4.3 BIOLOGICAL RESOURCES

4.3.1 INTRODUCTION

This section of the Recirculated Draft Environmental Impact Report (Recirculated Draft EIR) evaluates the impacts of the proposed Inglewood Transit Connector Project (proposed Project) on nesting or migratory birds/raptors and trees afforded protection pursuant to Federal, State of California (State), and local statues and regulations. The existing biological resource conditions in the area of the proposed Project are described, along with the methodology and the regulatory framework that guided the evaluation of biological resources. Potential impacts to biological resources that would result from the proposed Project are identified, along with any measures to mitigate significant effects of the proposed Project. The following information is incorporated into this section:

- *Preliminary Tree Survey of ATS Alignment*, Meridian Consultants LLC, June 11, 2018 (**Appendix H.1**);
- *Preliminary Tree Survey of Potential Support Facility Sites*, Meridian Consultants LLC, September 20, 2018 (**Appendix H.2**);
- *Preliminary and Supplemental Tree Inventory*, Pax Environmental, Incorporated, September 10, 2021 (**Appendix H.3**); and
- *CNDBR Survey,* Meridian Consultants LLC, September 10, 2021 (**Appendix H.4**)

The existing biological resources within the footprint of the proposed Project and immediate surrounding area have been evaluated based on existing published information and database research. The existing resources have been identified, along with the methodology and the regulatory framework that guided the evaluation thereof. Direct and/or indirect impacts to biological resources that would result from the demolition and clearing of existing vegetation, and construction and operation of the proposed Project were identified and evaluated as part of the Revised Initial Study prepared prior to the preparation of the December 2020 Draft EIR, and it was determined that the proposed Project would result in a "Less than Significant Impact." Additionally, for three of these thresholds, the Initial Study found that the proposed Project would have "No Impact."

The following impacts were determined to be less than significant:

- A substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS).
- A substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS.

- A substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

After circulation of the December 2020 Draft EIR for public review, the City revised the design of the proposed Project in response to consultation with key stakeholders in the community and comments received on the December 2020 Draft EIR. Specific changes to the proposed Project include raising the height of the ATS guideway along Market Street to preserve existing views of historic buildings, relocating the Prairie Avenue/Pincay Drive Station to the southwest corner of Prairie Avenue and Manchester Boulevard, redesign of the proposed MSF to allow this facility to be located on the proposed site with a new Vons store, and realignment of the guideway and stations on Prairie Avenue to the west side of Prairie Avenue. These changes include updated construction and operational details which resulted in similar impacts to biological resources compared to the December 2020 Draft EIR.

The changes to the design of the proposed Project do not create the potential for significant impacts related to the impacts above. The revised proposed Project would result in additional property acquisitions that would require demolition prior to construction of the proposed Project. Additionally, the revised proposed Project would include a Vons store replacement which would be developed prior to construction of the proposed Project. These changes would not affect the potential level of significance for the impacts discussed above.

Impacts found to be less than significant are further discussed in **Section 6.0: Other Environmental Considerations**.

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Recirculated Draft EIR.

4.3.2 METHODOLOGY

The methodology used to evaluate impacts to biological resources entails a review of the appropriate biological resources databases to determine which threatened or endangered plant or animal species have the potential to occur within the 7.5-minute quadrangles in which the proposed Project, including the guideway and stations, and support facility sites are located. The visual surveys were conducted to determine whether biological resources, including sensitive ecological areas, wetlands, wildlife migratory corridors, and/or habitat conservation areas, occur within 0.25 mile radius of the proposed guideway, stations, and other support facility sites to support these sensitive species. If the proposed Project could

potentially impact biological resources that exist within this area, there would be a potential for adverse impacts.

An intensive tree survey was completed to identify and categorize the existing street trees and landscaping that may be impacted (see **Appendix H.1**). This tree inventory covered the entire guideway alignment and locations of stations, including the public rights-of-way along the proposed Project with an approximately 50-foot buffer, as well as sites for potential support facilities. As the proposed Project has been refined, some of these potential locations have been eliminated from further consideration and were not analyzed in this section. Additionally, as the 50-foot buffer area included in the *Tree Inventory* provided a considerably conservative analysis for potential impacts of the proposed Project on biological resources, this section only addresses trees identified in the report that have been reasonably inferred to be within or near the footprint for the proposed guideway, stations, and support facilities.

The *Tree Inventory* collected information on all trees meeting the specifications for protected tree status as described by the City of Inglewood Tree Preservation Ordinance.[1] Data collection included a determination of species, geographic positioning system (GPS) coordinates, tree diameter at breast height (DBH) at 54.5 inches above the ground, and a description of tree health (poor, fair, or good as determined in the field). The information included in this tree inventory was reported in accordance with accepted scientific and technical standards that are consistent with the requirements of the USFWS and the CDFW. Based on the results of this inventory and the proposed improvements, loss of biological resources and their resulting impacts were identified. Construction of the guideway and stations would include equipment staging areas that may reach 22 feet from the guideway. As such, this analysis conservatively assumed that all existing trees within 25 feet of the proposed guideway and stations, and the MSF and PDS substation sites could be removed during construction. Additionally, potential measures to mitigate significant impacts have been identified for the proposed Project, as necessary.

4.3.3 REGULATORY FRAMEWORK

A review of the various federal, State, regional, and local government regulatory requirements was conducted to identify regulations that provide protections of biological resources. This section summarizes the various regulatory requirements that are relevant to the proposed Project.

1 Inglewood Municipal Code Chapter 12, Article 32, Tree Preservation.

4.3.3.1 Federal Regulations

Federal Endangered Species Act

The Federal Endangered Species Act[2] (FESA) of 1973, as amended, was promulgated to protect, and conserve any species of plant or animal that is endangered or threatened with extinction and the habitats in which these species are found.

Section 4(a) of the FESA[3] requires that critical habitat be designated by the USFWS "to the maximum extent prudent and determinable, at the time a species is determined to be endangered or threatened." Critical habitat is formally designated by USFWS to provide guidance for planners/managers and biologists with an indication of where suitable habitat may occur and where high priority of preservation for a particular species should be given. "Take" of endangered species is prohibited under Section 9[4] of the FESA. Take, as defined under FESA, means to "harass, harm, pursue, hunt, wound, kill, trap, capture, collect, or attempt to engage in any such conduct." Section 7 of the FESA requires federal agencies to consult with the USFWS on proposed federal actions that may affect any endangered, threatened or proposed (for listing) species or critical habitat that may support the species.

Section 10[5] of the FESA provides the regulatory mechanism that allows the incidental take of a listed species by private interests and nonfederal government agencies during lawful activities. Habitat conservation plans (HCPs) for the impacted species must be developed in support of incidental take permits for nonfederal projects to minimize impacts to the species and develop viable mitigation measures to offset the unavoidable impacts.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act[6] (MBTA) of 1918 is the domestic law that affirms or implements the United States' commitment to four international conventions with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, and prohibits the take, possession, import, export, transport, sale, purchase, barter, or offering of these activities, except under a valid permit or as permitted in the implementing regulations.

2 United Sate Code (USC), Title 16, Sections 1531-1544, Endangered Species Act.
3 USC Title 16, Section 1533. [ESA Section 4] Determination of endangered species and threatened species.
4 USC Title 16, Section 1538. [ESA Section 9] Prohibited acts.
5 USC Title 16, Section 1539. [ESA Section 10] Exceptions.
6 U.S. Fish and Wildlife Service (USFWS), Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712; Ch. 128; July 3, 1918; 40 Stat. 755) as amended by: Chapter 634; June 20, 1936; 49 Stat. 1556; P.L. 86-732; September 8, 1960; 74 Stat. 866; P.L. 90-578; October 17, 1968; 82 Stat. 1118; P.L. 91-135; December 5, 1969; 83 Stat. 282; P.L. 93-300; June 1, 1974; 88 Stat. 190; P.L. 95-616; November 8, 1978; 92 Stat. 3111; P.L. 99-645; November 10, 1986; 100 Stat. 3590 and P.L. 105-312; October 30, 1998; 112 Stat. 2956

As with the FESA, the MBTA also authorizes the Secretary of the Interior to issue permits for take. The procedures for securing such permits are found in Title 50 of the Code of Federal Regulations, together with a list of the migratory birds covered by the act. This law is generally protective of migratory birds but does not specify the type of protection required. USFWS administers permits to take migratory birds in accordance with the regulations promulgated by the MBTA. Nesting raptors, such as red-tailed hawks and burrowing owls, are protected under the MBTA. In common practice, USFWS places restrictions on disturbances allowed near active raptor nests.

4.3.3.2 State Regulations

California Endangered Species Act (CESA)

In addition to federal laws, the State implements the California Endangered Species Act,[7] (CESA) which is enforced by CDFW. The CESA program maintains a separate listing of species beyond the FESA, although the provisions of each act are similar.

State-listed threatened and endangered species are protected under provisions of the CESA. Activities that may result in "take" of individuals (defined in CESA as; "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") are regulated by CDFW. Habitat degradation or modification is not included in the definition of "take" under CESA. Nonetheless, CDFW has interpreted "take" to include the destruction of nesting, denning, or foraging habitat necessary to maintain a viable breeding population of protected species.

The State of California considers an endangered species as one whose prospects of survival and reproduction are in immediate jeopardy. A threatened species is considered as one present in such small numbers throughout its range that it is likely to become an endangered species in the near future in the absence of special protection or management. A rare species is one that is considered present in such small numbers throughout its range that it may become endangered if its present environment worsens. State threatened and endangered species are fully protected against take, as defined above.

The CDFW has also produced a species of special concern list to serve as a species watch list. Species on this list are either of limited distribution or their habitats have been reduced substantially, such that a threat to their populations may be imminent. Species of special concern may receive special attention during environmental review, but they do not have formal statutory protection. At the federal level, USFWS also uses the label species of concern, as an informal term that refers to species which might be in need of concentrated conservation actions. As the Species of Concern designated by USFWS do not

7 California, Fish and Game Code, Section 2050 et. seq. California Endangered Species Act.

receive formal legal protection, the use of the term does not necessarily ensure that the species will be proposed for listing as a threatened or endangered species.

California Native Plant Protection Act

The California Naïve Plant protection Act[8] (NPPA) was enacted in 1977 and allows the Fish and Game Commission to designate plants as rare or endangered. There are 64 species, subspecies, and varieties of plants that are protected as rare under the NPPA. The NPPA prohibits take of endangered or rare native plants, but includes some exceptions for agricultural and nursery operations; emergencies; and after properly notifying CDFW for vegetation removal from canals, roads, and other sites, changes in land use, and in certain other situations (see Fish and Game Code section 1900 et seq. for more information).

California Fish and Game Code

Section 3500-3516 – Birds

California Fish and Game Code Sections 3503, 3503.5, 3511, and 3513[9] are applicable to natural resource management. Section 3503 of the Code makes it unlawful to destroy any birds' nest or any birds' eggs that are protected under the MBTA. Further, any birds in the orders Falconiformes or Strigiformes (Birds of Prey, such as hawks, eagles, and owls) are protected under Section 3503.5 of the Fish and Game Code which makes it unlawful to take, possess, or destroy their nest or eggs.

A consultation with CDFW may be required prior to the removal of any bird of prey nest that may occur on a project site. Section 3511 of the Fish and Game Code lists fully protected bird species, where the CDFW is unable to authorize the issuance of permits or licenses to take these species. Pertinent species that are State fully protected by the State include golden eagle (*Aquila chrysaetos*) and white-tailed kite (*Elanus leucurus*).

Section 3513 of the Fish and Game Code makes it unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

8 California Department of Fish and Wildlife, Native Plant Protection Act (NPPA), accessed September 2021, https://www.wildlife.ca.gov/Conservation/Plants/Laws.

9 California Department of Fish and Wildlife, Fish and Game Code (FGC), Division 4. Birds and Mammals, [3000 - 4904](Division 4 enacted by Stats. 1957, Ch. 456), Part 2. Birds [3500 - 3864] (Part 2 enacted by Stats. 1957, Ch. 456)

California Fish and Game Code Sections 1900–1913 – Rare and Endangered Plants

California Fish and Game Code Sections 1900–1913[10] were developed to preserve, protect, and enhance Rare and Endangered plants in the State. The act requires all State agencies to use their authority to carry out programs to conserve Endangered and Rare native plants. Provisions of the Native Plant Protection Act prohibit the taking of listed plants from the wild and require notification of the CDFW at least ten days in advance of any change in land use which would adversely impact listed plants. This allows the CDFW to salvage listed plant species that would otherwise be destroyed.

California Native Plant Society Rare and Endangered Plant Species

The California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants is a widely-recognized resource that directly guides rare plant protection, conservation planning, and land acquisition and management in California. CNPS published the first edition of its Inventory of Rare and Endangered Plants in 1974, with the Inventory currently in its 8th edition.[11]

The CNPS Inventory of Rare and Endangered Plants ranks plants and threats as follows:

California Rare Plant Rank

- 1A – Plants Presumed Extirpated in California and either Rare or Extinct Elsewhere
- 1B – Plants Rare, Threatened, or Endangered in California and Elsewhere
- 2A – Plants Presumed Extirpated in California, But More Common Elsewhere
- 2B – Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere
- 3 – Plants about Which More Information is Needed - A Review List
- 4 – Plants of Limited Distribution - A Watch List

Threat Ranks

- .1 – Seriously threatened in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)
- .2 – Moderately threatened in California (20-80 percent occurrences threatened/moderate degree and immediacy of threat)
- .3 – Not very threatened in California (less than 20 percent of occurrences threatened/low degree and

10 California Fish and Game Code, Fish and Game Code (FGC), Division 2, Department of Fish and Wildlife, (700-1940), Chapter 10, Sections 1900-1913, Native Plant protection.

11 California Native Plant Society (CNPS), Inventory of Rare and Endangered Plants (V. 6) 2001, Note - the Inventory switched to being online (V. 7, developed and maintained by Larry Levine), and is currently in its 8th edition. https://www.cnps.org/rare-plants/cnps-inventory-of-rare-plants, accessed September 2021.

California Environmental Quality Act

Section 15380 of the CEQA Guidelines[12] independently defines "endangered" and "rare" species separately from the definitions of the CESA.[13] Under CEQA, "endangered" species of plants or animals are defined as those whose survival and reproduction in the wild are in immediate jeopardy, while "rare" species are defined as those who are in such low numbers that they could become endangered if their environment worsens.

Special-Status Species

Special-status species are those animal and plant species that, in the judgment of the resource agencies, trustee agencies, and certain nongovernmental organizations, warrant special consideration in the CEQA process. This includes the following:

- Officially designated "threatened," "endangered," or "candidate" species federally listed by the USFWS and protected under the Federal Endangered Species Act.
- Officially designated "rare," "threatened," "endangered," or "candidate" species listed by the CDFW and protected under the California Endangered Species Act. CDFW also maintains a list of "Fully Protected" species as well as "California Species of Special Concern" that are also generally treated as special-status species under CEQA.
- Species considered rare, threatened, or endangered under the conditions of Section 15380 of the CEQA Guidelines, such as plant species identified on lists 1A, 1B, and 2 in the CNPS Inventory of Rare and Endangered Vascular Plants of California, which may include species not found on either State or federal endangered species list.
- Other species considered sensitive, such as birds protected under the MBTA, which includes most native birds. A species may also be designated as special concern at the local level.

4.3.3.3 Local Plans and Regulations

General Plan

Conservation Element

The Conservation Element of the City's General Plan was adopted in October 1997 and addresses the conservation, development, and use of natural resource including water, soils, lakes, and mineral deposits.[14] The Conservation Element notes that resources which are typically addressed in conservation

12 California Code of Regulations, Title 14, Division 6, Chapter 3, Article 20, § 15380.
13 California, Fish and Game Code, Section 2050 et. seq. California Endangered Species Act.
14 City of Inglewood *General Plan*, "Conservation Element" (1997).

elements, including biological resources such as forests, wildlife, fisheries, shorelines, and agricultural land, are not found in Inglewood.

Land Use Element

The Land Use Element of the City's General Plan describes tree masses as an important component of the physical environment of the City.[15] The Land Use Element states that trees are not merely aesthetic elements of the urban setting, but also provide beneficial effects such as noise attenuation, amelioration of air pollution and dust, and temperature control. As such, landowners are encouraged to plant trees to realize these benefits. The following policy from the Land Use Element is applicable to the proposed Project:

Policy 3.2: Green Boulevards

Create Green Boulevards that protect cyclists, infiltrate stormwater and use vegetation to create a sense of place on Florence Avenue, La Brea Avenue, Manchester Boulevard and Prairie Avenue.

New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines

The New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines[16] (Downtown TOD Plan) provides guidelines and standards for design, including landscaping, within the Downtown Inglewood and Fairview Heights neighborhoods of the City and works to implement the City's vision for transforming the quality of the environment within these areas. The Downtown TOD Plan area consists of approximately 585 acres located in the center of Inglewood along the Metro K Line just east of the Florence Avenue/La Brea Avenue intersection. This Downtown planning and zoning area extends approximately one-half mile in all directions from the Metro K Line Downtown Inglewood station. The Fairview Heights TOD Plan area consists of approximately 328 acres located near the intersection of Florence Avenue and West Boulevard. This Fairview Heights planning and zoning area also extends approximately one-half mile in all directions from the Metro Station.

The Downtown TOD Plan includes concept plans, zoning, development standards and design guidelines, and an implementation action plan for consideration by applicants submitting any proposals for new construction or rehabilitation within the Plan area, as well as for consultation by City Staff when making recommendations for project approvals. The Downtown TOD Plan addresses architectural detail, signage, public art, and civic and cultural life. Further, the Downtown TOD Plan includes street tree concepts,

15 City of Inglewood *General Plan*, "Land Use Element" (adopted 1980, amended 1986, 2009, and 2016).

16 City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*.

including recommended street tree locations and species along roadways within the Downtown and Fairview Heights neighborhoods.

Section 2.8: Street Trees and Furniture[17] of the Downtown TOD Plan establishes that street trees are important elements of streetscapes and placemaking and provides guidelines on the character of trees placed within key areas of Downtown Inglewood. The Downtown TOD Plan recommends that Manchester Boulevard be lined with London Plane (*Platanus × acerifolia*) trees, or a similar species. This tree's ability to withstand air pollution, drought, as well as most diseases makes it a desirable street tree that would also provide some uniformity and connectivity for Downtown Inglewood. In the case of Florence Avenue, the Downtown TOD Plan calls for London Plane trees alternated with the California fan palm (*Washingtonia filifera*). Market Street should retain its existing street trees. The smaller arterial streets near Market Street may alternate between the Brisbane box (*Lophostemon confertus*), an evergreen tree, and the ginkgo (*Ginkgo biloba*), a deciduous tree. The Downtown TOD Plan states that these smaller street trees bring down the scale of the streets and create a sense of place throughout the streets of Downtown Inglewood.

Hollywood Park Specific Plan

The Hollywood Park Specific Plan (HPSP)[18] establishes development standards and design guidelines for the 238-acre Hollywood Park site at the northeast corner of the Prairie Avenue and Century Boulevard intersection and provides an overview of existing infrastructure and necessary improvements related to the Hollywood Park site, including measures for implementation measures of the HPSP. Portions of the area within the HPSP site have either been developed (SoFi Stadium) or are under development.

The HPSP provides guidelines and standards for improvements in the public right-of-way within the Specific Plan area, which includes approximately 0.5 miles of street frontage along Prairie Avenue. The HPSP includes streetscape standards and provides integrated and coordinated landscape design guidelines for new development along the perimeter of the HPSP area to integrate it with the adjoining urban fabric, achieve a diverse urban forest, and assist in developing districts of distinctive and appropriate character.[19] Sidewalk widths are intended to provide walking routes and parkway widths are designed to provide sufficient area for urban tree growth. The HPSP guidelines and standard for streetscape include identity elements that will differentiate Hollywood Park from nearby developments through architectural features, landscaping (such as seasonal displays of color), graphic elements (such as

17 City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, , Section 2.8: Street Trees and Furniture, p. 19.

18 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015.

19 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Section 3.2.2, Streetscape, p. 3-28.

signs or logos), special passenger or automobile paving, special night lighting effects, or other similar features.

The HPSP, Section 3.2.2: Streetscape, identifies selected street trees and the desired locations for their placement on internal roadways within the HPSP area as well as along major adjacent roadways, including Prairie Avenue, Century Boulevard, and the intersection corner of those roadways.[20] A majority of the tree species listed in the HPSP were selected from the City of Inglewood's approved tree list.[21] Selections were based upon recommendations from local arborists to create a palette of horticulturally successful, low maintenance, and climate-appropriate tree species. Alternative selections can be proposed, subject to City approval.

The HPSP states that street trees along Prairie Avenue shall be substantial and continuous to achieve an appropriate scale for the street.[22] Along the portion of Prairie Avenue north of Hardy Street, large columnar evergreen trees such as Afghan pine (*Pinus eldarica*) or Canary Island pine (*Pinus canariensis*) will provide continuity with the retail development to the east and the cemetery to the north. This arrangement is intended to visually reduce the scale of the street and provide ample shade as visitors approach the HPSP site. Both Prairie Avenue south of Hardy Street and the northern side of Century Boulevard will be similarly lined with large evergreen trees such as camphor trees (*Cinnamomum camphora*) or Southern magnolia (*Magnolia grandiflora*). In addition, large canopy flowering trees and palms will mark key points near the HPSP site, including the retail corner and major entries, and maintain adequate street visibility. Selected species include Date palm (*Phoenix dactylifera*), Chanticleer Callery pear (*Pyrus calleryana*), and pink trumpet tree (*Tabebuia impetignosa*). Palm trees at the northeastern corner of Prairie Avenue and Century Boulevard are intended to provide a thematic connection to Century Boulevard near the Los Angeles International Airport (LAX).

City of Inglewood Municipal Code

The City of Inglewood Municipal Code (IMC), Tree Preservation.[23] recognizes the importance of both native and nonnative trees within the City for the many benefits they provide. Properly maintained trees increase property values, maintain the natural ecology, temper the effects of extreme temperatures, reduce runoff, prevent erosion of topsoil, and help create and maintain the identity and visual character of the City.

20 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Section 3.2.2, Streetscape, Exhibit 3-25—Landscape Street Sections Map, p. 3-28.

21 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Section 3.2.2, Streetscape, Exhibit 3-25—Landscape Street Sections Map, p. 3-28.

22 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Section 3.2.2, Streetscape, p. 3-29.

23 Inglewood, California, Municipal Code, Article 32, Section 12-110 (2012), Tree Preservation.

Prior to removing or cutting a protected tree in the City, a permit must be obtained with the City's Parks, Recreation, and Library Services Department. Protected trees are specified by IMC include:[24]

(A) Trees having a minimum trunk diameter of eight inches measured fifty-four inches above the ground. When measuring a multitrunk tree, the diameters of the largest three trunks shall be added together.

(B) Street trees or other required trees such as those required as a condition of approval, Use Permit, or other zoning requirement, regardless of size.

(C) All memorial trees dedicated by an entity recognized by the City, and all specimen trees that define a neighborhood or community.

(D) Trees of the following species that have reached a minimum of four inches diameter trunk size:

- Big Leaf Maple (*Acer macrophyllum*)
- California Buckeye (*Aesculus californica*)
- Madrone Arbutus (*menziesii*)
- Western Dogwood (*Cornus nuttallii*)
- California Sycamore (*Platanus racemose*)
- Coast Live Oak (*Quercus agrifolia*)
- Canyon Live Oak (*Quercus chrysolepis*)
- Blue Oak (*Quercus douglassii*)
- Oregon White Oak (*Quercus garryana*)
- California Black Oak (*Quercus kelloggii*)
- Valley Oak (Quercus lobata)
- Interior Live Oak (Quercus wislizenii)
- California Bay (Umbellularia californica)

(E) A tree or trees of any size planted as a replacement for a protected tree.

Pursuant to the provisions of City Ordinance 12-06 5-8-12,[25] no person shall remove, destroy, perform cutting of branches over one inch in diameter, or disfigure or cause to be removed, destroyed, or disfigured any protected tree without having first obtained a permit to do so. Moreover, an application for a Protected tree Removal or Cutting Permit shall be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee Schedule.[26] All protected trees shall require a permit for removal, relocation, cutting or reshaping. All removed or disfigured trees shall also require replacement with like-size, like-kind trees or an equal value tree or trees as determined by the Parks, Recreation and Library Services Department.[27] If a replacement tree is unavailable in like size or kind, the value of the original protected tree shall be determined using the latest edition of *Guide for Plant*

24 Inglewood, California, Municipal Code, Section 12-113, Protected Trees.
25 Inglewood, California, Municipal Code, Chapter 12, Article 32, Section 12-117 (2012).
26 City of Inglewood, "Master Fee Schedule," September 2016.
27 Inglewood, California, Municipal Code, Chapter 12, Article 32, Section 12-117 (2012).

Appraisal by the International Society of Arboriculture.[28] The valuation is used to determine the number and size of replacement trees required. The replacement trees must be located on site wherever possible.[29] Where there is not sufficient room on site for the replacement trees in the judgment of the City's Parks, Recreation and Library Services Department, another site may be designated that is mutually agreeable.[30]

Inglewood and Lennox Greening Plan

The Social Justice Learning Institute and TreePeople joined forces in 2009 to improve the environmental and health conditions in the City of Inglewood and the adjacent unincorporated community of Lennox in developing the Inglewood and Lennox Greening Plan (Greening Plan).[31] The Greening Plan was completed via a grant provided by the State Strategic Growth Council Urban Greening and Sustainable Communities Planning Grant Program, under the authority of the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006 (Proposition 84).[32]

The Greening Plan is meant to serve as a master document to guide and coordinate greening efforts within Inglewood and Lennox. Priority actions include increasing tree canopy cover, building community gardens and implementing practices to capture and conserve rainwater on select sites identified in the Plan. Strategies have also been developed that will increase opportunities for active living and enhanced community health. In the Greening Plan, the term "greening" encompasses a comprehensive suite of objectives, activities, and strategies outlined throughout the plan.

4.3.4 EXISTING CONDITIONS

The proposed Project is located in the central and northern portions of the City of Inglewood, east of the San Diego Freeway (I-405) and north of the Glen Anderson Freeway (I-105) in Los Angeles County, California. The proposed Project would begin along Market Street near the Metro K Line and proceed south through downtown Inglewood, east on Manchester Boulevard, and south on Prairie Avenue until its intersection with Hardy Street.

As shown in **Section 3.0: Project Description**, **Figure 3.0-3: Project Vicinity Map**, the proposed Project would be located along the public rights-of-way within the City and upon several developed properties adjacent to the proposed Project which would accommodate the guideway, stations, and support facilities. The alignment of the guideway and locations of stations, and support facility sites (MSF and PDS

28 International Society of Arboriculture, *Guide for Plan Appraisal, 10th Edition*, 2018.
29 Inglewood, California, Municipal Code, Chapter 12, Article 23, Section 12-116 (2012).
30 Inglewood, California, Municipal Code, Chapter 12, Article 23, Section 12-116 (2012).
31 TreePeople, *Inglewood and Lennox Greening Plan*, December 2016.
32 California Code of Regulations, Division 43. The Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006.

substations) consist of developed or disturbed areas adjacent to active roadways. Disturbed land are areas that have been previously disturbed by grading, vehicle use, and/or vegetation clearing and maintenance while urban/developed land are areas that consist of buildings, roadways, and other built infrastructure.

4.3.4.1 Database Review

California Natural Diversity Database

The California Natural Diversity Database (CNDDB)[33] is an inventory of the status and locations of rare plants and animals in California maintained by CDFW. CNDDB staff collaborate with partners to maintain current lists of rare species, as well as to maintain an ever-growing database of GIS-mapped locations for these species.

As part of the environmental review for the Initial Study of the proposed Project completed in 2018, a review of the CNDDB found that the only plant species consist of ornamental landscaping and street trees as well as weeds and ruderal vegetation. A subsequent review of the CNDDB[34] was completed in September 2021 for the nine quadrangles (the Inglewood Quadrangle in which the prospect is located and the surrounding eight quadrangles including Beverly Hills, Hollywood, Los Angeles, Venice, South Gate, Redondo Beach, Torrance, and Long Beach) that encompass the proposed Project.[35] The review indicated that 193 species were identified for the nine quadrangles; this includes 29 species located within the Inglewood quadrant. Of these, five species were previously identified within approximately one mile of the proposed Project. These consisted of two wildlife species, crotch bumble bee (*Bombus crotchii*) and pocketed free-tailed bat (*Nyctinomops femorosaccus*), and three plant species, southern tarplant (*Centromadia parryi ssp. australis*), spreading navarretia (*Navarretia fossalis*), and prostrate vernal pool navarretia (*Navarretia prostrata*). Spreading navarretia and prostrate vernal pool navarretia are presumed extirpated from the area. The other species are presumed extant, but only occur in specific habitats that are not located within the footprint of the proposed Project.[36]

The CNDDB does not list any recently recorded observations of sensitive plant or animal species or sensitive habitats protected by State or federal law. However, it should be noted that a lack of records in CNDDB should not be construed to mean that no rare plants or animals occur in a given area.

33 California Department of Fish and Wildlife (CDFW), California Natural Diversity Database, accessed September 2021, https://www.wildlife.ca.gov/Data/CNDDB.

34 CDFW, California Natural Diversity Database, "Maps and Data," accessed September 2021, https://www.wildlife.ca.gov/Data/CNDDB.

35 See **Appendix H.4: CNDDB Survey** to this Recirculated Draft EIR.

36 CDFW, California Natural Diversity Database, "Maps and Data," accessed September 2021, https://www.wildlife.ca.gov/Data/CNDDB.

eBird Database

The eBird[37] is the world's largest biodiversity-related citizen science project, with more than 100 million bird sightings contributed each year by eBirders around the world. eBirders are a collaborative enterprise with hundreds of partner organizations, thousands of regional experts, and hundreds of thousands of users, and is managed by the Cornell Lab of Ornithology.

A review of the eBird database was completed in September 2021.[38] Common bird species noted in the eBird database historically observed within the area near the proposed Project include Brewer's Blackbird (*Euphagus cyanocephalus*), Black-bellied Plover (*Pluvialis squatarola*), Tricolored Blackbird (*Agelaius tricolor*), Canada Goose (*Branta canadensis*), Northern Rough-winged Swallow (*Stelgidopteryx serripennis*), American Coot (*Fulica americana*), Western Bluebird (*Sialia mexicana*), Lincoln's Sparrow (*Melospiza lincolnii*), Brown-headed Cowbird (*Molothrus ater*), Cliff Swallow (*Petrochelidon pyrrhonota*), Bushtit (*Psaltriparus minimus*), white-crowned sparrow (*Zonotrichia leucophrys*), house finch (*Carpodacus mexicanus*), and the common house sparrow (*Passer domesticus*).[39] None of these species are sensitive or protected by State or federal law with the exception of the Tricolored Blackbird (*Agelaius tricolor*) which is listed as a threated species under CESA.[40]

While the proposed Project does not include native habitat areas that are used for wildlife movement or migration corridors, various roadways and proposed support facility sites include and are lined with street trees and other landscaping that could harbor native birds or raptors and their nests.

4.3.4.2 Biological Setting

This section identifies areas within 0.25-mile radius of either side of the proposed Project guideway, stations, and support facility sites for the MSF and PDS substations that may be considered to have biological resources. The proposed Project is located within a highly developed and urbanized area and potential biological resources are limited to a few small parks. These parks are primarily landscaped areas and wildlife species utilizing the parks are mostly those adapted to living in an urban environment.

Sensitive animal and plant species and vegetation communities identified by the CNDDB as having the potential to occur within 0.25-mile radius of either side of the proposed Project's guideway, stations, and support facility sites are largely absent. Due to their mobility, some sensitive bird species may utilize

37 Cornell Lab of Ornithology, *eBird*, accessed September 2021, https://ebird.org/about.
38 Cornell Lab of Ornithology, *eBird*, "Hotspot Map," accessed September 2021, https://ebird.org/home.
39 Cornell Lab of Ornithology, *eBird*, "Hotspot Map," accessed September 2021, https://ebird.org/home.
40 California Endangered Species Act (CESA), Listing of Species Under the California Endangered Species Act, https://fgc.ca.gov/CESA#tcbb2015, accessed September 2021.

existing mature trees during migration but would not be supported as residents within this urbanized setting.

With the exception of the small pond located within the Inglewood Park Cemetery, there are no wetland areas within 0.25-mile radius of either side of the guideway, stations, support facility sites. Vegetation around this pond is nonnative, landscaped vegetation, but waterfowl were observed utilizing the small amount of open water there. No wildlife corridors exist within this area to support movement of wildlife species other than birds.

There are no Habitat Conservation Plans (HCPs) for this area. Further, there are no Significant Ecological Areas (SEAs) as designated by Los Angeles County Department of Regional Planning located within 0.25-mile radius of either side of the guideway, stations, support facility sites.[41]

Visual surveys were conducted in May 2018. The surveys consisted of visual observation and photographic documentation of all parks and open space areas along the guideway, stations, and support facility sites. During the surveys, mature trees existing in roadway medians directly within the footprint of the proposed Project were also observed.

4.3.4.3 Trees and Landscaping

The Tree Inventory was conducted by Pax Environmental on November 15, 16, 18, 19, and December 6, 2018, and an additional survey was conducted in August 2021 based on the changes to the alignment boundary. The Tree inventory covers the entire footprint of the proposed Project, including the public rights-of-way along the length of the guideway, locations of stations and the support facilities (MSF and PDS substation sites) with an approximately 50-foot buffer. This inventory involved an intensive effort to identify and categorize the existing street trees and landscaping within the proposed Project and identified trees determined to qualify as protected according to the provisions of the City's Tree Preservation Ordinance. The 50-foot buffer area included in the Tree Inventory (refer to **Appendix H.3**) provided a conservative analysis potential impacts to biological resources. See **Figure 4.3-1: Potential Tree Impacts – Market Street/Florence Avenue Station(a)** through **Figure 4.3-18: Potential Tree Impacts – Prairie Avenue(f)** (see end of this section) which shows the exiting tree locations along the guideway and within the acquisition sites. A breakdown of these trees by Project component is provided below.

Guideway

The proposed Automated Transit System (ATS) guideway would be approximately 1.6-miles long and would have a minimum clearance height of approximately 16 feet 6 inches above all roadways. The

41 Los Angeles County Department of Regional Planning, Significant Ecological Areas Program, GIS Web Application, accessed September 2021, http://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public.

elevated guideway will be primarily located within the public rights-of-way for the streets and sidewalk areas along Market Street, Manchester Boulevard, and Prairie Avenue with some encroachments on private property located adjacent to the public right of way for stations and vertical circulation features, such as stairways and escalators. All protected trees identified along the guideway consist of nonnative tree species which are commonly used in ornamental landscaping. Protected tree species within these areas predominantly consist of Mexican fan palm, little-leaved fig, narrow-leaved eucalyptus, Jacaranda, Canary Island pine, and Queen palm. See below for more detail.

Market Street

Figure 4.3-2 through **Figure 4.3-5** identify the existing trees along Market Street from Florence Avenue to Manchester Boulevard. **Table 4.3-1: Summary of Protected Trees Along Market Street** summarizes the types of trees located along and within the vicinity of the Market Street segment.

Table 4.3-1
Summary of Protected Trees Along Market Street

Common Name	Scientific Name	Quantity
Jacaranda	*Jacaranda mimosifolia*	10
Little-leaved Fig	*Ficus microcarpa*	13
Mexican fan palm	*Washingtonia robusta*	2
Narrow-leaved eucalyptus	*Magnolia grandiflora*	20
Total		45

*Source: Tree Inventory, Pax Environmental, Inc., September 10, 2021. Included as **Appendix H.3** of this Recirculated Draft EIR.*
[a] Unidentified tree species not included in the Tree Inventory but may qualify as protected.

As shown in **Table 4.3-1**, a total of 45 protected trees were identified for the Market Street segment. All 45 trees are located within the Downtown TOD Plan and qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.[42]

Manchester Boulevard

Figure 4.3-5 through **Figure 4.3-7**, and **Figure 4.3-9** through **Figure 4.3-12** identify the existing trees along Manchester Boulevard from Market Street to Prairie Avenue. **Table 4.3-2: Summary of Protected Trees Along Manchester Boulevard** summarizes the types of trees located along and within the vicinity of the Manchester Boulevard segment.

42 City of Inglewood, IMC Section 12-113, Protected Trees.

Table 4.3-2
Summary of Protected Trees Along Manchester Boulevard

Common Name	Scientific Name	Quantity
Callery pear	*Pyrus calleryana*	3
Carrotwood	*Cupaniopsis anacardioides*	2
Fern pine	*Podocarpus gracilior*	2
Italian stone pine	*Pinus pinea*	1
Jacaranda	*Jacaranda mimosifolia*	1
Leyland Cypress	*Cupressus leylandii*	20
Liquidambar	*Liquidambar styraciflua*	1
Little-leaved Fig	*Ficus microcarpa*	7
Mexican fan palm	*Washingtonia robusta*	101
Queen palm	*Syagrus romanzoffiana*	6
Tulip Tree	*Liriodendron tulipifera*	5
Water Gum	*Tristaniopsis laurina*	2
Western Sycamore	*Platanus racemosa*	1
Total		152

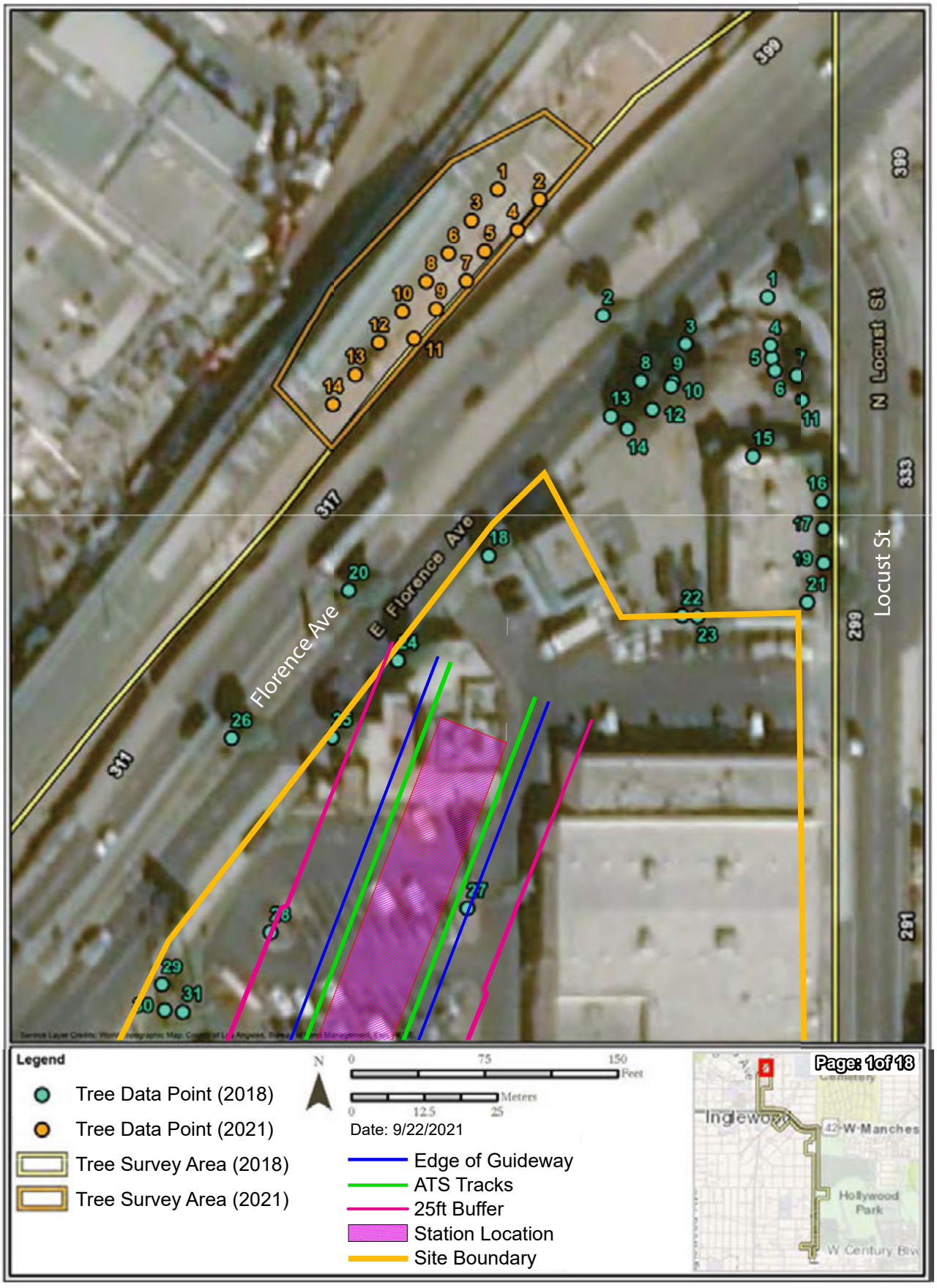
*Source: Tree Inventory, Pax Environmental, Inc., September 10, 2021. Included as **Appendix H.3** of this Recirculated Draft EIR.*
[a] Unidentified tree species not included in the Tree Inventory but may qualify as protected.

As shown in **Table 4.3-2**, a total of 152 protected trees were identified for the Manchester Boulevard segment. All 152 trees are located within the Downtown TOD Plan and qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.[43]

Prairie Avenue

Figure 4.3-12 through **Figure 4.3-18** identify the existing trees along Prairie Avenue from Manchester Boulevard to Hardy Street. **Table 4.3-3: Summary of Protected Trees Along Prairie Avenue** summarizes the types of trees located along and within the vicinity of the Prairie Avenue segment.

43 City of Inglewood, IMC Section 12-113, Protected Trees.

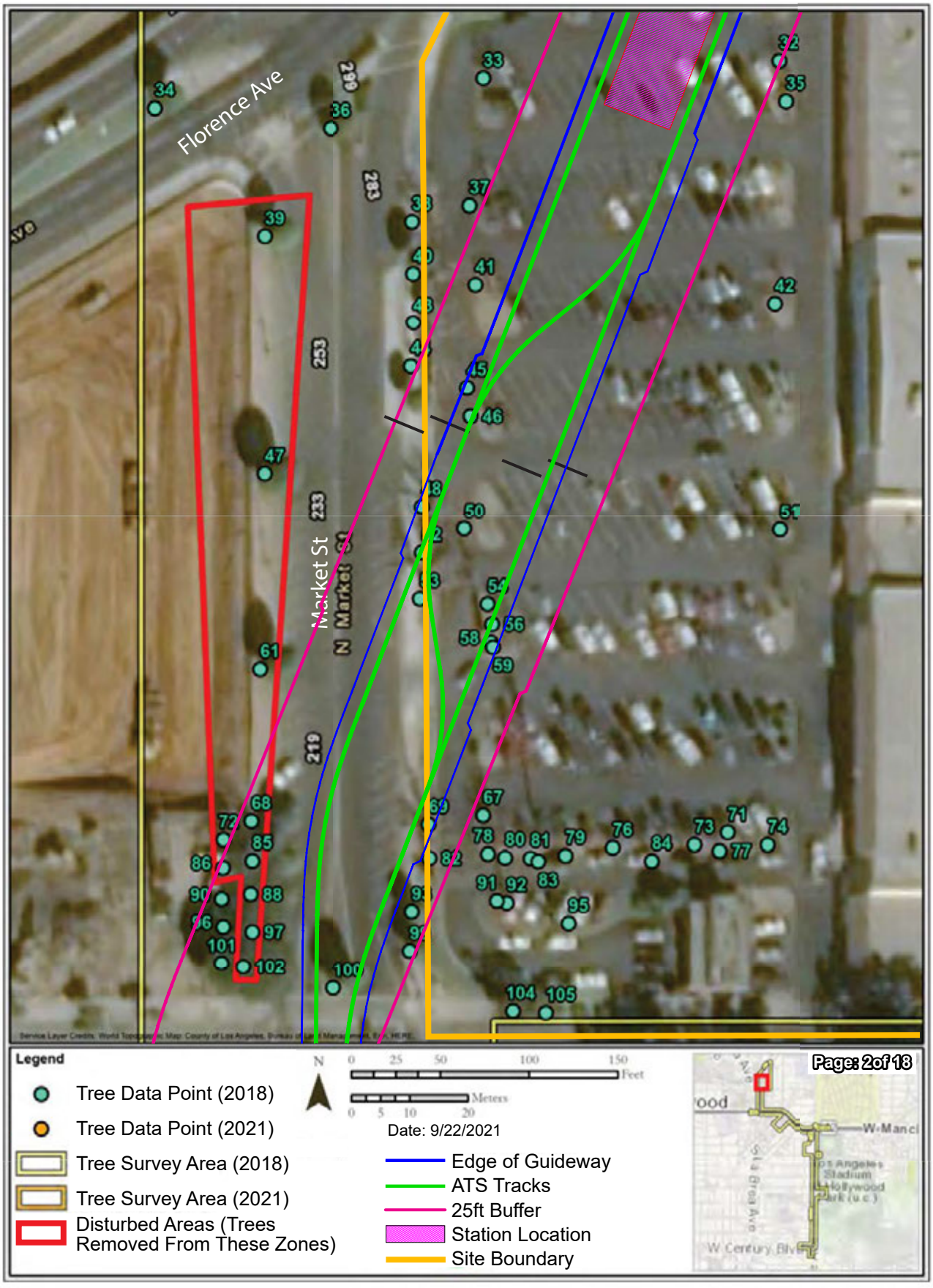


SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE **4.3-1**

Potential Tree Impacts – Market Street/Florence Avenue Station(a)

251-003-20

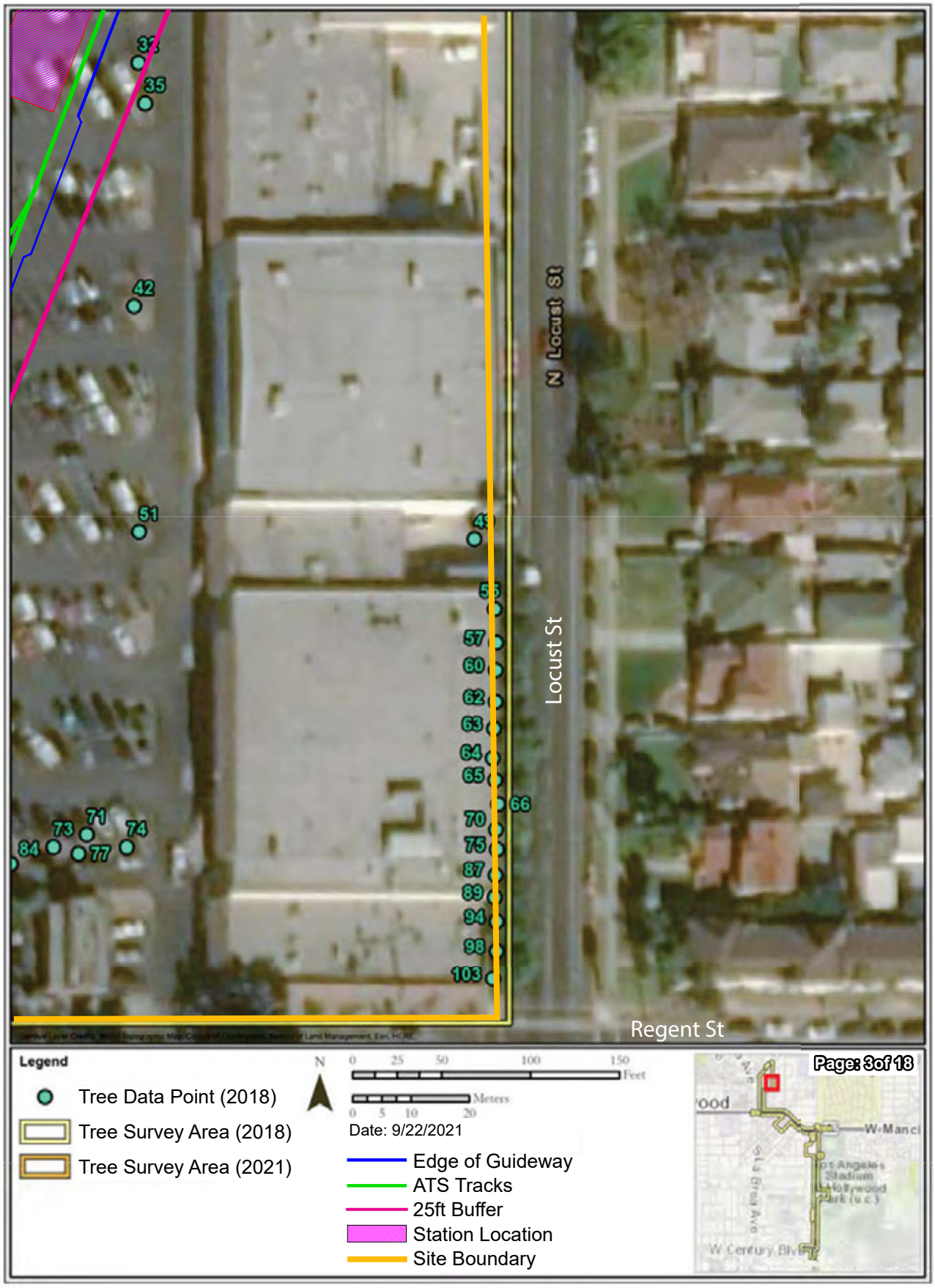


SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE **4.3-2**

Potential Tree Impacts – Market Street/Florence Avenue Station(b)

251-003-20



SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE **4.3-3**

Potential Tree Impacts – Market Street/Florence Avenue Station(c)

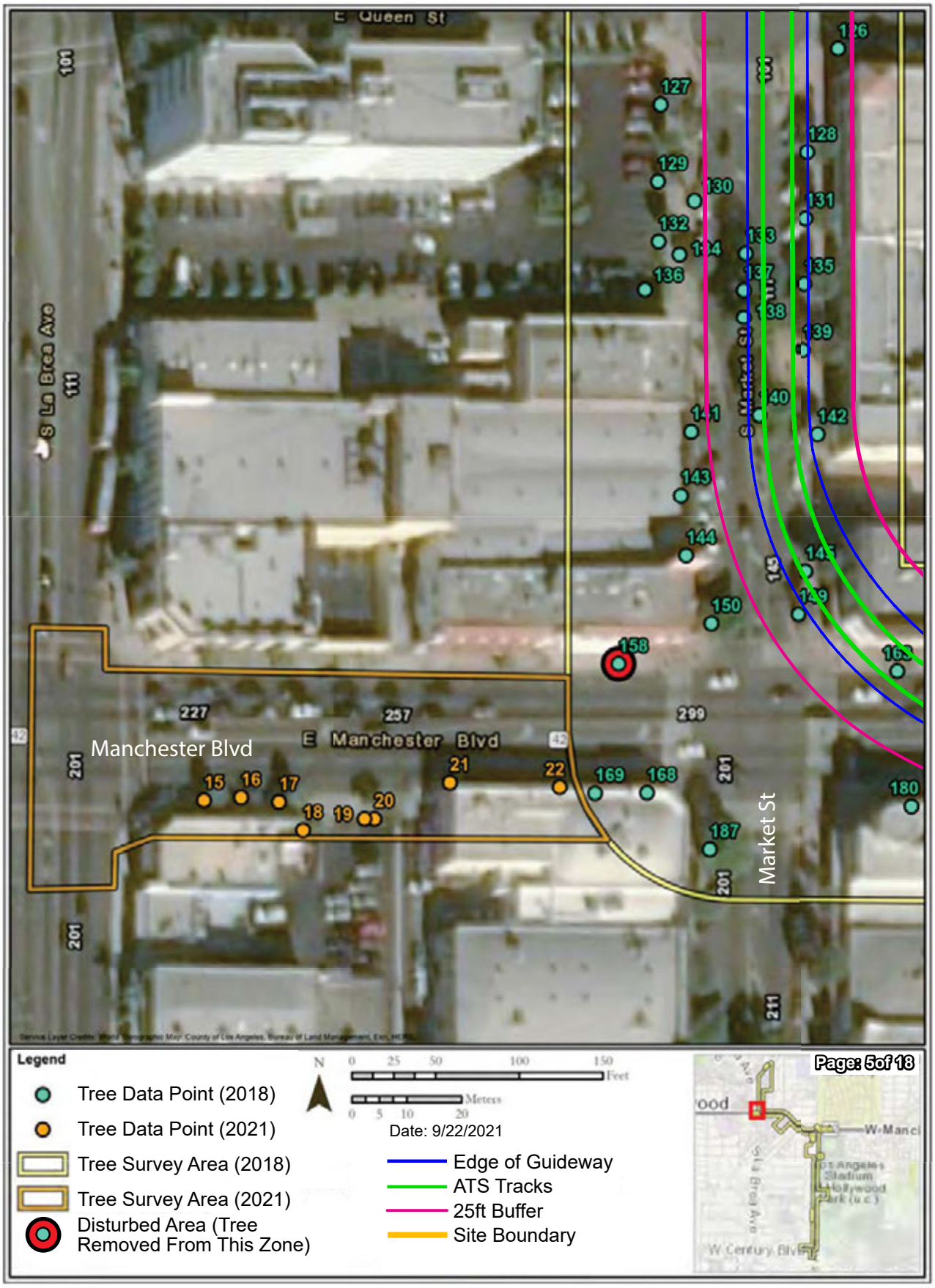
251-003-20

SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE **4.3-4**

Potential Tree Impacts – Market Street

251-003-20

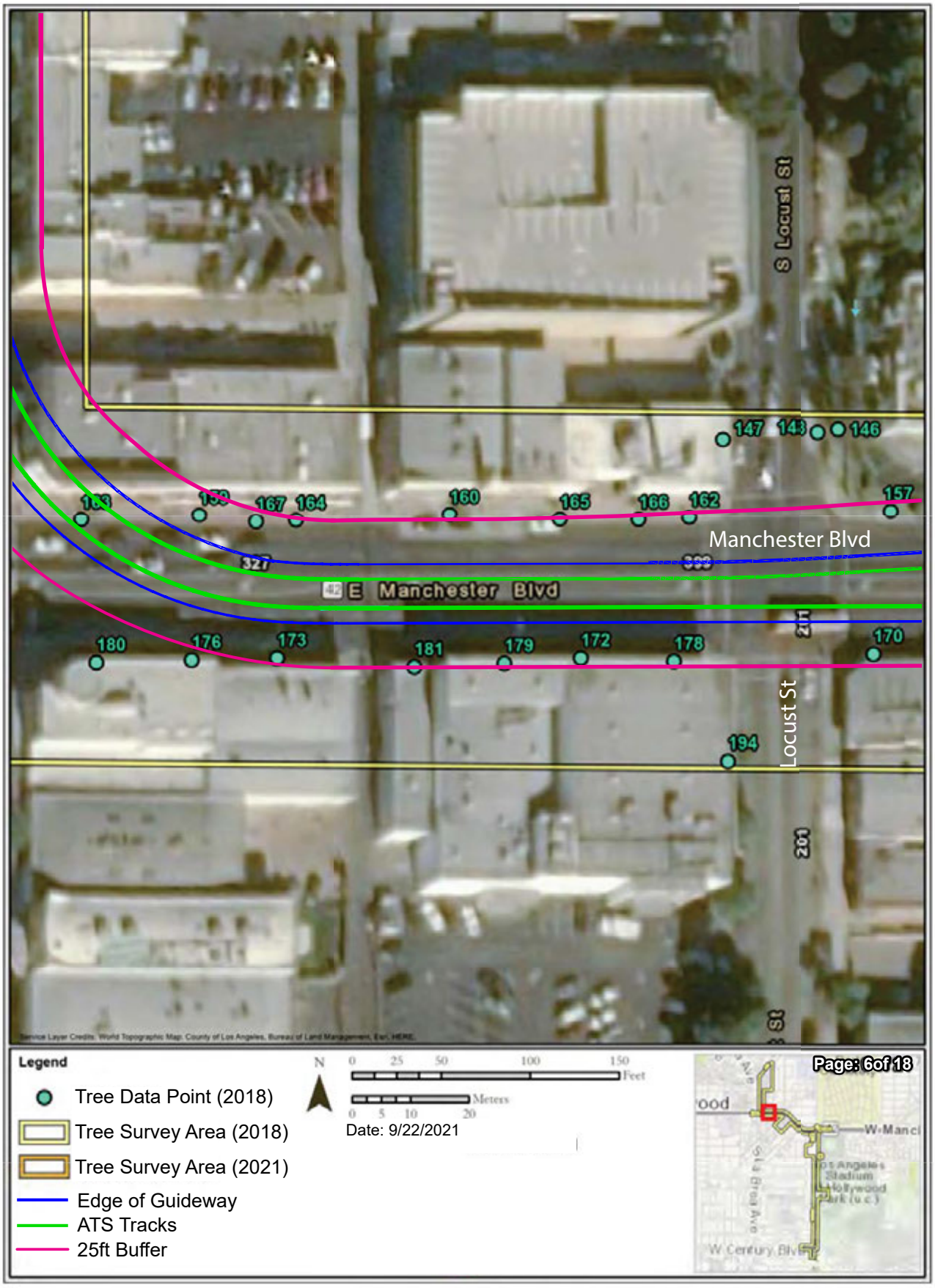


SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE **4.3-5**

Potential Tree Impacts – Market Street/Manchester Boulevard

251-003-20



SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE **4.3-6**

Potential Tree Impacts – Manchester Boulevard(a)

251-003-20

SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE **4.3-7**

Potential Tree Impacts – Manchester Boulevard/MSF Site(a)

251-003-20

SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE **4.3-8**

Potential Tree Impacts – MSF Site

251-003-20

SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE **4.3-9**

Potential Tree Impacts – Manchester Boulevard/MSF Site(b)

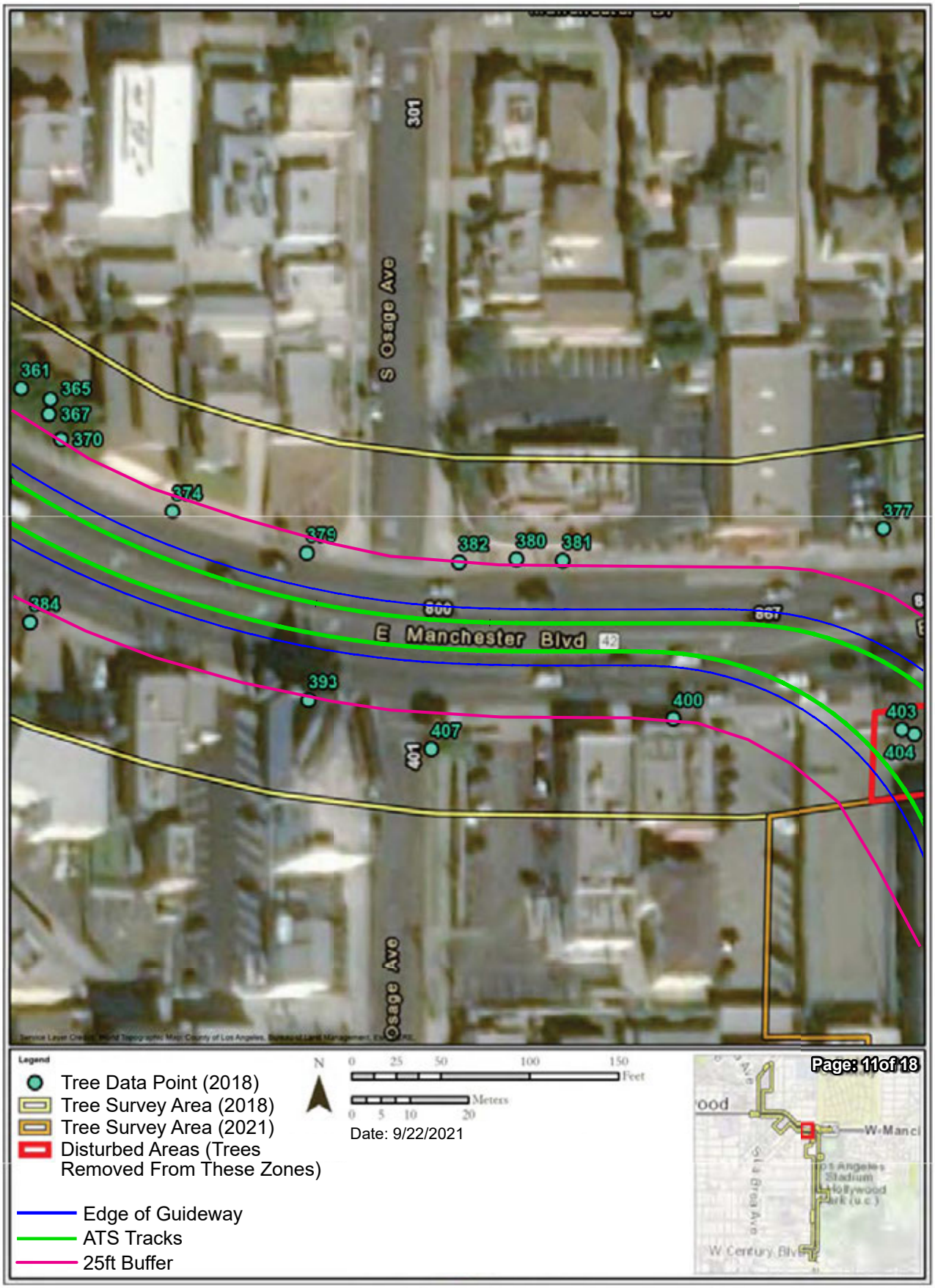
251-003-20

SOURCE: Pax Environmental, Inc. – September 2018; Meridian Consultants - 2021

FIGURE **4.3-10**

Potential Tree Impacts – Manchester Boulevard(b)

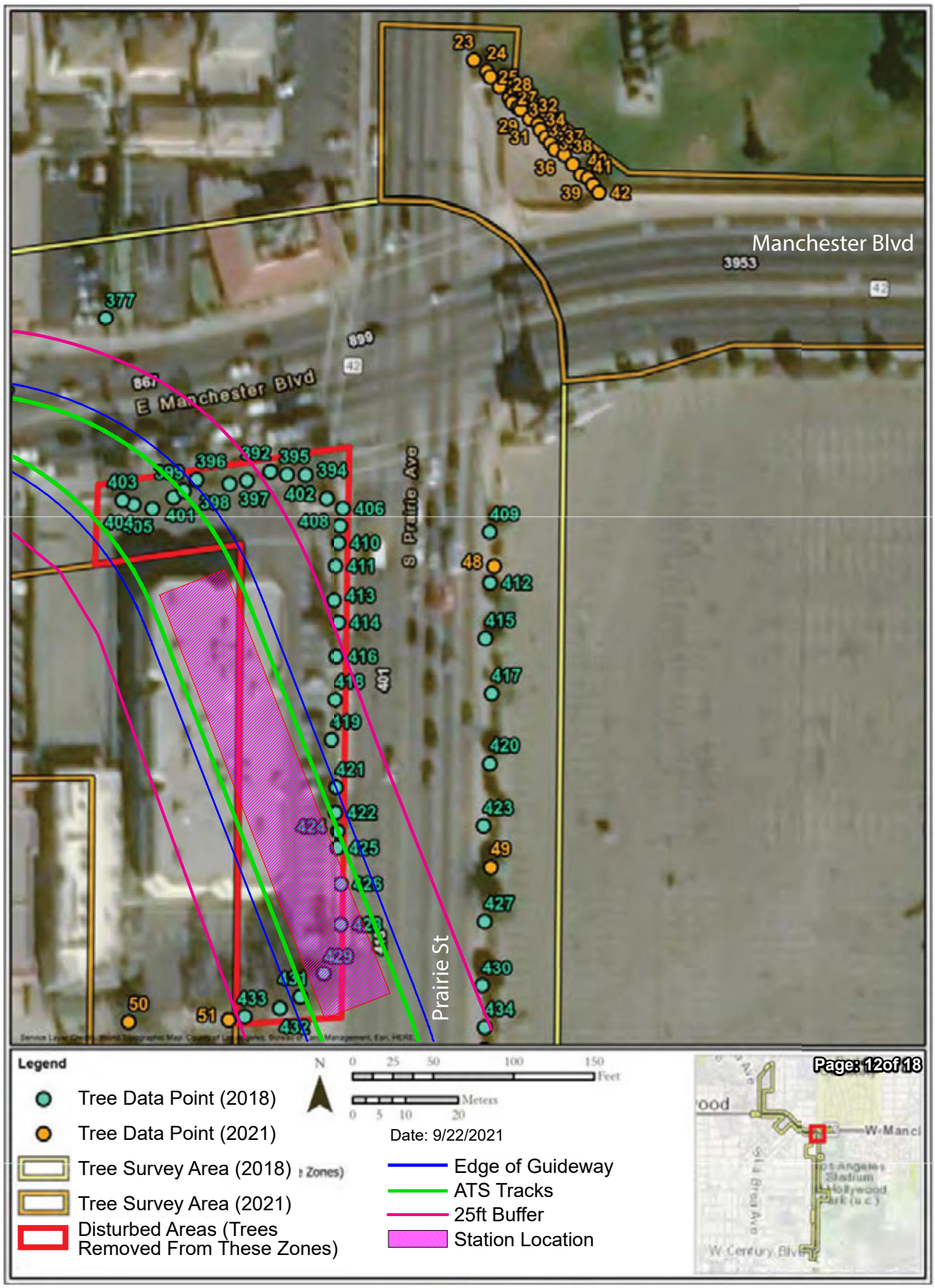
251-003-20



SOURCE: Pax Environmental, Inc. – September 2021 Meridian Consultants - 2021

FIGURE **4.3-11**

Potential Tree Impacts – Manchester Boulevard(c)

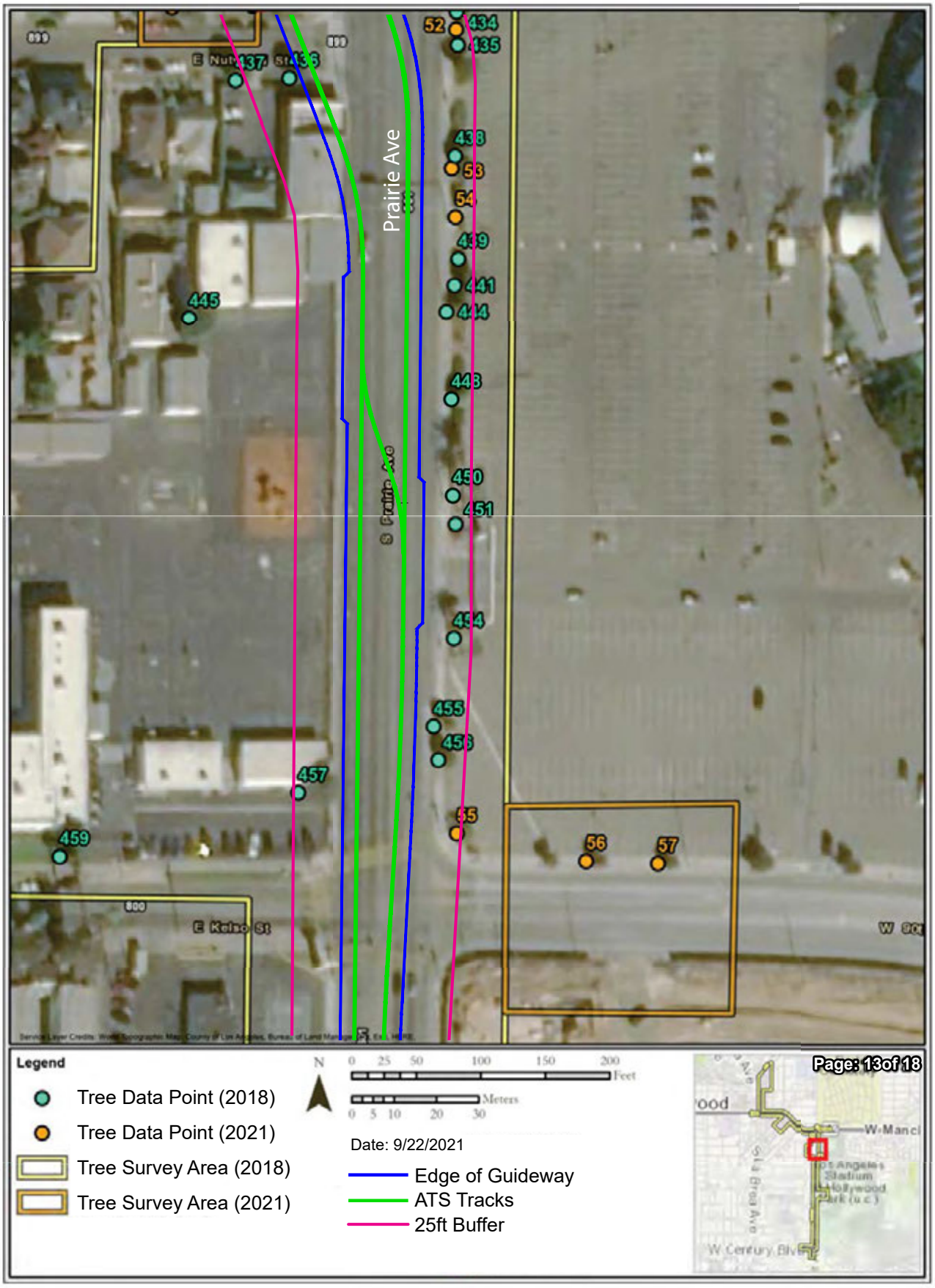


SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE **4.3-12**

Potential Tree Impacts – Manchester Boulevard/Prairie Avenue

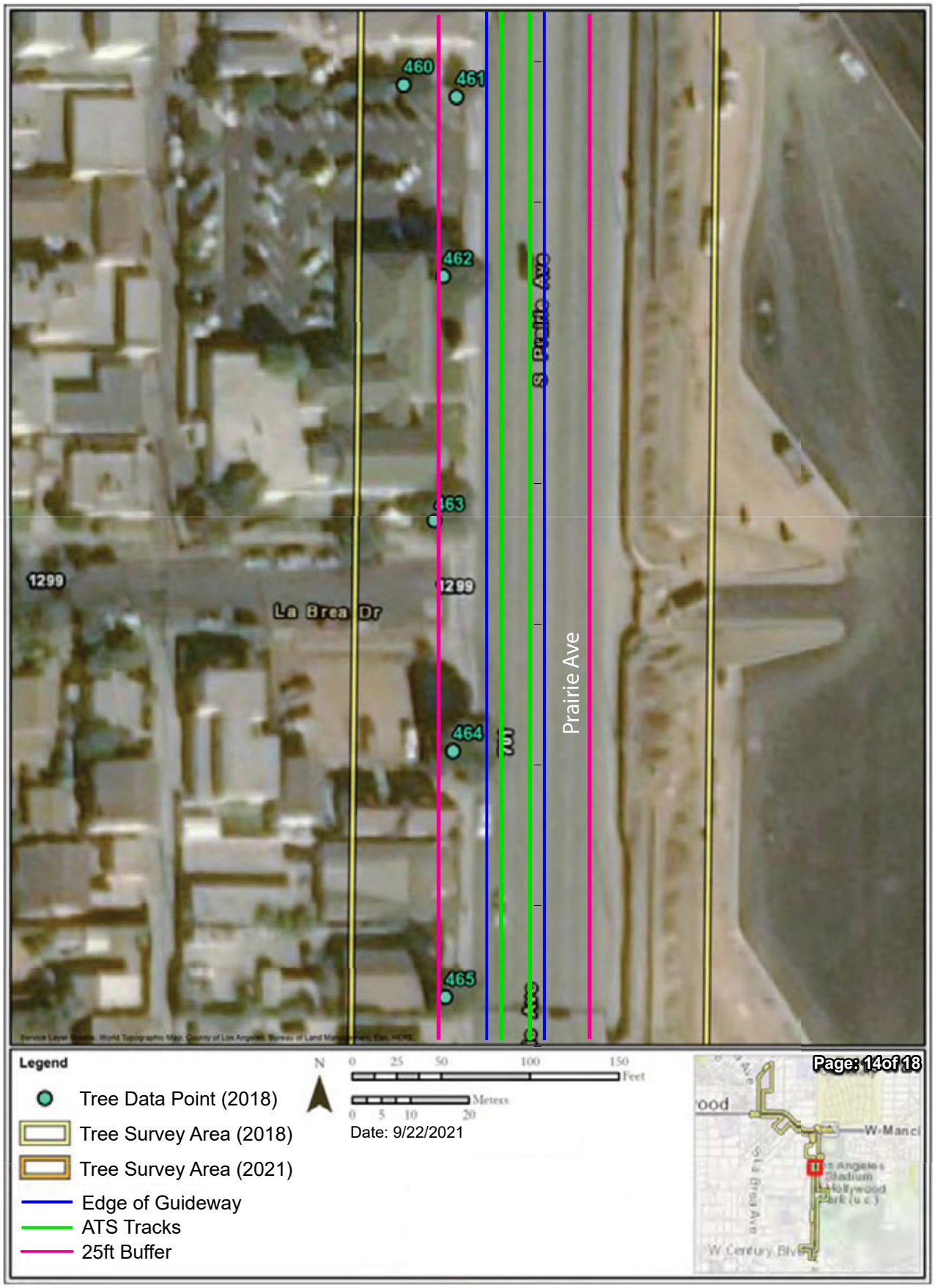
251-003-20



SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE **4.3-13**

Potential Tree Impacts – Prairie Avenue(a)

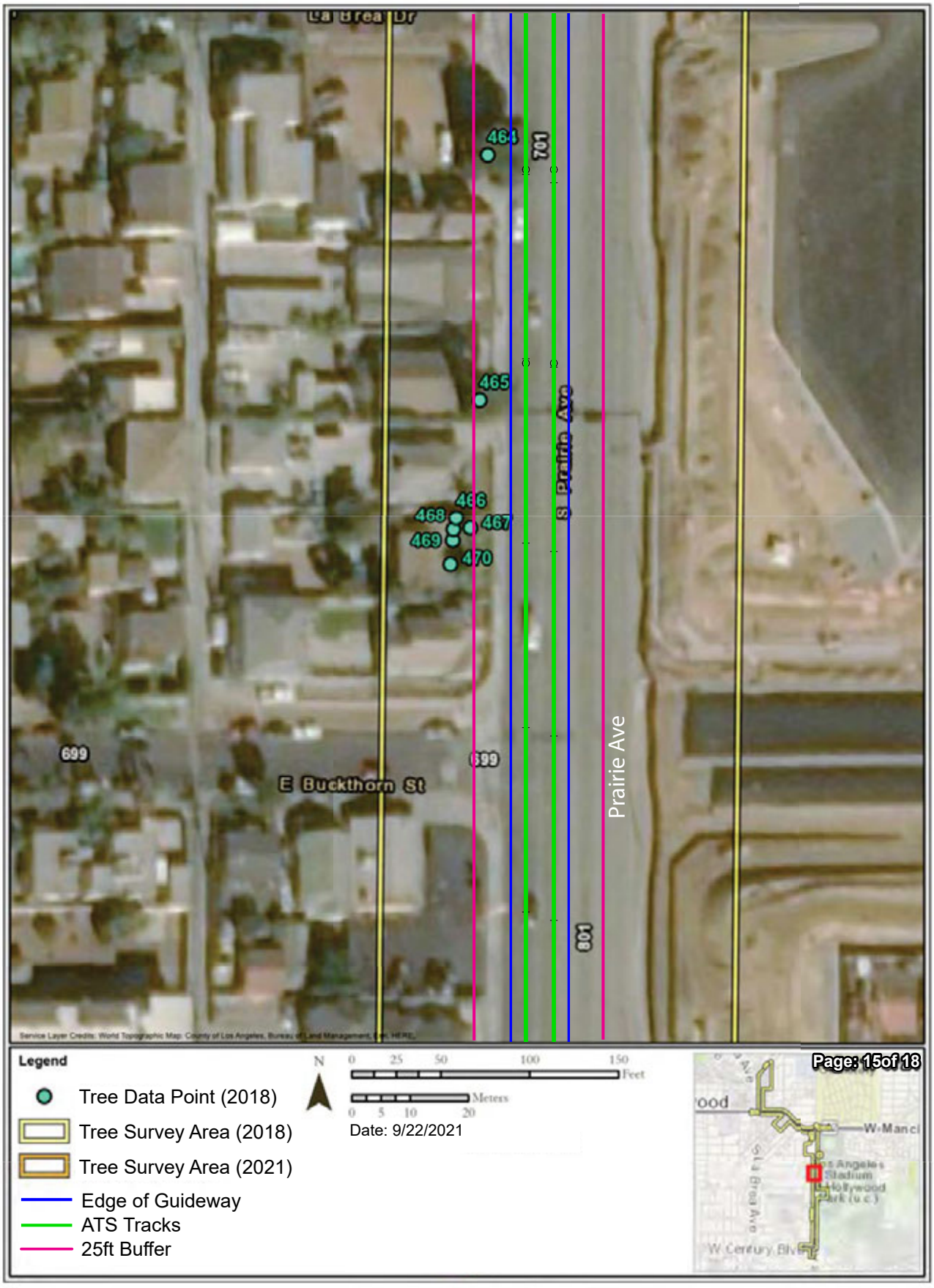


SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE **4.3-14**

Potential Tree Impacts – Prairie Avenue(b)

251-003-20



SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE **4.3-15**

Potential Tree Impacts – Prairie Avenue(c)

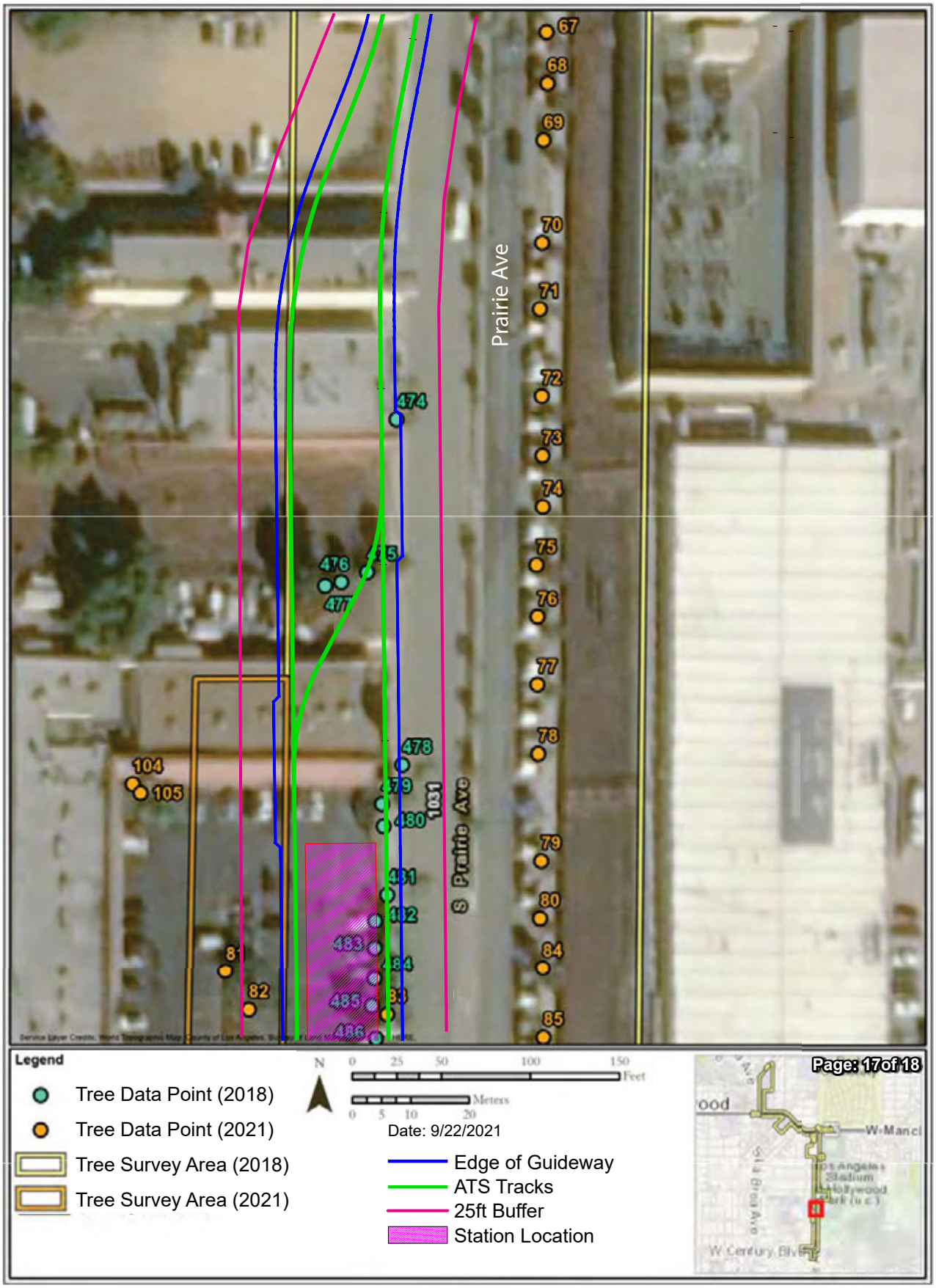
251-003-20

SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE **4.3-16**

Potential Tree Impacts – Prairie Avenue(d)

251-003-20

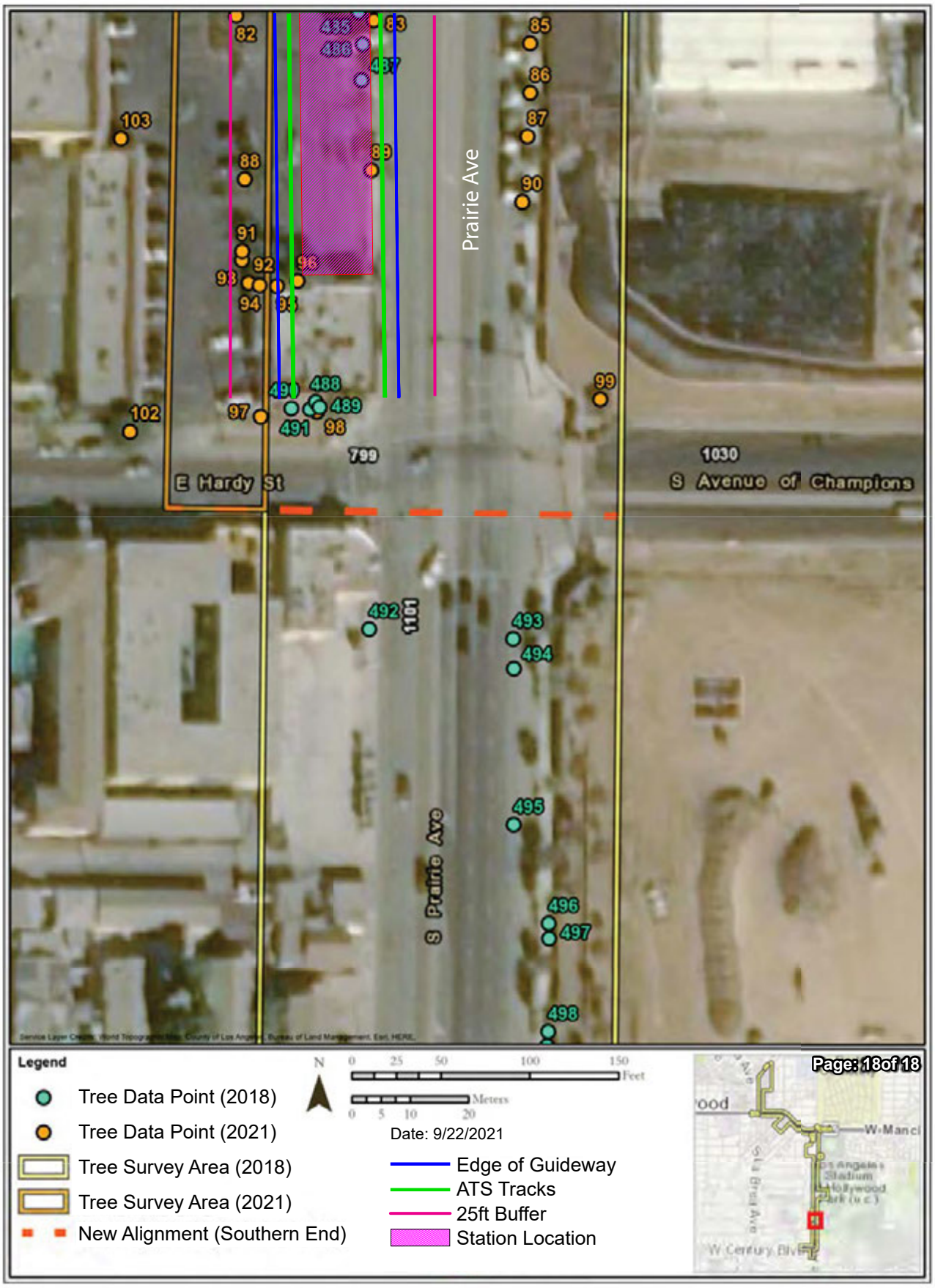


SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE **4.3-17**

Potential Tree Impacts – Prairie Avenue(e)

251-003-20



SOURCE: Pax Environmental, Inc. – September 2021; Meridian Consultants - 2021

FIGURE **4.3-18**

Potential Tree Impacts – Prairie Avenue(f)

251-003-20

Table 4.3-3
Summary of Protected Trees Along Prairie Avenue

Common Name	Scientific Name	Quantity
Callery Pear	*Pyrus calleryana*	2
Carrotwood	*Cupaniopsis anacardioides*	4
Chinese elm	*Ulmus parvifolia*	3
Crape-Myrtle	*Lagerstro emia speciosa*	2
Evergreen ash	*Fraxinus uhdei*	1
Fern pine	*Podocarpus gracilior*	2
Giant yucca	*Yucca gigantea*	2
Liquidambar	*Liquidambar styraciflua*	1
Little-leaved Fig	*Ficus microcarpa*	12
Magnolia	*Magnolia grandiflora*	2
Mexican Ash	*Fraxinus berlandieriana*	18
Mexican fan palm	*Washingtonia robusta*	10
Naked Coral Tree	*Erythemacorallodendron*	1
Queen palm	*Syagrus romanzoffiana*	13
Red Gum	*Eucalyptus camaldulensis*	1
Total		74

Source: Tree Inventory, Pax Environmental, Inc., September 10, 2021. Included as ***Appendix H.3*** *of this Recirculated Draft EIR.*

As shown in **Table 4.3-3**, a total of 74 protected trees were identified along Prairie Avenue. These trees are not located within a City plan but remain within the jurisdiction of the IMC and qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.[44]

The guideway and stations would be developed within areas included in the Downtown TOD Plan and adjacent to the western portion of the HPSP area. The remainder of the guideway would be subject to the requirements of the IMC. While the Downtown TOD Plan and HPSP contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, they do contain unique provisions and recommendations for the location of tree placement and types of tree species to be used.

44 City of Inglewood, IMC Section 12-113, Protected Trees.

Stations and MSF

The proposed Project would require a number of full and/or partial property and air rights acquisitions and easements or leases for construction and continued operation of the guideway, stations, MSF, and other support facilities.

Market Street/Florence Avenue Station

The Market Street/Florence Avenue station site is located along a portion of Market Street and Florence Avenue generally located between Market Street and Locust Street.

Figure 4.3-1 through **Figure 4.3-3** identify the existing trees associated the Market Street/Florence Avenue station site. **Table 4.3-4: Summary of Protected Trees Within the Market Street/Florence Avenue Station Site** summarizes the types of trees associated with the Market Street/Florence Avenue station site.

Table 4.3-4
Summary of Protected Trees Within Market Street/Florence Avenue Station Site

Common Name	Scientific Name	Quantity
Brazilian pepper	*Schinus terebinthifolius*	23
California fan palm	*Washingtonia filifera*	2
Callery pear	*pyrus taiwanensis*	2
Canary Island pine	*Pinus canariensis*	2
Coral tree	*Erythrina caffra*	10
Date Palm	*Phoenix dactylifera*	14
European hackberry	*Celtis australis*	1
Little-leaved Fig	*Ficus microcarpa*	17
Mexican fan palm	*Washingtonia robusta*	7
Total		78

*Source: Tree Inventory, Pax Environmental, Inc., September 10, 2021. Included as **Appendix H.3** of this Recirculated Draft EIR.*

As shown in **Table 4.3-4,** a total of 78 protected trees are associated with the Market Street/Florence Avenue station site. Of these, 58 are located within the site and are considered private property. The remaining 20 trees are public street trees located throughout the perimeter of the site along Florence Avenue, Locust Street, and Regent Street. All protected trees identified within this area and adjoining parcels consist of nonnative, ornamental tree species which are commonly used in ornamental landscaping. Protected tree species within this site predominantly consist of Little-leaved Fig, Brazilian

pepper, and Coral tree. As no protected tree *species* were identified, the 78 trees identified as protected qualified as such by meeting the minimum trunk diameter size requirements of the IMC Section 12-113.[45] This site would be developed within an area included in the Downtown TOD Plan. While the Downtown TOD Plan does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it does contain unique provisions and recommendations for the location of tree placement and types of tree species to be used.

Prairie Avenue/Manchester Boulevard Station

The Prairie Avenue/Manchester Boulevard station site is proposed on the southwest corner of the Prairie Avenue and Manchester Boulevard intersection.

Figure 4.3-12 identifies the existing trees associated the Prairie Avenue/Manchester Boulevard station site. However, as indicated in **Figure 4.3-12**, the trees identified within the Prairie Avenue/Manchester Boulevard station site have been removed since the 2018 *Tree Inventory* was conducted. The supplemental 2021 *Tree Inventory* identified two additional trees located adjacent to the site along Nutwood Street. These trees are identified at Mexican Ash (*Ulmus parvifolia*) and qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.[46]

Prairie Avenue/Hardy Street Station

The Prairie Avenue/Hardy Street station site is located west of Prairie Avenue on the northwest corner of the Prairie Avenue and Hardy Street intersection.

Figure 4.3-17 and **Figure 4.3-18** identify the existing trees associated with the Prairie Avenue/Hardy Street station site. **Table 4.3-5: Summary of Protected Trees Within the Prairie Avenue/Hardy Street Station Site** summarizes the types of trees associated with the Prairie Avenue/Hardy Street station site. As shown in **Table 4.3-7**, a total of 32 protected trees are associated with the Prairie Avenue/Hardy Street station site. All 32 trees located within the site are considered private property. All protected trees identified within this area and adjoining parcels consist of nonnative, ornamental tree species which are commonly used in ornamental landscaping.[47] These trees are not located within a City plan but remain within the jurisdiction of the IMC and qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.[48]

45 City of Inglewood, IMC Section 12-113, Protected Trees.
46 City of Inglewood, IMC Section 12-113, Protected Trees.
47 City of Inglewood, IMC Section 12-113, Protected Trees.
48 City of Inglewood, IMC Section 12-113, Protected Trees.

Table 4.3-5
Summary of Protected Trees Within Prairie Avenue/Hardy Street Station Site

Common Name	Scientific Name	Quantity
Bird of Paradise	*Strelitzia reginae*	1
Carrotwood	*Cupaniopsis anacardioides*	1
Chinese Elm	*Ulmus parvifolia*	1
Mexican Ash	*Washingtonia robusta*	12
Mexican Fan Palm	*Syagrus romanzoffiana*	2
Queen palm	*Syagrus romanzoffiana*	15
Total		32

Source: Tree Inventory, Pax Environmental, Inc., September 10, 2021. Included as ***Appendix H.3*** *of this Recirculated Draft EIR.*

Maintenance and Storage Facility (MSF)

The MSF is proposed on a site developed with an existing retail commercial building. The MSF building is proposed on the southern half of this site and the new replacement Vons store on the eastern half of the site.

Figure 4.3-7 through **Figure 4.3-9** identify the existing trees associated the MSF/Vons site. **Table 4.3-6: Summary of Protected Trees Within the MSF/Vons Site** summarizes the types of trees associated with the MSF site. As shown in **Table 4.3-6**, a total of 119 protected trees are associated with the MSF/Vons site. Of these, 116 are located within the site and are considered private property. The remaining 3 trees are public street trees located along Nutwood Street. All protected trees identified within the MSF/Vons site consist of nonnative, ornamental tree species which are commonly used in ornamental landscaping. Protected tree species within this site predominantly consist of Mexican fan palm, River red gum, and Chinese elm. As no protected tree *species* were identified, the 119 trees identified as protected qualified as such by meeting the minimum trunk diameter size of 1.5 inches pursuant of the IMC Section 12-113.[49] The entirety of the MSF and new replacement Vons store would be developed within an area included in the Downtown TOD Plan. While the Downtown TOD Plan does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it does contain unique provisions and recommendations for the location of tree placement and types of tree species to be used.

49 City of Inglewood, IMC Section 12-113, Protected Trees.

Table 4.3-6
Summary of Protected Trees Within the MSF/Vons Site

Common Name	Scientific Name	Quantity
Chinese elm	*Ulmus parvifolia*	10
Liquidambar	*Liquidambar styraciflua*	8
Little-leaved Fig	*Ficus microcarpa*	3
Mexican fan palm	*Washingtonia robusta*	66
River Red Gum	*Eucalyptus camaldulensis*	32
Total		119

*Source: Tree Inventory, Pax Environmental, Inc., December 10, 2018. Included as **Appendix H.3** of this Recirculated Draft EIR.*

Power Distribution System Substations

The proposed Project would include two power distribution system (PDS) substations. These PDS substations will provide the necessary power for the proposed Project including traction power, auxiliary power, and housekeeping power for the stations and related infrastructure. One of the PDS substations will be located on the MSF site and the second PDS substation will be located on the Prairie Avenue/Hardy Street station site. As discussed above, the MSF site which includes the first PDS substation would be developed within an area included in the Downtown TOD Plan and would be subject to the tree requirements for this plan. The second PDS substation would be located within the Prairie Avenue/Hardy Street station site which is not located within a City plan but is subject to the provisions of the IMC.

4.3.4.4 Wildlife

Birds

Common bird species historically observed near the proposed Project as noted in the CNDDB[50] and eBird[51] database include Brewer's Blackbird (Euphagus cyanocephalus), Black-bellied Plover (Pluvialis squatarola), Tricolored Blackbird (Agelaius tricolor), Canada Goose (Branta canadensis), Northern Rough-winged Swallow (Stelgidopteryx serripennis), American Coot (Fulica americana), Western Bluebird (Sialia mexicana), Lincoln's Sparrow (Melospiza lincolnii), Brown-headed Cowbird (Molothrus ater), Cliff Swallow (Petrochelidon pyrrhonota), Bushtit (Psaltriparus minimus), white-crowned sparrow (Zonotrichia leucophrys), house finch (Carpodacus mexicanus), and the common house sparrow (Passer domesticus).[52] None of these species are sensitive or protected by State or federal law with the exception

50 CDFW, California Natural Diversity Database, "Maps and Data," accessed September 2021, https://www.wildlife.ca.gov/Data/CNDDB.
51 Cornell Lab of Ornithology, *eBird*, "Hotspot Map," accessed September 2021, https://ebird.org/home.
52 Cornell Lab of Ornithology, *eBird*, "Hotspot Map," accessed September 2021, https://ebird.org/home.

of the Tricolored Blackbird (*Agelaius tricolor*), which is listed as a threated species under CESA.[53] The Tricolored Blackbird (*Agelaius tricolor*) primarily nests in grasslands and freshwater wetlands and is not likely to nest in street trees.[54]

Given the nature that birds will nest in a variety of trees and other locations, the possibility exists that these species listed above, as well as others, may be present and nest in existing trees within the footprint of the proposed Project.

Other Wildlife Species

Wildlife species identified during the most recent review of the CNDDB crotch bumble bee (*Bombus crotchii*) and pocketed free-tailed bat (*Nyctinomops femorosaccus*). However, observation of neither species has been recently recorded on site; observation of the pocketed free-tailed bat was last recorded in 1994 and the crotch bumble bee in 1953.[55]

Additionally, the CDFW describes the habitat used by the pocketed free-tailed bat as including rock crevices in cliffs in pinyon-juniper woodlands, desert scrub, desert succulent shrub, desert riparian, desert wash, alkali desert scrub, Joshua tree, and palm oasis.[56] Habitat used by the crotch bumble bee consists of shrubland and grassland.[57] None of these habitats occur within or are adjacent to the proposed Project.

Wildlife in the area predominantly consists of domesticated animals and pets, though wild animals that are capable of living in close proximity to man, such as birds, skunks, and squirrels, are found in the area.

4.3.5 ADJUSTED BASELINE

As discussed previously, the street trees along Prairie Avenue have since been removed for the development of the HPSP. The HPSP area would be fully developed per the design guidelines of the HPSP, prior to the construction of the proposed Project.[58] The HPSP calls for large columnar evergreen trees such as Afghan pine (*Pinus eldarica*) or Canary Island pine (*Pinus canariensis*) along Prairie Avenue north of Hardy Street. This arrangement will visually reduce the scale of the street and will provide ample shade

53 California Endangered Species Act (CESA), Listing of Species Under the California Endangered Species Act, https://fgc.ca.gov/CESA#tcbb2015, accessed September 2021.

54 California Endangered Species Act (CESA), Listing of Species Under the California Endangered Species Act, https://fgc.ca.gov/CESA#tcbb2015, accessed September 2021.

55 CDFW, California Natural Diversity Database, “Maps and Data,” accessed September 2021, https://www.wildlife.ca.gov/Data/CNDDB.

56 CDFW, California Interagency Wildlife Task Group, *California Wildlife Habitat Relationships System*, "Pocketed Free-Tailed Bat,” accessed September 2021, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2353.

57 International Union for Conservation of Nature, “Crotch bumble bee,” accessed September 2021, https://www.iucnredlist.org/species/44937582/46440211.

58 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Chapter 3, Design Guidelines.

as visitors approach the Hollywood Park entries. In addition, large-canopy flowering trees and palms will mark major entry points and maintain adequate street visibility.

Landscaping along Prairie Avenue would also include a setback area which would serve as a primary welcoming edge of Hollywood Park. The Prairie Avenue setback will feature drought-tolerant plantings which will add a lush Mediterranean character to the spaces. Specifically, plant materials within the formal entrances will include hedges, colorful flowering groundcovers, and various flowering trees. Taller evergreen hedges and shrubs will be used to create strong entry drives and to screen undesirable views.

4.3.6 THRESHOLDS OF SIGNIFICANCE

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of biological resource impacts. Appendix G of the State CEQA Guidelines indicates that a project would have a significant impact in relation to biological resources if it were to:

Threshold BIO-1: **Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.**

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

4.3.7 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

The proposed Project includes ITC Design Standards and Guidelines (Design Guidelines) and a Construction Commitment Program (CCP) as described in **Section 3.0: Project Description**. The CCP addresses temporary effects during construction of the Project. The Design Guidelines describe the design features of the proposed Project.

4.3.7.1 Project Design Features

The proposed Project includes the following features that address impacts to trees during development of the proposed Project:

PDF AES-2 Tree Replacement

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

- Tree removal and replacement shall comply with the City of Inglewood Municipal Code and the Design Guidelines.

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

PDF AES-4 Tree Placement

- An arborist report surveying the condition and extents of all existing trees in the Project area will be provided to the developer for their use as a baseline in order to produce a final report detailing the most current conditions and proposed handling of all existing trees for the proposed Project.
- Existing flourishing trees (as identified in the arborist report) will remain, where feasible.
- An Approved Plant Palette based on the City's approved street tree list will be used as a basis for all sections of new trees.
- The quantity and species of existing trees removed by the ITC Project will be replaced in accordance with the City's current landscape guidelines.
- Protected species in the Inglewood Municipal Code, Tree Preservation will remain.
- City of Inglewood guidelines for tree spacing will be followed, considering species of trees and the desired canopy coverage.
- Trees will be planted on both sides of the roadway where feasible.

- Trees will be positioned at regular intervals relative to the guideway column supports to create a consistent rhythm.
- On Market Street, trees will be planted at a rhythm and scale to create a continuous visual canopy over the pedestrian realm, where feasible.
- On Manchester Boulevard, trees will be planted at a rhythm consistent with the street trees east and west of the Project, in alignment with the shape of the roadway.
- On Prairie Avenue, trees on the east side will continue the stately rhythm from the Inglewood Cemetery north of Manchester Boulevard. Trees on the west side will be spaced to match the rhythm of the east side and the guideway support structure to the extent feasible.

The environmental impact analysis presented below is based on determinations made in the Initial Study for impacts considered to be potentially significant.

Impact BIO-1: Would the project interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Sensitive animal and plant species and vegetation communities identified by the CNDDB as having the potential to occur within 0.25 mile radius of either side of the proposed Project, including the guideway stations, and MSF sites are largely absent. Due to their mobility, some sensitive bird species may utilize existing mature trees during migration but would not be supported as residents within this urbanized setting. With the exception of the small pond located within the Inglewood Park Cemetery, there are no wetland areas within 0.25 mile radius of either side of the proposed Project, including the guideway, stations, and MSF sites. Vegetation around this pond is nonnative, landscaped vegetation, but waterfowl were observed utilizing the small amount of open water there. No wildlife corridors exist within this area to support movement of wildlife species other than birds.

Construction

Common bird species historically observed in the area of the proposed Project as noted in the CNDDB and eBird database include Brewer's Blackbird (Euphagus cyanocephalus), Black-bellied Plover (Pluvialis squatarola), Tricolored Blackbird (Agelaius tricolor), Canada Goose (Branta canadensis), Northern Rough-winged Swallow (Stelgidopteryx serripennis), American Coot (Fulica americana), Western Bluebird (Sialia mexicana), Lincoln's Sparrow (Melospiza lincolnii), Brown-headed Cowbird (Molothrus ater), Cliff Swallow (Petrochelidon pyrrhonota), Bushtit (Psaltriparus minimus), white-crowned sparrow (Zonotrichia leucophrys), house finch (Carpodacus mexicanus), and the common house sparrow (Passer domesticus).[59] None of these species are sensitive or protected by State or federal law with the exception of the Tricolored Blackbird (*Agelaius tricolor*) which is listed as a threated species under CESA.[60]

The review of the CNDDB notes that the pocketed free-tailed bat (*Nyctinomops femorosaccus*) and crotch bumble bee (*Bombus crotchii*) have been observed within a one-mile area of the proposed Project, including the guideway and stations, and support facility sites. However, observations of neither species have been recently recorded in the area; the last recorded observation of the pocketed free-tailed bat was in 1994 and the crotch bumble bee in 1953.[61] Additionally, the CDFW describes the habitat used by the pocketed free-tailed bat as including rock crevices in cliffs in pinyon-juniper woodlands, desert scrub, desert succulent shrub, desert riparian, desert wash, alkali desert scrub, Joshua tree, and palm oasis.[62] Habitat used by the crotch bumble bee consists of shrubland and grassland.[63] Given that these species occur in specific habitats that do not occur within or near the proposed Project, including the guideway and stations, and support facility sites, as the area is completely developed and paved with no natural plant communities, the pocketed free-tailed bat or crotch bumble bee are not anticipated to be encountered within the proposed Project, including the guideway and stations, and support facility sites during demolition and clearing of existing vegetation, and construction.

The removal of trees will require that the proposed Project meet the requirements of the City's Municipal Code relative to tree preservation. In accordance with the IMC, the proposed Project will be required to plant replacement trees for every protected tree that would be removed within the areas subject to IMC provisions, after having obtained a permit to do so from the City.[64] Replacement trees are required to be

59 Cornell Lab of Ornithology, *eBird*, "Hotspot Map," accessed September 2021, https://ebird.org/home.
60 California Endangered Species Act (CESA), Listing of Species Under the California Endangered Species Act, https://fgc.ca.gov/CESA#tcbb2015, accessed September 2021.
61 CDFW, California Natural Diversity Database, "Maps and Data," accessed September 2021, https://www.wildlife.ca.gov/Data/CNDDB.
62 CDFW, California Interagency Wildlife Task Group, *California Wildlife Habitat Relationships System*, "Pocketed Free-Tailed Bat," accessed September 2021, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2353.
63 International Union for Conservation of Nature, "Crotch bumble bee," accessed September 2021, https://www.iucnredlist.org/species/44937582/46440211.
64 City of Inglewood, IMC Section 12-113, Protected Trees.

replaced at a 1:1 ratio minimum and with a tree of like-size and species or an equal value tree (or trees) as determined by the City. To comply with the requirements of the Tree Preservation Ordinance, an application for a Protected Tree Removal or Cutting Permit must be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee Schedule.[65] The application must be filed and approved prior to any tree removal, relocation or cutting, per City Ordinance.[66]

Several common bird species were historically observed in the area as noted in the CNDDB and eBird database. As discussed previously, a total of approximately 502 trees have been recorded along the ATS. Given the nature that birds will nest in a variety of trees and other locations, the possibility exists that trees located within the ATS may provide habitat for wildlife.

Demolition and clearing of existing vegetation, and construction of the guideway and supporting facilities would result in removal and/or trimming of trees and other ornamental vegetation along the ATS. As such, removal and/or trimming of trees along the ATS could result in impacts to migratory or nesting birds, or raptors protected under the MBTA,[67] CESA,[68] and/or California Fish and Game Code.[69]

Impacts to biological resources from demolition and clearing of existing vegetation, and construction of the proposed Project are potentially significant because tree and vegetation trimming or removal could interfere with the movement of resident or migratory wildlife species that could occur within the area.

Summary of Construction Impacts

The loss of trees along the proposed Project, including the guideway and stations, and support facility sites could reduce nesting opportunities for birds. While preservation of the existing trees will be prioritized, in the case where trimming and tree removal is unavoidable, loss of these trees could be considered a potentially significant impact that could affect wildlife movement.

Operation

Guideway and Stations

65 City of Inglewood, Master Fee Schedule, September 2016.
66 City of Inglewood, Ordinance 12-06 5-8-12 and Ordinance 13-04 11-5-13.
67 U.S. Fish and Wildlife Service (USFWS), Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712; Ch. 128; July 3, 1918; 40 Stat. 755) as amended by: Chapter 634; June 20, 1936; 49 Stat. 1556; P.L. 86-732; September 8, 1960; 74 Stat. 866; P.L. 90-578; October 17, 1968; 82 Stat. 1118; P.L. 91-135; December 5, 1969; 83 Stat. 282; P.L. 93-300; June 1, 1974; 88 Stat. 190; P.L. 95-616; November 8, 1978; 92 Stat. 3111; P.L. 99-645; November 10, 1986; 100 Stat. 3590 and P.L. 105-312; October 30, 1998; 112 Stat. 2956
68 California, Fish and Game Code, Section 2050 et. seq. California Endangered Species Act.
69 California Department of Fish and Wildlife, Fish and Game Code (FGC), Division 4. Birds and Mammals, [3000 - 4904](Division 4 enacted by Stats. 1957, Ch. 456), Part 2. Birds [3500 - 3864] (Part 2 enacted by Stats. 1957, Ch. 456)

Operation of the proposed Project, including ATS trains using the guideway and stations, would be within an urbanized area of the City. Operation of the guideway and stations would not create a significant change in habitat value or nesting sites. The guideway and stations would involve the construction of new buildings and structures, some of which would have windows that could pose obstacles to migratory birds. However, compared to the existing commercial uses to be removed, the guideway and stations would not include an increased number of windows which may impede migratory birds within the vicinity. During operation of the guideway and stations, it is possible that migratory or nesting birds would build nests within the structure or near the area. However, operation of the guideway and stations would not substantially interfere with these nests once built as the majority of the Project components would remain stationary with exception of the ATS train cars.

The Design Guidelines, contained in **Appendix C**, include sustainability guidelines included that define a list of green measures to be incorporated into the design, construction, and operations of the ITC facilities. Exterior lighting associated with these structures would be consistent with the Design Guidelines for the proposed Project. The Design Guidelines would serve to provide for well designed, energy efficient site lighting that contributes to a safe and inviting atmosphere without casting light into the night sky or adjacent properties. This would be accomplished through measures such as light shielding, automatic controls, and architectural compatibility in design, among others. These measures would have the additional effect of minimizing the potential for lighting of the guideway and stations to attract or disorient nocturnal migrating birds.

The guideway and stations would not diminish the chances for long-term survival of bird species or their habitats. Throughout operation vegetation maintenance and abatement would be performed as needed for City street trees and landscaping on the station and MSF sites. No additional tree and/or ornamental vegetation removals are planned and, as such, no significant impacts to nesting birds/raptors would occur from the operation of the guideway and stations.

Support Facilities

Maintenance and Storage Facility

Operation of the MSF would be within an existing retail plaza which is located within an urbanized area of the City. As mentioned previously, a replacement Vons store would be developed on the MSF site prior to construction of the proposed Project. The replacement Vons store would be reduced in size compared to the existing Vons store. Operation of the MSF site would not create a significant change in habitat value or nesting sites. The MSF site would include the construction of an approximately 75,000 square-foot building which would have windows that could pose obstacles to migratory birds. However, compared to the existing commercial uses, the MSF would not include an increased number of windows which may

impede migratory birds in the vicinity. During operation of the MSF site, it is possible that migratory or nesting birds would build nests within the structure or near the area. However, operation of the MSF site would not substantially interfere with these nests once built as the majority of the Project components would remain stationary with exception of the ATS train cars.

Exterior lighting associated with this site would be consistent with the lighting already in place in this area and any new or remodeled lighting would be consistent with the Design Guidelines for the proposed Project. The Design Guidelines would serve to provide for well designed, energy efficient site lighting that contributes to a safe and inviting atmosphere without casting light into the night sky or adjacent properties. This would be accomplished through measures such as light shielding, automatic controls, and architectural compatibility in design, among others. These measures would have the additional effect of minimizing the potential for lighting of the MSF site to attract or disorient nocturnal migrating birds.

The MSF site would not diminish the chances for long-term survival of bird species or their habitats. Throughout operation vegetation maintenance and abatement would be performed as needed for City street trees and the proposed Project's landscaping. No additional tree and/or ornamental vegetation removals are planned and, as such, no significant impacts to nesting birds/raptors would occur from the operation of the MSF site.

Power Distribution System Substations

As discussed previously, the PDS substations would be located within the MSF site and the Prairie Avenue/Hardy Street station site which are analyzed above. The PDS substations would involve the construction of new buildings and structures, some of which would have windows that could pose obstacles to migratory birds. However, as there are no native or nonnative vegetated corridors in the proximity of the proposed Project, the potential impact of these structures on migratory birds is anticipated to be minimal. During operation of the PDS substations, it is possible that migratory or nesting birds would build nests within or near the area. However, operation of the PDS substations would not substantially interfere with these nests once built as the majority of the Project components would remain stationary with exception of the ATS train cars.

Exterior lighting associated with these sites would be consistent with the lighting already in place in this area and any new or remodeled lighting would be consistent with the Design Guidelines for the proposed Project. The Design Guidelines would serve to provide for well designed, energy efficient site lighting that contributes to a safe and inviting atmosphere without casting light into the night sky or adjacent properties. This would be accomplished through measures such as light shielding, automatic controls, and architectural compatibility in design, among others. These measures would have the additional effect of

minimizing the potential for lighting of the PDS substations to attract or disorient nocturnal migrating birds.

The PDS substations would not diminish the chances for long-term survival of bird species or their habitats. Throughout operation vegetation maintenance and abatement would be performed as needed for City street trees and proposed Project's landscaping. No additional tree and/or ornamental vegetation removals are planned and, as such, no significant impacts to nesting birds/raptors would occur from the operation of the PDS substations.

Summary of Operational Impacts

As described, the 0.25-mile radius area surrounding the proposed Project, including the guideway and stations, and support facility sites, is heavily urbanized. Due to lack of suitable habitat, no listed sensitive species are anticipated to occur. Further, there are no sensitive ecological areas, wetlands, or wildlife migratory corridors within the 0.25-mile radius area of the proposed Project.

Operation of the proposed Project would not result in significant impacts to such biological resources with respect to interfering with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impeding the use of native wildlife nursery sites.

Mitigation Measures

The following Mitigation Measures (MMs) have been identified to mitigate the impacts of the Project to less than significant.

Construction

MM BIO-1: **Conservation of Faunal Resources: Nesting Birds/Raptors.** The City shall require demolition and construction contractors to implement the following measures:

- Prior to initiating any demolition and/or construction activities, a nesting bird survey shall be conducted to determine the presence of any nesting birds within 500 feet of demolition and/or construction activities. In addition, nesting bird surveys shall be conducted at least every six (6) months until the completion of construction activities, as specified below.

Nesting bird survey shall include:

- Prior to any demolition and/or construction, and at least every six (6) months during and prior to the raptor nesting season until the completion of construction activities,

January 1 to September 1, a qualified biologist shall conduct a site survey for active nests 30 days prior to any scheduled clearing, demolition, grading, or construction activities. The survey shall be conducted within all trees, manmade structures, and any other potential raptor nesting habitat.

- Prior to any vegetation disturbance between March 1 and September 15, and at least every six (6) months until the completion of construction activities, a qualified biologist shall conduct a survey for nesting birds in all breeding/nesting habitat within the construction or demolitions areas and within 300 feet of all disturbance areas and submit the results of these surveys to the City. The surveys shall be conducted within trees and structures, wherever nesting bird species may be located. Nesting bird surveys shall be conducted no earlier than 30 days prior to the initiation of ground or vegetation disturbance. If no breeding/nesting birds are observed, site preparation, demolition and construction activities may begin. If breeding activities and/or an active bird nest is located, the breeding habitat/nest site shall be fenced by the biological monitor a minimum of 300 feet (500 feet for raptors) in all directions, and this area shall not be disturbed until the nest becomes inactive, the young have fledged, the young are no longer being fed by the parents, the young have left the area, and/or the young shall no longer be impacted. If the qualified biologist determines that a narrower buffer between the demolition and/or construction activities and the observed active nests is warranted, the biologist may submit a written explanation as to why (e.g., species-specific information; ambient conditions and bird's habituation to them; terrain, vegetation, and birds' lines of sight between the demolition and/or construction activities and the nest and foraging areas) to the City and, upon request, the CDFW. Based on the submitted information, the City, acting as the lead agency (and CDFW, if CDFW requests) shall determine whether to allow a narrower buffer.

Operation

No mitigation is required for biological resources during operation of the proposed Project.

Level of Significance after Mitigation

Construction

With implementation of **MM BIO-1**, significant impacts to nesting birds/raptors would be reduced to a level that is less than significant. These measures would prevent substantial interference with the movement of resident or migratory wildlife species through protecting nesting birds/raptors.

Operation

Impacts to biological resources would be less than significant.

Impact BIO-2: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

As detailed under existing conditions, approximately 502 trees exist along the proposed Project, including the guideway and stations, and support facility sites. Loss of these trees would be considered a significant impact if removal and replacement of these trees does not comply with the City's tree preservation ordinance. To comply with the requirements of the Tree Preservation Ordinance, an application for a Protected Tree Removal or Cutting Permit is required to be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee Schedule.[70] This application is required to be filed and approved prior to any tree removal, relocation or cutting, per City Ordinance.[71]

Construction

This section discusses the potential impacts to trees that may be impacted as a result of the proposed Project. As previously noted, construction of the guideway and stations would include equipment staging areas that may reach 22 feet from the guideway. As such, this analysis conservatively assumed that all existing trees within 25 feet of the proposed guideway and stations, and the MSF and PDS substation sites could be removed during construction. The locations of trees with respect to the proposed Project are shown in **Figure 4.3-1: Potential Tree Impacts – Market Street/Florence Avenue Station(a)** through **Figure 4.3-18: Potential Tree Impacts – Prairie Avenue(f)** and are available at the end of this section.

Guideway

Market Street

As discussed previously, a total of approximately 45 trees exist along Market Street. All of these trees are located within the Downtown TOD Plan and qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.[72] The proposed guideway along Market Street in relation to the existing trees is shown in **Figure 4.3-2, Figure 4.3-4, and Figure 4.3-5**. As shown, 35 trees are located within the path of the guideway or within the 25-foot construction equipment staging zone. As such, these trees may be removed during construction.

In accordance with the City's Tree Preservation Ordinance, replacement trees will be planted for every protected tree that would be removed within areas after a permit is approved for tree removal.[73] Replacement trees will be replaced at a 1:1 ratio minimum with a tree of like-size and species or an equal value tree (or trees) as determined by the City. Due to compliance with the requirements of the Tree

70 City of Inglewood, Master Fee Schedule, September 2016.
71 City of Inglewood, Ordinance 12-06 5-8-12 and Ordinance 13-04 11-5-13.
72 City of Inglewood, IMC Section 12-113, Protected Trees.
73 City of Inglewood, IMC Section 12-113, Protected Trees.

Preservation Ordinance, an application for a Protected Tree Removal or Cutting Permit shall be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee Schedule.[74] This application will be filed and approved prior to any tree removal, relocation or cutting, per City Ordinance.[75]

In addition to being subject to the IMC, the trees along Market Street would be developed within the Downtown TOD Plan area, as shown in **Figure 3.0-2**. While the Downtown TOD Plan does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it contains unique provisions and recommendations for the location of tree placement and types of tree species.

In particular, the Downtown TOD Plan calls for Market Street to retain its existing street trees, and the smaller arterial streets including Regent Street and Locust Street may alternate between the Brisbane box (*Lophostemon confertus*), an evergreen tree, and the ginkgo (*Ginkgo biloba*), a deciduous tree.

As the proposed Project will comply with the City's Tree Preservation ordinance, **PDF AES-2**, and **PDF AES-4**, impacts will be less than significant.

Manchester Boulevard

As discussed previously, a total of approximately 152 trees exist along Manchester Boulevard. All of these trees are located within the Downtown TOD Plan and qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.[76] The proposed guideway along Manchester Boulevard in relation to the existing trees is shown in **Figure 4.3-5 through Figure 4.3-7, and Figure 4.3-9 through Figure 4.3-12**. As shown, 64 trees are located within the path of the guideway or within the 25-foot construction equipment staging zone. As such, these trees may be removed during construction.

In accordance with the IMC, the proposed Project shall plant replacement trees for every protected tree that would be removed within areas subject to IMC provisions, after having obtained a permit to do so.[77] Replacement trees shall be replaced at a 1:1 ratio minimum and shall be like-size and species or an equal value tree (or trees) as determined by the City. Due to compliance with the requirements of the Tree Preservation Ordinance, an application for a Protected Tree Removal or Cutting Permit shall be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee Schedule.[78] The application shall be filed and approved prior to any tree removal, relocation or cutting,

74 City of Inglewood, Master Fee Schedule, September 2016.
75 City of Inglewood, Ordinance 12-06 5-8-12 and Ordinance 13-04 11-5-13.
76 City of Inglewood, IMC Section 12-113, Protected Trees.
77 City of Inglewood, IMC Section 12-113, Protected Trees.
78 City of Inglewood, Master Fee Schedule, September 2016.

per City Ordinance.[79] In addition to being subject to the IMC, the trees along Manchester Boulevard would be developed within the Downtown TOD Plan area, as shown in **Figure 3.0-2**. While the Downtown TOD Plan does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it contains unique provisions and recommendations for the location of tree placement and types of tree species.

In particular, the Downtown TOD Plan identifies Manchester Boulevard as a Green Boulevard which would have green dividers that separate bike lanes from traffic lanes. The Downtown TOD Plan states that Green Boulevards should be lined with London Plane trees, or a similar species.

As the proposed Project will comply with the City's Tree Preservation ordinance, **PDF AES-2**, and **PDF AES-4**, impacts will be less than significant.

Prairie Avenue

As discussed previously, a total of approximately 74 trees have been recorded along Prairie Avenue and qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.[80] The proposed guideway along Prairie Avenue in relation to the existing trees is shown in **Figures 4.3-12** through **4.3-18**. As shown, 28 trees are located within the path of the guideway or within the 25-foot construction equipment staging zone. As such, these trees may be removed during construction.

In accordance with the City's Tree Preservation Ordinance, replacement trees will be planted for every protected tree that would be removed within areas after a permit is approved for tree removal.[81] Replacement trees will be replaced at a 1:1 ratio minimum with a tree of like-size and species or an equal value tree (or trees) as determined by the City. Due to compliance with the requirements of the Tree Preservation Ordinance, an application for a Protected Tree Removal or Cutting Permit shall be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee Schedule.[82] This application will be filed and approved prior to any tree removal, relocation or cutting, per City Ordinance.[83]

The HPSP area is located adjacent to the approximately 0.5-mile portion of the Prairie Avenue segment of the guideway. The east side of Prairie Avenue is subject to the HPSP while the west side is subject to the IMC. The guideway and support columns would be located on the west side of Prairie Avenue and would not directly impact the setback of the HPSP area along Prairie Avenue. The relocation of the travel lanes

79 City of Inglewood, Ordinance 12-06 5-8-12 and Ordinance 13-04 11-5-13.
80 City of Inglewood, IMC Section 12-113, Protected Trees.
81 City of Inglewood, IMC Section 12-113, Protected Trees.
82 City of Inglewood, Master Fee Schedule, September 2016.
83 City of Inglewood, Ordinance 12-06 5-8-12 and Ordinance 13-04 11-5-13.

for Prairie Avenue into the setback area would impact existing landscaping. installed in accordance with the design guidelines in the HPSP.[84] The HPSP calls for large columnar evergreen trees such as Afghan pine (*Pinus eldarica*) or Canary Island pine (*Pinus canariensis*) along Prairie Avenue north of Hardy Street. This arrangement will visually reduce the scale of the street and will provide ample shade as visitors approach the Hollywood Park entries. In addition, large-canopy flowering trees and palms will mark major entry points and maintain adequate street visibility.

Landscaping along Prairie Avenue would also include a setback area which would serve as a primary welcoming edge of Hollywood Park. The Prairie Avenue setback will feature drought-tolerant plantings which will add a lush Mediterranean character to the spaces. Specifically, plant materials within the formal entrances will include hedges, colorful flowering groundcovers, and various flowering trees. Taller evergreen hedges and shrubs will be used to create strong entry drives and to screen undesirable views.

As the proposed Project will comply with the City's Tree Preservation ordinance, **PDF AES-2**, and **PDF AES-4**, impacts will be less than significant.

Stations

Market Street/Florence Avenue Station

As discussed previously, a total of approximately 78 trees are associated with the Market Street/Florence Avenue station site. Of these, 58 are located within the site and are considered private property. The remaining 20 trees are public street trees located throughout the perimeter of the site along Florence Avenue, Locust Street, and Regent Street. These trees are located within the Downtown TOD Plan and qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.[85] The proposed Market Street/Florence Avenue station in relation to the existing trees is shown in **Figure 4.3-1** through **Figure 4.3-3**. The area within the site boundaries of the Market Street/Florence Avenue station site would be demolished during construction. As such, these trees may be removed during construction.

In accordance with the City's Tree Preservation Ordinance, replacement trees will be planted for every protected tree that would be removed within areas after a permit is approved for tree removal.[86] Replacement trees will be replaced at a 1:1 ratio minimum with a tree of like-size and species or an equal value tree (or trees) as determined by the City. Due to compliance with the requirements of the Tree Preservation Ordinance, an application for a Protected Tree Removal or Cutting Permit shall be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee

84 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Chapter 3, Design Guidelines.
85 City of Inglewood, IMC Section 12-113, Protected Trees.
86 City of Inglewood, IMC Section 12-113, Protected Trees.

Schedule.[87] This application will be filed and approved prior to any tree removal, relocation or cutting, per City Ordinance.[88]

In addition to being subject to the IMC, the trees within the Market Street/Florence Avenue station site would be developed within the Downtown TOD Plan area, as shown in **Figure 3.0-2**. While the Downtown TOD Plan does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it contains unique provisions and recommendations for the location of tree placement and types of tree species.[89] In particular, the Downtown TOD Plan calls for Market Street to retain its existing street trees, and the smaller arterial streets including Regent Street and Locust Street may alternate between the Brisbane box (*Lophostemon confertus*), an evergreen tree, and the ginkgo (*Ginkgo biloba*), a deciduous tree.

As the Project will comply with the City's Tree Preservation ordinance, **PDF AES-2**, and **PDF AES-4**, impacts will be less than significant.

Prairie Avenue/Manchester Boulevard Station

As discussed previously, the trees identified within the Prairie Avenue/Manchester Boulevard station site have been removed since the 2018 *Tree Inventory* was conducted. The supplemental 2021 *Tree Inventory* identified two additional trees located adjacent to the site along Nutwood Street. These trees qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.[90] The proposed Prairie Avenue/Manchester Boulevard station in relation to the existing trees is shown in **Figure 4.3-12**. The area within the site boundaries of the Prairie Avenue/Manchester Boulevard station site would be disturbed during construction. As such, these trees may be removed during construction.

In accordance with the City's Tree Preservation Ordinance, replacement trees will be planted for every protected tree that would be removed within areas after a permit is approved for tree removal.[91] Replacement trees will be replaced at a 1:1 ratio minimum with a tree of like-size and species or an equal value tree (or trees) as determined by the City. Due to compliance with the requirements of the Tree Preservation Ordinance, an application for a Protected Tree Removal or Cutting Permit shall be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee

87 City of Inglewood, Master Fee Schedule, September 2016.
88 City of Inglewood, Ordinance 12-06 5-8-12 and Ordinance 13-04 11-5-13.
89 City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, November 1, 2016.
90 City of Inglewood, IMC Section 12-113, Protected Trees.
91 City of Inglewood, IMC Section 12-113, Protected Trees.

Schedule.[92] This application will be filed and approved prior to any tree removal, relocation or cutting, per City Ordinance.[93]

As the proposed Project will comply with the City's Tree Preservation ordinance, **PDF AES-2**, and **PDF AES-4**, impacts will be less than significant.

Prairie Avenue/Hardy Street Station

As discussed previously, a total of approximately 32 private trees are associated with the Prairie Avenue/Hardy Street station site. These trees qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.[94] The proposed Prairie Avenue/Hardy Street station in relation to the existing trees is shown in **Figure 4.3-17** and **Figure 4.3-18**. The area within the site boundaries of the Prairie Avenue/Hardy Street station site would be demolished during construction. As such, these trees may be removed during construction.

In accordance with the City's Tree Preservation Ordinance, replacement trees will be planted for every protected tree that would be removed within areas after a permit is approved for tree removal.[95] Replacement trees will be replaced at a 1:1 ratio minimum with a tree of like-size and species or an equal value tree (or trees) as determined by the City. Due to compliance with the requirements of the Tree Preservation Ordinance, an application for a Protected Tree Removal or Cutting Permit shall be filed for removal of the protected trees along with the inspection fee as specified in the City's Master Fee Schedule.[96] This application will be filed and approved prior to any tree removal, relocation or cutting, per City Ordinance.[97]

The HPSP area is located adjacent to the Prairie Avenue/Hardy Street station site. The east side of Prairie Avenue is subject to the HPSP while the west side is subject to the IMC. The Prairie Avenue/Hardy Street station would not be situated within the setback of the HPSP area along Prairie Avenue. Moreover, the street trees along the east side of Prairie Avenue have since been removed for the development of the HPSP area. The HPSP area would be fully developed prior to the construction of the proposed Project. Specifically, Prairie Avenue would be developed per the design guidelines of the HPSP.[98] The HPSP calls for large columnar evergreen trees such as Afghan pine (*Pinus eldarica*) or Canary Island pine (*Pinus canariensis*) along Prairie Avenue north of Hardy Street. This arrangement will visually reduce the scale of

92 City of Inglewood, Master Fee Schedule, September 2016.
93 City of Inglewood, Ordinance 12-06 5-8-12 and Ordinance 13-04 11-5-13.
94 City of Inglewood, IMC Section 12-113, Protected Trees.
95 City of Inglewood, IMC Section 12-113, Protected Trees.
96 City of Inglewood, Master Fee Schedule, September 2016.
97 City of Inglewood, Ordinance 12-06 5-8-12 and Ordinance 13-04 11-5-13.
98 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Chapter 3, Design Guidelines.

the street and will provide ample shade as visitors approach the Hollywood Park entries. In addition, large-canopy flowering trees and palms will mark major entry points and maintain adequate street visibility.

Landscaping along Prairie Avenue would also include a setback area which would serve as a primary welcoming edge of Hollywood Park. The Prairie Avenue setback will feature drought-tolerant plantings which will add a lush Mediterranean character to the spaces. Specifically, plant materials within the formal entrances will include hedges, colorful flowering groundcovers, and various flowering trees. Taller evergreen hedges and shrubs will be used to create strong entry drives and to screen undesirable views.

As the proposed Project will comply with the City's Tree Preservation ordinance, **PDF AES-2**, and **PDF AES-4**, impacts will be less than significant.

Support Facilities

Maintenance and Storage Facility

As discussed previously, a total of approximately 119 trees are located on the MSF site and the adjacent site for the new Vons replacement store. Of these, 116 are located within the site and are considered private property. The remaining 3 trees are public street trees located along Nutwood Street. These trees qualify as protected by meeting the minimum trunk diameter size requirements of the IMC.99 The proposed MSF site in relation to the existing trees is shown in Figure 4.3-7 through Figure 4.3-9. All uses within the MSF site would be demolished prior to construction. As such, these trees may be removed during construction.

The MSF site is located within an area bound by the Downtown TOD Plan which supersedes the provisions within the IMC. While the Downtown TOD Plan does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it does contain unique provisions and recommendations for the location of tree placement and types of tree species.

In particular, the Downtown TOD Plan recommends that Manchester Boulevard be lined with London Plane trees, or a similar species.

As the proposed Project will comply with the City's Tree Preservation ordinance, **PDF AES-2**, and **PDF AES-4**, impacts will be less than significant.

99 City of Inglewood, IMC Section 12-113, Protected Trees.

PDS Substations

The proposed Project would include two PDS substations located at the MSF site and the Prairie Avenue/Hardy Street station site which are analyzed above.

As discussed previously, the MSF site is located within an area bound by the Downtown TOD Plan which supersedes the provisions within the IMC. While the Downtown TOD Plan does not contain provisions regarding the removal of trees or protected trees beyond the requirements of the IMC, it does contain unique provisions and recommendations for the location of tree placement and types of tree species.

In particular, the Downtown TOD Plan recommends that Manchester Boulevard be lined with London Plane trees, or a similar species.

The HPSP area is located adjacent to the Prairie Avenue/Hardy Street station site. The east side of Prairie Avenue is subject to the HPSP while the west side is subject to the IMC. The Prairie Avenue/Hardy Street station would not be situated within the setback of the HPSP area along Prairie Avenue. The HPSP area would be fully developed prior to the construction of the proposed Project. Specifically, Prairie Avenue would be developed per the design guidelines of the HPSP.[100]

As the proposed Project will comply with the City's Tree Preservation ordinance, **PDF AES-2**, and **PDF AES-4**, impacts will be less than significant.

Summary of Construction Impacts

As discussed above, the proposed Project will comply with the City's Tree Preservation ordinance, **PDF AES-2**, and **PDF AES-4**. Impacts from the removal of trees to construct the proposed Project will be less than significant.

Operation

Guideway and Stations

Operation of the proposed Project, including the guideway and the three proposed stations, support facility sites, including trains using the guideway and stations, would be within an urbanized area of the City. The operation of the guideway and stations would introduce different land uses within the public rights-of-way and adjacent properties co-located with the proposed Project. The guideway and stations would introduce new ornamental landscaping, as well as new lighting associated with the guideway, stations, and passenger access areas. The new ornamental trees and landscaping could be illuminated by

100 City of Inglewood, *Hollywood Park Specific Plan*, adopted July 8, 2009, amended September 23, 2014, and further amended February 24, 2015., Chapter 3, Design Guidelines.

nighttime lighting and would be located in highly urbanized, active locations. Because the proposed Project is located in a highly urbanized area with existing light, noise, and activity, increased lighting, noise, and activity associated with the guideway and stations would not significantly affect the activities of birds within the area. Additionally, birds that occur within the existing area are highly adapted to living within urbanized areas; the guideway and stations would be consistent with the urbanized developments in the vicinity.

As previously noted, the City of Inglewood Tree Preservation Ordinance governs the removal or modification of protected trees within the City.[101] The proposed Project would follow the applicable program (Downtown TOD, HPSP, and IMC as applicable) for the area the guideway and stations it is under. Operation of the guideway and stations would require landscaping maintenance activities; however, no additional tree and/or ornamental vegetation removals are planned. As such, no significant impacts regarding conflict with local policies or ordinances protecting biological resources would occur from the operation of the guideway and stations.

Support Facilities

Maintenance and Storage Facility

Operation of the MSF site would be within an urbanized area of the City. As mentioned previously, a replacement Vons store would be developed on the MSF site prior to construction of the proposed Project. The operation of the MSF site would introduce different land uses within the public rights-of-way and adjacent properties along Manchester Boulevard. The MSF site would introduce new ornamental landscaping, as well as new lighting associated with passenger access areas and support facilities. The new ornamental trees and landscaping could be illuminated by nighttime lighting and would be located in highly urbanized, active locations. Because the proposed Project is located in a highly urbanized area, increased lighting, noise, and activity associated with MSF site would not significantly affect the activities of birds within the area. Additionally, birds that occur within the existing area are highly adapted to living within urbanized areas; the MSF would be consistent with the urbanized developments in the vicinity.

As discussed previously, the City of Inglewood Tree Preservation Ordinance governs the removal or modification of protected trees within the City.[102] Operation of the MSF site would require landscaping maintenance activities similar to existing uses; however, no additional tree and/or ornamental vegetation removals are planned. As such, no significant impacts regarding conflict with local policies or ordinances protecting biological resources would occur from the operation of the MSF site.

101 City of Inglewood Tree Preservation Ordinance (IMC Section Chapter 12, Article 32).
102 City of Inglewood Tree Preservation Ordinance (IMC Section Chapter 12, Article 32).

PDS Substations

The proposed Project would include two PDS substations located at the MSF site and the Prairie Avenue/Hardy Street station site which are analyzed above.

As discussed previously, these sites could introduce new ornamental landscaping, as well as new lighting associated with p access areas and support facilities. The new ornamental trees and landscaping could be illuminated by nighttime lighting and would be located in highly urbanized, active locations. Because the proposed Project is located in a highly urbanized area, increased lighting, noise, and activity associated with these sites would not significantly affect the activities of birds within the area. Additionally, birds that occur within the existing area are highly adapted to living within urbanized areas; these sites would be consistent with the urbanized developments in the vicinity.

As previously noted, the City of Inglewood Tree Preservation Ordinance governs the removal or modification of protected trees within the City.[103] Operation of these sites would require landscaping maintenance activities similar to existing uses; however, no additional tree and/or ornamental vegetation removals are planned. As such, no significant impacts regarding conflict with local policies or ordinances protecting biological resources would occur from the operation of these sites.

Summary of Operational Impacts

Operation of the proposed Project including the guideway and stations, support facility sites, would not conflict with any existing policies or ordinances protecting biological resources including the City's Tree Preservation Ordinance, or the provisions identified in either the Downtown TOD or HPSP. Impacts would be less than significant.

Mitigation Measures

Construction

No mitigation is required due to conflicts existing policies or ordinances protecting biological resources.

Operation

No mitigation is required due to conflicts existing policies or ordinances protecting biological resources.

103 City of Inglewood Tree Preservation Ordinance (IMC Section Chapter 12, Article 32).

Level of Significance after Mitigation

Construction

Impacts due to conflicts existing policies or ordinances protecting biological resources would be less than significant.

Operation

Impacts due to conflicts existing policies or ordinances protecting biological resources would be less than significant.

4.3.8 CUMULATIVE IMPACTS

Cumulative development projects in the vicinity of the proposed Project, described in **Section 4.0: Environmental Impact Analysis**, *4.0.6: Cumulative Assumptions*, would result in potentially significant impacts to biological resources.

The City of Inglewood is located within a highly developed and urbanized area and potential biological resources are limited to a few small parks and the Inglewood Park Cemetery. These parks are primarily landscaped areas and wildlife species utilizing the parks are mostly those adapted to living in an urban environment. The geographic scope of analysis for cumulative impacts related to biological resources varies for each resource. Regarding the movement of wildlife species, which are limited to common species found in urban environments as identified above, it is considered to be the vicinity surrounding the proposed Project.

The proposed Project is located entirely in a disturbed and/or developed area and supports limited biological resources, with the exception of trees and ornamental shrubs that may provide nesting habitat for birds, including trees that are protected in accordance with the local municipal code. The geographic scope of analysis for cumulative impacts related to protected trees is the City. While migratory birds may occur within the proposed Project, including the guideway and stations, support facility sites, the quality of the habitat is low due to the absence of native habitat and open space, the level of disturbance (existing levels of urban activity and lighting from adjacent uses), and a lack of suitable habitat in the vicinity. As such, migratory bird habitat within the footprint of the proposed Project and vicinity is limited to mainly nonnative ornamental trees.

It is likely that the common, urbanized species, including migratory species, would continue to use the vegetation that exists within the urbanized areas that surround the proposed Project. Therefore, the loss of trees from demolition and construction of the proposed Project would not result in a substantial or significant decline of bird nesting habitat in the region. Implementation of mitigation measures would

ensure that bird nests are avoided during the demolition or construction phases of the proposed Project. Compliance with the IMC would require that replacement trees and landscaping that would ensure that the urban habitat for birds is maintained.

The proposed Project, in conjunction with cumulative development within the vicinity of the proposed Project, demolition, construction or operational activities would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

Therefore, the Project's potential to contribute to a significant cumulative impact related to biological resources would not be cumulatively considerable.

4.3.9 CONSISTENCY WITH CITY OF INGLEWOOD GENERAL PLAN

The proposed Project will comply with the City's Tree Preservation ordinance, **PDF AES-2**, and **PDF AES-4**.

The Conservation Element of the City's General Plan was adopted in October 1997 and addresses the conservation, development, and use of natural resource including water, soils, lakes, and mineral deposits.[104] The Conservation Element notes that resources which are typically addressed in conservation elements, including biological resources such as forests, wildlife, fisheries, shorelines, and agricultural land, are not found in Inglewood.

The Land Use Element of the City's General Plan describes tree masses as an important component the physical environment of the City.[105] The Land Use Element states that trees are not merely aesthetic elements of the urban setting, but also provide beneficial effects such as noise attenuation, amelioration of air pollution and dust, and temperature control. As such, landowners are encouraged to plant trees to realize these benefits. The General Plan does not address biological resources any further.

The proposed Project would comply with the requirements of the IMC Tree Preservation Ordinance, **PDF AES-2**, and **PDF AES-4**. Implementation of incorporated features and actions of the CCP would address the removal of trees and the requirements for the replacement of the loss of protected trees at a 1:1 ratio per City requirements. As such, the proposed Project would help ensure the maintenance of a robust urban forest in the City and would not conflict with any goal, objective, or policy of the City's General Plan related to biological resources.

104 City of Inglewood *General Plan*, "Conservation Element" (1997).
105 City of Inglewood *General Plan*, "Land Use Element" (adopted 1980, amended 1986, 2009, and 2016).