. Because the proposed Project would divert some attendees who would otherwise travel by private vehicle, the proposed Project will reduce vehicle traffic. The reduction in surface vehicle traffic could potentially reduce the amount of police services required in the area. Therefore, the implementation of the proposed Project would not increase the need for police services.

Impacts would be less than significant, and

**iii) Schools?**

Significant impacts would occur if the Project were to necessitate the construction or expansion of schools in the proposed Project's area.

The proposed Project would not result in an increase in the number of residents; thus, there would be no increase in demand for school facilities. Because the proposed Project will primarily serve to accommodate

persons attending one-day events at adjacent sports and entertainment venues, the construction or expansion of schools would not be required because of the proposed Project's implementation.

No impacts would occur.

**iv) Parks?**

Significant impacts would occur if the proposed Project were to result in a need for new or expanded parks facilities.

The proposed Project would not result in an increase in the number of residents; thus, there would be no increase in demand for parks and recreational facilities. Because the proposed Project will primarily serve to accommodate persons attending one-day events at adjacent sports and entertainment venues, the construction or expansion of parks or recreational facilities would not be required because of the proposed Project's implementation.

No impacts would occur.

**v) Other public services?**

Significant impacts would occur if the proposed Project were to result in an increased need in public services other than those described above.

The proposed Project would not result in an increase in the number of residents; thus, there would be no increase in demand for other public services such as libraries. Because the Project will primarily serve to accommodate persons attending one-day events at adjacent sports and entertainment venues, the construction or expansion of library facilities would not be required because of the proposed Project's implementation.

No impacts would occur.

**6.4.12 Recreation**

Would the project:

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

Significant impacts would occur if the proposed Project were to result in an increased use of existing recreational facilities such that these facilities would need to be expanded or new ones constructed.

The proposed Project would primarily serve special events at the existing, under-construction, and proposed sports and entertainment venues associated with LASED. As such, most of ridership would use the proposed Project for events at those facilities and would not visit existing neighborhood or regional parks. In addition, weekday commuter ridership on nonevent days would not increase the use of neighborhood and regional parks.

No impacts would occur.

**Threshold:**                    **Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?**

Significant impacts would occur if the proposed Project were to include recreational facilities or required the expansion or construction of existing residential facilities.

The proposed Project does not include recreational facilities. Because it will primarily serve to accommodate persons attending one-day events at adjacent sports and entertainment venues, the construction or expansion of recreational facilities would not be required because of the proposed Project's implementation.

### **6.4.13            Utilities and Service Systems**

Would the proposed Project:

**Threshold:**                    **Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?**

A significant impact could occur if a project were to increase water consumption to such a degree that new water sources would need to be identified.

Water supply to the City is provided through WBMWD and the West Coast Groundwater Basin via City wells.<sup>38</sup> The City's UWMP concludes that Inglewood has sufficient existing water supplies so that a nonwater-intensive project, such as the one proposed, would not result in a strain on existing water supplies. Because water supplies in the proposed Project area are more than sufficient, impacts would be less than significant, and

---

38 City of Inglewood, Final Draft 2015 Urban Water Management Plan, <https://www.cityofinglewood.org/DocumentCenter/View/1061/2015-Urban-Water-Management-Plan-PDF?bidId=>.

**Threshold:**                    **Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project’s projected demand in addition to the provider’s existing commitments?**

A significant impact would occur if a project were to increase water consumption or wastewater generation to such a degree that the capacity of the existing facilities would be exceeded.

Water is provided to the proposed Project via WBMWD as well as City-owned wells. Wastewater generated by the proposed Project would be treated at the JWPCP.

Development of the proposed Project would not significantly increase the demand for water and wastewater treatment services within the City. The APM trains are electrified systems; the operation of the trains would not require significant water resources because none of its constituent components is water dependent. In addition, activities at the MSF and TPSS sites would not require additional water demands such that existing facilities would need expansion or new facilities constructed. The routine maintenance and storage of parts of the APM trains at the MSF would not require significant amounts of water except for train washing. Activities that would take place at the MSF includes service activities to the APM train cars, vehicle storage, loading platforms, and a paint booth. Although water and wastewater lines may need to be relocated, no aspect of the construction or operation of the proposed Project would require new or expanded water or wastewater treatment facilities.

Impacts would be less than significant

**Threshold:**                    **Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

A significant impact would occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste.

Solid waste services in the City are provided by Consolidated Disposal Service (CDS); trash collected in the City is taken to CDS’s American Waste Transfer Station in the City of Gardena, where it is sorted; residual garbage is taken to the Consolidated Volume Transport Disposal and Recycling Center (CVT) in the City of Anaheim, and recycling and green waste is taken to CDS’s Compton Transfer Station in the City of Compton.<sup>66</sup> Solid waste generated in the City is ultimately disposed of at various landfill facilities located throughout Los Angeles County.

The proposed Project would generate additional solid waste from construction debris, activities, and site preparation, as well as during operation of the proposed Project. Solid waste generated during construction and operation of the proposed Project would have to be separated and recycled. As described in Los Angeles County's most recent landfill disposal capacity report, a shortfall in permitted solid waste disposal capacity within the County is not anticipated to occur under forecasted growth and ongoing municipal efforts at waste reduction and diversion. The proposed Project would not drastically change the amount of solid waste disposal projected by the County due to the fact that the operations phase would generate minimal waste. Impacts would be less than significant, and

**Threshold: Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?**

A significant impact would occur if a project were to generate solid waste that was not disposed of in accordance with applicable regulations.

Assembly Bill (AB) 939 requires every city and county to divert 50 percent of its waste from landfills by the year 2000 through such means as recycling, source reduction, and composting.<sup>39</sup> In addition, AB 939 requires each county to prepare a countywide siting element for a 15-year period, specifying areas for transformation or disposal sites to provide capacity for solid waste generated in the county that cannot be reduced or recycled. Further, AB 1327, the California Solid Waste Reuse and Recycling Access Act of 1991, requires local agencies to adopt ordinances mandating the use of recyclable materials in development projects.<sup>40</sup>

The proposed Project would generate solid waste during both construction and operation that is typical of the development of a mechanical transportation system and industrial uses. This includes typical construction waste such as wood, concrete, and asphalt, as well as operational waste such as that collected from pedestrians and employees.

The proposed Project would fully comply with all federal, State, and local statutes and regulations regarding proper disposal. Impacts would therefore be less than significant.

---

39 CalRecycle, "Assembly Bill 939," accessed July 2020, <http://www.calrecycle.ca.gov/laws/legislation/calhist/1985to1989.htm>.

40 CalRecycle, "Ordinances, Resolutions, and Policies," accessed July 2020, <http://www.calrecycle.ca.gov/LGCentral/Library/LocalDocs/Policy.htm>.

### 6.4.14 Wildfire

If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:

**Threshold:**                    **Substantially impair an adopted emergency response plan or emergency evacuation plan?**

Significant impacts would occur if the proposed Project were to impair the implementation of an adopted emergency response or emergency evacuation plan.

The City is located in a fully developed urban area that is not associated with wildland fires. According to the Fire Hazard Severity Zone mapping done by the California Department of Forestry and Fire Protection, the proposed Project is located in an incorporated city that is considered to be in the Non Very High Fire Hazard Safety Zone (non-VHFHSZ).<sup>41</sup> The City is responsible for fire protection in the area, which is implemented in part by enforcement of the Fire Code requirements contained within the Building Code, as well as fire protection services provided by the City Fire Department.

As described in **Section 4.8: Hazards and Hazardous Materials**, the proposed Project is located largely within public rights-of-way. For this reason, construction activities associated with the proposed Project would likely cause the closure of travel lanes in streets along the elevated guideway. The City has planned evacuation routes that assume worst-case displacement and surface rupture from a seismic event in the region along the Newport-Inglewood Fault or Potrero Fault, as described in the Safety Element of the City's General Plan.<sup>42</sup>

However, the closure of lanes would be temporary and such closures would only be associated with the construction phase of the proposed Project. A Traffic Management Plan will be prepared to ensure that interference with area traffic is minimized. This would include ensuring that routes to the emergency room at the adjacent Centinela Hospital Medical Center would be maintained. The plan will require that emergency access be maintained throughout the proposed Project's construction. Therefore, the proposed Project's impacts on emergency response or evacuation plans would be less than significant.

---

41 California Department of Forestry and Fire Protection, 2011. Fire and Resource Assessment Program. Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Los Angeles County.

42 City of Inglewood, General Plan (adopted July 1995).

**Threshold: Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

Significant impacts would occur if the proposed Project were to exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors.

The City is a fully developed urban area that is not associated with wildland fires. As mentioned previously, the proposed Project is located in an area considered to be non-VHFHSZ.<sup>43</sup> The City is responsible for fire protection in the area, which is implemented in part by enforcement of Fire Code requirements contained within the Building Code, as well as fire protection services provided by the City Fire Department.

As described in **Section 4.7**, the proposed Project is located on level terrain. Based on the topographic setting and a review of previous geotechnical evaluations in the proposed Project's vicinity, no historical landslides are known to have occurred that could potentially impact the proposed Project. The nearest surrounding mountains, the Santa Monica Mountains, are more than 10 miles to the north.<sup>44</sup>

According to the CGS,<sup>45</sup> the proposed Project is not located within an Earthquake-Induced Landslide Zone as shown on the Earthquake Zones of Required Investigation, Inglewood Quadrangle map. The probability of seismically induced landslides occurring within the area of the proposed Project is not significant due to the general lack of elevation difference in slope geometry across or adjacent to the site. In addition, development of the proposed Project would not substantially alter the existing topography of the area.

Therefore, the proposed Project's impacts on exacerbation of wildfire risks, and thereby exposure of Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would be less than significant due to slope, prevailing winds, and other factors.

---

43 California Department of Forestry and Fire Protection, 2011. Fire and Resource Assessment Program. Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Los Angeles County.

44 Google Maps accessed July 2020, <https://www.google.com/maps>.

45 CDC, CGS, Earthquake Zones of Required Investigation.

**Threshold:                    Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

Significant impacts would occur if the proposed Project were to require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

As discussed above in **Section 4.14: Utilities and Service Systems**, the proposed Project will require utility systems improvements, upgrades and possible relocations to accommodate and serve the various project related components. The design and construction of the proposed Project’s elevated guideway structures, stations and support facilities will avoid existing utility and other infrastructure to the degree possible. In addition to surface improvements, some utility infrastructure that cannot be avoided may need to be relocated to accommodate the guideway columns and foundations. As mentioned above, the City is a fully developed urban area that is not associated with wildland fires. According to the Fire Hazard Severity Zone mapping done by the California Department of Forestry and Fire Protection, the proposed Project is located in an incorporated city that is considered to be non-VHFHSZ.<sup>46</sup> The City is responsible for fire protection in the area, which is implemented in part by enforcement of Fire Code requirements contained within the Building Code, as well as fire protection services provided by the City Fire Department. With adherence to Fire Code requirements contained within the Building Code and implementation of fire protection services provided by the City Fire Department, any potential infrastructure-induced fire risk or ongoing environmental impacts would be less than significant.

**Threshold:                    Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

Significant impacts would occur if the proposed Project were to expose people or structures to impacts associated with downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. The City is a fully developed urban area that is not associated with wildland fires. According to the Fire Hazard Severity Zone mapping done by the California Department of Forestry and Fire Protection, the proposed Project is located in an incorporated city that is considered to be non-

---

46 California Department of Forestry and Fire Protection, 2011. Fire and Resource Assessment Program. Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Los Angeles County.

VHFHSZ.<sup>47</sup> The City is responsible for fire protection in the area, which is implemented in part by enforcement of Fire Code requirements contained within the Building Code, as well as fire protection services provided by the City Fire Department.

As discussed in **Section 4.7**, the proposed Project is located on level terrain. Based on the topographic setting and a review of previous geotechnical evaluations in the proposed Project's vicinity, no historical landslides are known to have occurred that could potentially impact the proposed Project.

According to the CGS,<sup>48</sup> the proposed Project is not located within an Earthquake-Induced Landslide Zone as shown on the Earthquake Zones of Required Investigation, Inglewood Quadrangle map. The probability of seismically induced landslides occurring within the area of the proposed Project is not significant due to the general lack of elevation difference in slope geometry across or adjacent to the site. In addition, development of the Project would not substantially alter the existing topography of the area.

No streams or rivers run within the proposed Project's location., nor does it propose any changes to existing drainage patterns. During construction, BMPs (required and monitored under the SWPPP) would be used to reduce the volume and velocity of stormwater runoff, thereby mitigating the potential for flooding due to construction. Any accumulated sediment observed during inspection of temporary BMPs or permanent stormwater network devices would be removed to prevent flooding. The proposed Project is located outside the 100-year Federal Emergency Management Agency (FEMA) flood hazard area.<sup>49</sup> No topographic changes or altered drainage patterns are currently proposed as part of the proposed Project, and any increases in runoff would be handled through compliance with MS4 Permit requirements during operation.

As such, no impacts associated with downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes would occur.

## 6.5 GROWTH INDUCING EFFECTS

As required CEQA Guidelines section 15126.2(e),<sup>50</sup> an EIR must discuss ways in which a project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Also, an EIR must discuss the characteristics of a project that could

---

47 California Department of Forestry and Fire Protection, 2011. Fire and Resource Assessment Program. Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Los Angeles County.

48 California Department of Forestry and Fire Protection, 2011. Fire and Resource Assessment Program. Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Los Angeles County.

49 County of Los Angeles, Department of Public Works, Flood Zone Determination Website, <http://dpw.lacounty.gov/floodzone/>.

50 CEQA Guidelines sections 15126.2(e).

encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Growth can be induced in a number of ways, such as through the elimination of obstacles to growth, through the stimulation of economic activity within the region, or through the establishment of policies or other precedents that directly or indirectly encourage additional growth. The purpose of this section is to evaluate the potential growth-inducing effects resulting from the implementation of the proposed Project in the greater Los Angeles area. Additional analysis of the effects of the proposed Project on population and employment growth is provided in **Section 4.11: Population, Employment, and Housing**.

In general, a project may foster spatial, economic, or population growth in a geographic area if the project removes an impediment to growth (e.g., the establishment of an essential public service, the provision of the new access to or infrastructure capacity that serves an area; a change in zoning or general plan designations that increase density for areas outside the boundaries of a project site); or indirectly stimulates economic expansion or growth that occurs in an area in response to the project (e.g., changes in revenue base, employment expansion, etc.). These circumstances are further described below:

- **Elimination of Obstacles to Growth:** This refers to the potential for a project to remove infrastructure limitations or provide infrastructure capacity, or remove regulatory constraints that could result in growth unforeseen at the time of project approval; and
- **Economic Effects:** This refers to the potential for a project to cause increased activity in the local or regional economy. Economic effects can include such effects as the Multiplier Effect. A “multiplier” is an economic term used to describe inter-relationships among various sectors of the economy. The Multiplier Effect provides a quantitative description of the direct employment effect of a project, as well as indirect and induced employment growth. The multiplier effect recognizes that the on-site employment and population growth of each project may not be the complete picture of growth caused by the project.

## **Elimination of Obstacles to Growth**

The elimination of physical obstacles to growth is considered a growth-inducing effect. The proposed Project is located in a highly urbanized area in the vicinity of other facilities designed to accommodate large sporting and entertainment events. Common factors that limit growth include limited capacities of local or regional utility infrastructure, such as storm drainage systems, or wastewater conveyance and treatment systems. Transportation infrastructure can also be a factor that limits growth.

The proposed Project is located within a fully urbanized landscape, with extensive transportation and utility infrastructure designed to accommodate urban development in the City and the larger South Bay region.

## Economic Effects

**Section 4.11, Population, Employment, and Housing** describes potential employment of the proposed Project. The proposed Project is anticipated to have a total direct employment of up to 150 full-time equivalent people. This would include workforce requirements for the operation and maintenance necessary for the proposed Project, including system engineers, operators, maintenance personnel, janitorial crews, security, and other jobs. These jobs would extend beyond construction and into oversight of long-term operations.

Additionally, the proposed Project will provide funding for the support and transition of jobs through the California Climate Investments which facilitate GHG emission reductions and deliver a suite of economic, environmental, and public health co-benefits, including job co-benefits. Approximately 11,516 jobs will be benefitted through these funds and programs. Estimated jobs supported by the California Climate Investments through the proposed Project can be found in the **Table 4.11-8**.

The proposed Project would replace certain existing uses in order to accommodate for various project components (guideway, stations, and MSF). Existing sites to be replaced include the commercial/retail center (CVS plaza) at the northeast corner of Regent Street and Market Street that would be removed for the Market Street/Florence Avenue station, the commercial uses at 500 and 510 Manchester Boulevard (retail plaza) that would be removed for the proposed MSF, and the commercial building (Hat Store) that would be removed to allow for the encroachment of the guideway at 150 S. Market Street. The existing work force for these uses include:

- The CVS plaza at Market Street and Florence Avenue with an estimated 284 workers employed at the various commercial and retail uses.
- The commercial use at 150 S. Market Street (Hat Store) with an estimated 37 workers; and
- Existing businesses at the commercial center at 500 and 510 Manchester Boulevard (grocery store, café, gym, bank, and a gas station) which have a combined estimated workforce of 172 workers.<sup>51</sup>

In total, the existing businesses within the footprint of the proposed Project employ approximately 493 workers (for existing employment details refer to **Table 4.11-6**).

The proposed Project would generate approximately 150 full-time jobs for the operation and maintenance of the APM trains and will either directly or indirectly benefit 11,516 jobs. This results in a net support for

---

51 Number of employees generated by each commercial plaza area are calculated using the square footage of the facilities multiplied by a set factor. The factor used is 2.2371 employees per 1,000 SF, which is found in Inglewood Unified School District's Commercial Fee Justification Study 2018. The report can be located at: [https://www.lbschools.net/Asset/Files/Business\\_Services/Developer\\_Fees/2018/2018-Commercial-Fee-Justification-Study.pdf](https://www.lbschools.net/Asset/Files/Business_Services/Developer_Fees/2018/2018-Commercial-Fee-Justification-Study.pdf). Accessed July 22, 2020. It is important to note that land areas and number of employees are rounded numbers used for estimates for analysis purposes only.

approximately 11,173<sup>52</sup> jobs with the implementation of the proposed Project. Furthermore, ongoing and proposed developments along the elevated guideway would also benefit from the implementation of the proposed Project. Nearby projects such as the Hollywood Park Specific Plan (HPSP) and the Los Angeles Sports and Entertainment District (LASED) would also provide additional jobs and employment opportunities. The HPSP is projected to generate approximately 517 net new jobs<sup>53</sup> while the IBEC is projected to generate 833 net new jobs,<sup>54</sup> resulting in a combined 1,350 net new jobs from adjacent projects. Since jobs supported by the implementation of the proposed Project does not directly correlate to the number of new jobs created, the number of jobs created does not directly correlate to population growth within the area.

As previously discussed, approximately 92 percent of the residents in the City currently commutes to work outside of the City, with the remaining 8 percent of residents working within the City (**Table 4.11-5**). This pattern points to a regional spread in work locations for the City residents. Because of this, local fluctuations in job generation is unlikely to directly impact population growth within the City. Even though the proposed Project will either directly or indirectly support 11,173 jobs, the implementation of the proposed Project will only directly create 150 full-time equivalent jobs. Therefore, not all jobs supported by the proposed Project will translate into an increase in population growth for the local area or the region.

Additionally, according to SCAG 2020-2045 RTP/SCS, approximately 8,389,000 jobs were available in 2016 across industries in the region and the number of jobs available will increase to 10,050,000 by 2045, an increase of approximately 0.62 percent or approximately 52,700 annually in jobs.<sup>55</sup> Similarly, SCAG projects the population in the region will increase from approximately 18,832,418 in 2016 to 22,507,188 in 2045, resulting in an increase of approximately 0.61 percent or approximately 115,290 population annually. The proposed Project will provide benefits to approximately 0.14 percent of the jobs in the region based on the 2016 jobs number or approximately 23 percent of new jobs added to the region annually. The jobs that will be supported by the proposed Project in the region is within the regional trends provided by the SCAG 2020-2045 RTP/SCS data and the jobs that will benefit from the proposed Project does not directly translate into population growth.

---

52 11,516 minus 493 in numbers of jobs displaced.

53 Hollywood Park Specific Plan. "Introduction Executive Summary." <https://www.cityofinglewood.org/DocumentCenter/View/125/I-Introduction-Execitive-Summary-PDF>. Accessed July 27, 2020.

54 City of Inglewood. Summary. <https://www.cityofinglewood.org/DocumentCenter/View/13888/03-Summary>. Accessed July 27, 2020.

55 SCAG. 2020-2045 ConnectSoCal Demographics and Growth Forecast. [https://www.connectsocial.org/Documents/Draft/dConnectSoCal\\_Demographics-And-Growth-Forecast.pdf](https://www.connectsocial.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf). Accessed July 27, 2020.

As a result of this analysis, the proposed Project will not substantially induce population growth beyond the regionally projected value. Therefore, there is a less than significant impact on employment and population growth from the operation of the proposed Project.

## Environmental Effects of Induced Growth

The proposed Project's is a transit system that spans the length of approximately 1.6 miles and would be located near existing residential, office, retail, and commercial land uses which generate vehicle trips on local roadways within the City. The proposed Project would provide direct connections between regional transit provided by Metro, specifically at the Crenshaw/LAX line, and other transit providers as well as the City's major activity centers, such as The Forum, the LASED and HPSP. Implementation of the proposed Project would provide an alternate mode of transportation within the City and decrease vehicle ridership and thereby resulting in a corresponding decrease in VMTs.

The proposed Project would be designed to accommodate a projected demand of approximately 9,600 travelers during the peak hour in each direction for special-events service, which occurs during a three event night.<sup>56</sup> In addition, the operations to serve the normal weekday peak-hour ridership outlined in the Lea+Elliott Report would be approximately 441 pedestrians per hour per direction (pphpd). At 2.1 minutes headway, the system capacity is approximately 11,500 pphpd. **Table 4.2-8** shows the projected ridership numbers for the proposed Project.

VMT estimates are derived from the Traffic Study (see **Appendix 4.12.1**) and are shown in **Table 4.2-9** for the six operational scenarios with and without the proposed Project. As shown, the proposed Project daily and annual VMT are less than the daily and annual VMT without the proposed Project. Implementation of the proposed Project would increase transit mode split, reduce vehicle trips, and reduce VMT accordingly.

The proposed Project will help manage and support the City's projected growth by providing transit within a safe and accessible walking distance to thousands of new residents, housing units and jobs. The proposed Project's connection from the City's new housing and employment centers, and sports and entertainment venues, to the Metro Crenshaw Line and larger regional and State rail system will result in significant benefits for both the City and southern California region. As shown in **Table 4.2-10**, the housing and employment growth projected in the City, together with the proposed Project, are generating approximately 6.9 million annual boardings on the regional transportation system in 2026 and increase to approximately 13.9 million annual boardings in 2076;<sup>57</sup> the resulting reduction in VMT in 2026 is

---

56 Lea+Elliott, Inc. Inglewood Transit Connector EIR Operating Systems Conceptual Planning EIR Project Definition, December 2020. (Appendix 3.0-1)

57 City of Inglewood, Transit and Intercity Rail Program (TIRCP) Application for the City of Inglewood Transit Connector Project, January 16, 2020. Table 6.

approximately 30 million, and in 2076 will reach 67.4 million. These reductions will improve air quality through reduced emissions and generate a significant reduction in the generation of GHG emissions throughout the region.

The incremental changes in economic activity created by the indirect and induced employment associated with the proposed Project would be a small part of the overall future growth in economic activity in the City or the greater Los Angeles metropolitan region. The City is approving additional employment-generating land uses such as the LASED and HPSP, which would benefit from the proposed Project. Through their planning and entitlement actions, the future actions of the City and other surrounding local agencies would be subject to environmental review under CEQA and would be required to be consistent with regional and State plans and regulations. To the extent that future development that accommodates indirect and induced growth from the proposed Project is undertaken in a manner consistent with the multitude of planning and regulatory documents referred to throughout the technical sections of this EIR, many of the potential adverse environmental consequences would be reduced in magnitude or avoided altogether.

Although the economic effect of indirect and induced employment can be predicted because the adverse physical environmental impacts of these economic effects could occur at locations throughout the City and the Los Angeles metropolitan region, the environmental consequences of this type of economic growth are too speculative to evaluate or predict. Pursuant to CEQA Guidelines section 15145, no further analysis of the environmental consequences of indirect or induced growth associated with the proposed Project is required under CEQA.