



APPENDIX B

Summary of Comments on Revised NOP



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September 14, 2020

Mindy Wilcox, Planning Manager
City of Inglewood
One W. Manchester Boulevard, 4th Floor
Inglewood, CA 90301

Re: 2018071034, Inglewood Transit Connector Project, Los Angeles County

Dear Ms. Wilcox:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines § 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

Governor's Office of Planning & Research

Sep 18 2020

STATE CLEARINGHOUSE

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a.** A brief description of the project.
 - b.** The lead agency contact information.
 - c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a.** Alternatives to the project.
 - b.** Recommended mitigation measures.
 - c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).

- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
 - a.** Type of environmental review necessary.
 - b.** Significance of the tribal cultural resources.
 - c.** Significance of the project's impacts on tribal cultural resources.
 - d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).



- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe. (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.



3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

DEPARTMENT OF TRANSPORTATION

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Making Conservation
a California Way of Life.

Governor's Office of Planning & Research

October 12, 2020

Oct 13 2020

Mindy Wilcox
City of Inglewood
Planning Division
One W. Manchester Boulevard
Inglewood, CA 90301

STATE CLEARINGHOUSE

RE: Inglewood Transit Connector Project –
Recirculated Notice of Preparation (NOP)
SCH # 2018071034
GTS # 07-LA-2018-03366
Vic. LA-405/PM: 23.331

Dear Mindy Wilcox:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The project is an automated people mover (APM) to transport riders between the regional Metro Rail system (Crenshaw Line), Downtown Inglewood, the Forum, the Los Angeles Sports and Entertainment District, and the future Inglewood Basketball and Entertainment Center. The project would consist of elevated dual guideways to allow for continuous APM trains to travel in each direction. It would also include support facilities, such as an approximately 78,000 square feet maintenance and storage facility, and two traction power substations facilities to provide the system's electrical power. Ultimately the project is planned to have a ridership capacity of 11,500 passengers per hour. The City of Inglewood is the Lead Agency under the California Environmental Quality Act (CEQA).

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The project is located approximately 1.5 miles away from the Interstate 405 (I-405) and Manchester Boulevard interchange, and approximately 2 miles away from the Interstate 105 (I-105) ramps at Prairie Avenue in Inglewood.

From reviewing the NOP, Caltrans has the following comments:

- Caltrans wrote a letter in response to the original NOP for this project in 2018. Since then, the project scope has changed and the implementation deadline for Senate Bill (SB) 743 has passed. SB 743 (2013) mandates that Vehicle Miles Traveled (VMT) rather than Level of Service be used as the primary metric for determining the transportation impacts of projects under CEQA. Thus, Caltrans has reviewed the recirculated NOP from a VMT perspective.
- For information on determining transportation impacts in terms of VMT on the State Highway System, see the *Technical Advisory on Evaluating Transportation Impacts in CEQA* by the California Governor's Office of Planning and Research (OPR), dated December 2018: http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.
- The City can also refer to Caltrans' updated *Vehicle Miles Traveled-Focused Transportation Impact Study Guide* (TISG), dated May 2020 and released on Caltrans' website in July 2020: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>. Caltrans' new TISG is largely based on the OPR 2018

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Mindy Wilcox
October 12, 2020
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Technical Advisory.

- The updated TISG states, "Additional future guidance will include the basis for requesting transportation impact analysis that is not based on VMT. This guidance will include a simplified safety analysis approach that reduces risks to all road users and that focuses on multi-modal conflict analysis as well as access management issues." Since releasing the TISG, Caltrans has released interim safety analysis guidance, dated July 2020 and found here, for the City's reference: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-07-01-interim-ldigr-safety-guidance-a11y.pdf>.
- Caltrans looks forward to reviewing the VMT analysis for this project in the forthcoming DEIR. As discussed in Caltrans' new TISG, Caltrans strongly recommends undertaking project VMT analysis, significance determination, and potential mitigation in a manner consistent with OPR's Technical Advisory.

The following information is included for your consideration.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Furthermore, Caltrans encourages Lead Agencies to implement Transportation Demand Management (TDM) strategies that reduce VMT and Greenhouse Gas emissions. For examples of TDM options to further reduce this project's VMT, please refer to:

- The 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), available at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>, or
- *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8) by the Federal Highway Administration (FHWA), available at <https://ops.fhwa.dot.gov/publications/fhwahop12035/index.htm>.

Also, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans recommends that the project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause delays on any State facilities, please submit a construction traffic control plan detailing these delays for Caltrans' review.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS # 07-LA-2018-03366.

Sincerely,

Miya Edmonson

MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse

Inglewood Transit Connector
Revised Notice of Preparation of EIR – Metro Comments
October 12, 2020

CL 3



Metro

Los Angeles County
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October 12, 2020

Mindy Wilcox, AICP
City of Inglewood, Planning Division
One West Manchester Boulevard, 4th Floor
Inglewood, CA 90301
Sent by Email: inglewoodtransitconnector@cityofinglewood.org

RE: Inglewood Transit Connector Project
Revised Notice of Preparation (NOP) of Environmental Impact Report (EIR)

Dear Ms. Wilcox:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Inglewood Transit Connector Project (Project) located in the City of Inglewood (City). Metro's aim is to create and maintain a world-class transportation system that focuses on providing an excellent customer experience and enhancing the quality of life for those who live, work, and play within Los Angeles County. As the public mass transportation planner, builder and operator, Metro is constantly working to deliver a regional system that supports increased transportation options and associated benefits, such as improved mobility options, air quality, health and safety, and access to opportunities.

The purpose of this letter is twofold: firstly, to provide the City with specific detail on the scope and content of environmental information that should be included in the EIR for the Project per Metro's area of statutory responsibility pursuant to the California Environmental Quality Act (CEQA)¹, and secondly, to encourage close coordination on Project design and development to ensure a quality interface between the Project and Metro's Downtown Inglewood Station along the Crenshaw/LAX Line (K Line). Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.²

Metro recognizes the Project's significance to the City and the greater Los Angeles County region. Metro and the City have been collaborating closely on several efforts, including the K (Crenshaw/LAX) Line, Metro-funded transit-oriented development (TOD) Specific Plans, the Inglewood First/Last Mile Plan, the Centinela/Florence Grade Separation, and event transportation demand management for SoFi Stadium and the Inglewood Basketball and Entertainment Center. We are committed to a collaborative approach with respect to this Project. In particular, we appreciate the NOP consultation meeting held between our respective staffs on September 28, 2020. Metro will follow up with the Project Team to assemble an interdisciplinary working group to address future technical and operational issues as the Project design advances.

Project Description

The Project would include an automated people mover (APM) system to transport riders from the regional Metro Rail system (K Line) to Downtown Inglewood, the Forum, and the Los Angeles Sports and Entertainment District (LASED) which includes the new SoFi stadium (recently opened in the Fall of 2020), the proposed Inglewood Basketball and Entertainment Center (IBEC) and new retail, housing, and employment centers. The

¹ See Sections 15082(b) and 15086(a) of the Guidelines for Implementation of CEQA (Cal. Code of Regulations, Title 14, Ch. 3).

² See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

3-1

Inglewood Transit Connector
Revised Notice of Preparation of EIR – Metro Comments
October 22, 2020

Project will consist of elevated dual guideways to allow for continuous APM trains to travel in each direction. There will likely be several trains operating at any time, depending upon ridership needs. As currently envisioned, the proposed Project will have up to three stations, as follows: 1) Market Street/Florence Avenue Station; 2) Prairie Avenue/Pincay Drive Station, and 3) Prairie Avenue/Hardy Street Station.

Station design will be established by passenger demand volumes under typical peak conditions, in addition to increased demands during special events. Station design will also take into account the potential for service disruptions and emergency evacuation requirements. Stations would provide for pedestrian access to the elevated guideway from street level via existing sidewalk and pedestrian travel areas adjacent to the station locations. Final station locations and configurations will be determined during the design process. A pedestrian bridge linkage will connect the Market Street/Florence Avenue Station with the K Line on the north side of Florence Avenue.

The proposed Project will include support facilities to provide for a maintenance and storage facility (MSF), and traction power substations (TPSS) that would be located adjacent to the elevated guideway alignment but outside the street rights-of-way. The MSF would be an approximately 78,000 square foot structure to provide for maintenance activities and train storage. Two TPSS facilities would provide electrical power for system operation. The MSF location south of the intersection of Hillcrest Boulevard and Manchester Boulevard would include a TPSS. A second TPSS would be located on the Civic Center site located east of Prairie Avenue and south of Arbor Vitae Street.

Recommendations for EIR Scope and Content

To address potential impacts to Metro's transit system and infrastructure, the EIR for the Project should analyze and discuss the following topics, without limitation. Impacts should be described and mitigated to the maximum extent feasible:

1. Rail Transit Service Capacity: Coordination on passenger flows between the Project and the K Line will be critical to the success of the Project. Projected service headways and passenger throughput under different scenarios for the Project should be discussed. As currently designed and constructed, the K Line will provide 6-minute headways using two-car trains. Due to physical constraints on station and systems design, it is not possible to run more frequent service or longer trains. The EIR should incorporate this information into the Project's design and EIR analysis.
2. Interface between Metro Downtown Inglewood Station and APM Station: Additional information and discussion is needed on the interface between the Market/Florence APM Station and Metro's Downtown Inglewood Station. Key interface issues that need further information include: pedestrian volumes, circulation patterns, security, and queuing accommodations for patrons transferring from the APM to the Metro Station, as well as the proposed pedestrian bridge that will link the two stations and any touchdown points for the bridge on Metro's property. To help ensure a seamless connection between the two systems, Metro would like to be review performance standards proposed as part of the City's proposed P3 delivery method.
3. Bus Service and Intermodal Connections: The EIR should discuss current and projected Metro bus service and whether changes to bus service and bus stop locations are proposed by the Project. The Project design should consider and accommodate transfer activity between bus and rail lines that will occur along sidewalks and public spaces. Metro has completed the Metro Transfers Design Guide, a best practices document on transit improvements. This can be accessed online at <https://www.metro.net/projects/systemwidedesign>.
4. Centinela/Florence Avenues Grade Separation Project: The EIR should take into account construction activities for the Centinela/Florence Avenues Grade Separation Project, which are projected to occur between Summer 2022 and Summer 2025, and will likely overlap with construction of the APM Project. Issues to be coordinated and considered may include without limitation: construction schedule; need for right-of-way (ROW) construction staging areas and construction staging plan; construction site

Inglewood Transit Connector
Revised Notice of Preparation of EIR – Metro Comments
October 12, 2020

safety and clearance from adjacent Metro properties, rail ROW and train operations (e.g., OCS poles and wires); construction traffic management (roadway closure, traffic detour, relocation of bus stops); shared utilities (if any), etc.

3-5

Metro looks forward to further discussions and coordination with the City on this Project. If you have any questions regarding this letter, please contact me at lings@metro.net.

Sincerely,


Shine Ling, AICP
Manager, Development Review
Transit Oriented Communities

cc: David Mieger, Senior Executive Officer, Long Range & Mobility Corridors Planning
Holly Rockwell, Senior Executive Officer, Real Property Management & Development
Conan Cheung, Senior Executive Officer, Bus Service Planning
Nicholas Saponara, Executive Officer, Transit Oriented Communities
Dolores Roybal Saltarelli, Deputy Executive Officer, Mobility Corridors Planning

CL 4



SENT VIA E-MAIL:

October 8, 2020

inglewoodtransitconnector@cityofinglewood.org
mwilcox@cityofinglewood.org

Mindy Wilcox, AICP, Planning Manager
City of Inglewood, Planning Division
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Inglewood, California 90301

**Revised Notice of Preparation of an Environmental Impact Report for the
Inglewood Transit Connector Project (Proposed Project) (SCH No.: 2018071034)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send a copy of the EIR upon its completion and public release directly to South Coast AQMD as copies of the EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

4-1

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website¹ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod² land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

4-2

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds³ and localized significance thresholds (LSTs)⁴ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

4-3

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of

¹ South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

² CalEEMod is available free of charge at: www.caleemod.com.

³ South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁴ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

Mindy Wilcox

2

October 8, 2020

heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

4-4

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment⁵.

4-5

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

4-6

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook¹, South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan⁶, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy⁷.

4-7

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS
LAC200916-09
Control Number

⁵ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁶ South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

⁷ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocial.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

10/13/2020

INGLEWOOD TRANSIT CONNECTOR PROJECT INITIAL ST... - inglewoodtransitconnector

INGLEWOOD TRANSIT CONNECTOR PROJECT INITIAL STUDY NOP

CL 5

Toan Duong <TDUONG@dpw.lacounty.gov>

Thu 10/8/2020 10:29 AM

To:inglewoodtransitconnector <inglewoodtransitconnector@cityofinglewood.org>;

Cc:Jose Suarez <JSUAREZ@dpw.lacounty.gov>; Justin Dulay <JDulay@dpw.lacounty.gov>; Jason Rietze <JRietze@dpw.lacounty.gov>;
Long Thang <LTHANG@dpw.lacounty.gov>; Miguel Garibay Jr <MiGaribay@dpw.lacounty.gov>;

TO: City of Inglewood
Planning Division
One W. Manchester Boulevard, 4th floor
Inglewood, CA 90301

INGLEWOOD TRANSIT CONNECTOR PROJECT REVISED NOTICE OF PREPARATION AND INITIAL STUDY ENVIRONMENTAL PLAN (RPPL2020006654)

Thank you for the opportunity to review the Initial Study and Notice of Preparation (IS/NOP) for the Inglewood Transit connector project. The project proposes an automated people mover (APM) transporting riders to and from the regional Metro Rail system (Crenshaw Line) to Downtown Inglewood, the Forum, the new NFL stadium scheduled to open in the Fall of 2020, and the future Inglewood Basketball and Entertainment Center. The proposed Project consists of elevated dual guideways to allow for continuous APM trains to travel in each direction with a ridership capacity of 11,500 passengers per hour.

5-1

The Los Angeles County Flood Control District (LACFCD) has reviewed the IS/NOP and has no objection to the proposed project. The LACFCD has the following comments for your consideration:

1. Section 2.10, Hydrology and Water Quality, Page 22

Clarify if or how the proposed project improvements will impact any LACFCD facilities, including but not limited to the existing Drainage District Improvements (DDI) No. 008 and Project No. 4402-Unit 1, Line C.

5-2

2. Section 2.19, Utilities and Service Systems, Page 102

There is an existing LACFCD maintained storm drain along Prairie Avenue within the project site. It is not clear if the proposed guideway will be located over the LACFCD's drain. Clarify if or how the guideway will interfere with the LACFCD's operation and maintenance activities of the storm drain.

5-3

10/13/2020

INGLEWOOD TRANSIT CONNECTOR PROJECT INITIAL ST... - inglewoodtransitconnector

3. General Comment – LACFCD Permit

If any project components affects the LACFCD facilities or right of way, a permit from LACFCD will be required.

For questions regarding comments 1-3, please contact Miguel Garibay of Public Works, Stormwater Planning Division at (626) 458-4333 or migaribay@pw.lacounty.gov.

We request the opportunity to review all future environmental documents regarding this project. Please email related documents to Jose Suarez of Public Works, Land Development Division at jsuarez@pw.lacounty.gov.

Sincerely,

Toan Duong

Civil Engineer
Los Angeles County Public Works
Office: (626) 458-4921



5-4

CL 6



**COUNTY OF LOS ANGELES
 FIRE DEPARTMENT**

1320 NORTH EASTERN AVENUE
 LOS ANGELES, CALIFORNIA 90063-3294
 (323) 881-2426
 www.fire.lacounty.gov

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HILDA L. SOLIS
 FIRST DISTRICT

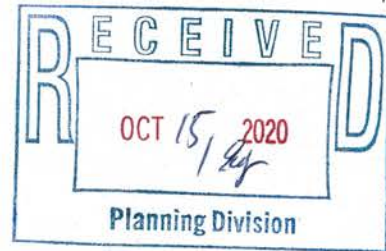
MARK RIDLEY-THOMAS
 SECOND DISTRICT

SHEILA KUEHL
 THIRD DISTRICT

JANICE HAHN
 FOURTH DISTRICT

KATHRYN BARGER
 FIFTH DISTRICT

DARYL L. OSBY
 FIRE CHIEF
 FORESTER & FIRE WARDEN



October 8, 2020

Mindy Wilcox, Planning Manager
 City of Inglewood
 Planning Division
 One West Manchester Boulevard
 Inglewood, CA 90301

Dear Ms. Wilcox:

REVISED NOTICE OF PREPARATION, "INGLEWOOD TRANSIT CONNECTOR PROJECT," IS A PROPOSED AUTOMATED PEOPLE MOVER MASS-TRANSIT LINE CONNECTING THE CITY OF INGLEWOOD TO THE GREATER SOUTHERN CALIFORNIA REGION, THE PROJECT WILL INCLUDE A REVISED 1.6-MILE TRANSIT GUIDEWAY, THREE STATION, APM TRAINS, AND SUPPORT FACILITIES INCLUDING A MAINTENANCE STORAGE FACILITY AND TWO TRACTION POWER SUBSTATIONS, INGLEWOOD, FFER 2020006727

The Revised Notice of Preparation has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

Under 2.15 **Public Services**, a.1. Fire Protection, paragraph two, sentence six is incorrect. If the author was indicating the number of personnel on-duty daily within the City of Inglewood, that number is 21 firefighting staff on-duty daily at fire stations located within Inglewood's boundaries.

6-1

6-2

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

- | | | | | | | |
|--------------|-------------|------------------|----------------------|----------------------|-----------------------|------------------|
| AGOURA HILLS | CALABASAS | EL MONTE | INDUSTRY | LAWDALE | PARAMOUNT | SIGNAL HILL |
| ARTESIA | CARSON | GARDENA | INGLEWOOD | LOMITA | PICO RIVERA | SOUTH EL MONTE |
| AZUSA | CERRITOS | GLENDORA | IRVINDALE | LYNWOOD | POMONA | SOUTH GATE |
| BALDWIN PARK | CLAREMONT | HAWAIIAN GARDENS | LA CANADA-FLINTRIDGE | MALIBU | RANCHO PALOS VERDES | TEMPLE CITY |
| BELL | COMMERCE | HAWTHORNE | LA HABRA | MAYWOOD | ROLLING HILLS | WALNUT |
| BELL GARDENS | COVINA | HERMOSA BEACH | LA MIRADA | NORWALK | ROLLING HILLS ESTATES | WEST HOLLYWOOD |
| BELLFLOWER | CUDAHY | HIDDEN HILLS | LA PUENTE | PALMDALE | ROSEMEAD | WESTLAKE VILLAGE |
| BRADBURY | DIAMOND BAR | HUNTINGTON PARK | LAKEWOOD | PALOS VERDES ESTATES | SAN DIMAS | WHITTIER |
| | DUARTE | | LANCASTER | | SANTA CLARITA | |

Mindy Wilcox, Planning Manager
October 8, 2020
Page 2

Sentence seven of paragraph two should be corrected to state that, "An Assistant Fire Chief oversees the three battalions that are within Division 6."

For any questions regarding this response, please contact Loretta Bagwell, Planning Analyst, at (323) 881-2404 or Loretta.Bagwell@fire.lacounty.gov.

LAND DEVELOPMENT UNIT:

1. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.
2. The proposed Automated People Mover shall comply with NFPA 130: Standard for Fixed Guideway Transit and Passenger Rail Systems.
3. Changes to the existing public water system such as fire hydrants, and water mains, for firefighting purposes shall be submitted to the County of Los Angeles Fire Department's Fire Prevention, Land Development Unit for review and approval.

Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department Land Development Unit's, Inspector Nancy Rodeheffer at (323) 890-4243.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Joseph Brunet at (818) 890-5719.



6-3



6-4

Mindy Wilcox, Planning Manager
October 8, 2020
Page 3

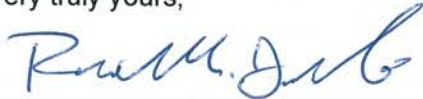
HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments or requirements for the project at this time.

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



RONALD M. DURBIN, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

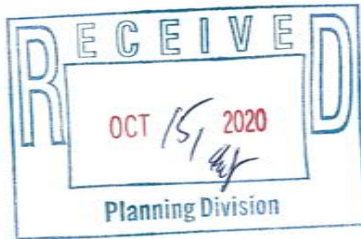
RMD:ac

COUNTY OF LOS ANGELES
FIRE DEPARTMENT
FORESTRY DIVISION
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ZIP 90063
041L12204521



Mindy Wilcox, Planning Manager
City of Inglewood
One West Manchester Boulevard
Inglewood, CA 90301

9030181764 0033



Ms. Mindy Wilcox
October 12, 2020

CL 7



INGLEWOOD UNIFIED SCHOOL DISTRICT

401 S. Inglewood Avenue, Inglewood, California 90301 phone: (310) 419-2700

COUNTY ADMINISTRATOR
Erika F. Torres, Ed.D., MSW

October 12, 2020

Via e-mail and U.S. Mail

BOARD OF EDUCATION

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Member, Trustee Area 4

Ms. Mindy Wilcox
AICP, Planning Manager
City of Inglewood
Planning Division
One W. Manchester Boulevard, 4th Floor
Inglewood, CA 90301
inglewoodtransitconnector@cityofinglewood.org

RE: Inglewood Transit Connector Project Initial Study - State Clearinghouse
No. 2018071034

Dear Ms. Wilcox:

ADMINISTRATION

Raphael Guzman
Chief Business Official

Hedieh Khajavi
Chief Human Resources Officer

Bernadette Lucas, Ed.D.
Chief Academic Officer

Norberto J. Perez
Chief Operating Officer

The Inglewood Unified School District ("District") thanks the City of Inglewood ("City") for providing the Notice of Preparation for the September 2020 Revised Initial Study ("RIS") on the proposed Inglewood Transit Connector Project ("Project"). I would also like to personally thank Mayor James Butts and his staff for providing thorough and transparent information about the RIS to the District and for coordinating a meeting at the senior administrative and staff levels to better understand the Project and its impacts.

The District very much supports the Project, which will play an important role in ongoing revitalization efforts by providing convenient, reliable, and efficient public transportation to major activity centers within the City, to the benefit of the Inglewood community, and reduce extra vehicular traffic.

The District has reviewed the RIS and would like the City to consider in the upcoming Draft Environmental Impact Report ("EIR") the Project's potentially significant impacts on the following four District schools: (1) Crozier Middle School & City Honors High School (cumulatively, "Crozier") which is within 1,300 feet from the Project's Market Street/Florence Ave Station and within 996 feet from the Project's railroad alignment; (2) Inglewood High School ("Inglewood") which is within 1,000 feet from the Project's railroad alignment; (3) Kelso Elementary School ("Kelso") which is directly adjacent to the Project's Prairie Ave/Pincay Drive Station; and (4) Inglewood Adult School, which is within 800 feet of the Project's railroad alignment.

Ms. Mindy Wilcox
October 12, 2020
Page 5

Children are much more susceptible than adults to impacts caused by development. Given the large population of children at public school sites, special consideration of a project's potential impacts on a school site is necessary. Understanding this, the California Department of Education ("CDE") has established specific regulations for public school sites to protect students from undue development hazards. These regulations set forth in Title 5 California Code of Regulations section 14010 et seq. set forth specific setbacks and required studies of recognized hazards to the safety and learning environment of students. The encroachment of these hazards can render a public school site unusable for educational purposes. Thus, the specifics of these regulations must be evaluated for Crozier, Inglewood, and Kelso. Additionally, the Project's potential impacts on any other District facility needs to be included, as required by the State's environmental review process. As such, we reference "three" schools (Crozier, Inglewood, and Kelso) when discussing CDE specific requirements and "four" schools (the three schools plus Inglewood Adult School) when discussing general California Environmental Quality Act ("CEQA") considerations. We have identified the following six types of Project impacts to our four schools to be considered and analyzed: (1) aesthetics, (2) air quality, (3) hazards and hazardous materials, (4) noise, (5) traffic, and (6) utilities.

7-2

The District wishes to emphasize that its comments are meant to assist the City in evaluating the Project's potential impacts to the District's four schools, and to ensure that District students' safety and education are not significantly impacted by the Project.

1. AESTHETICS.

The RIS notes that the Project would run trains on elevated tracks and have elevated stations. The District is concerned that Kelso's adjacency to the Prairie Ave/Pincay Drive Station could be a visual distraction to Kelso's students by the frequent movement of trains into and out of the station. Students are immediately drawn to movement and accompanying sounds, so the Project's trains could draw student's attention away from their lessons whether they are held in indoor classrooms or outside. The Project should include a mitigation measure to screen the elevated Prairie Ave/Pincay Drive Station and adjacent elevated railroad tracks from the view of Kelso's students.

7-3

Additionally, at ground level, the influx of patrons walking to and from the station or other persons loitering in the vicinity of the station could provide an opportunity for these people to observe Kelso's students. A mitigation measure should be included to visually shield potential onlookers from observing Kelso's students.

2. AIR QUALITY.

Per Education Code section 17213, a school shall only be located where, "The health risks from the facilities or other pollution sources do not and will not constitute an actual or potential endangerment of public health to persons who would attend or be employed at the school." (*Id.* § 17213(c)(2)(B).) For health risks from air pollution, Education Code section 17213(b) instructs that sources of Toxic Air Contaminants ("TACs") within ¼ mile of a school requires direct analysis. "Hazardous air emissions" means emissions into the ambient air of air contaminants that have been identified as a TAC by the State Air Resources Board or by the air pollution control officer for the jurisdiction in which the project is located." (*Id.* § 17213(d)(1).) Particulate emissions from diesel-fueled engines ("DPM") is identified as a TAC. (<https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants>)

7-4

Ms. Mindy Wilcox
October 12, 2020
Page 5

Per the RIS, the Project is a hazardous air emitter. It obliquely identifies Kelso as a sensitive air quality receptor and explains that a Health Risk Assessment (“HRA”) will be conducted “to consider impacts associated with exposure to TACs on nearby receptors during both construction and operation.” (RIS, p. IS-52.) Since the three schools are all within ¼ mile of the Project, the HRA needs to analyze the Project’s potential hazardous air emissions that include TACs on all three schools and include those results in the Draft EIR along with any necessary mitigation measures. The HRA should specifically analyze DPM, Reactive Organic Gases (“ROGs”), Nitrogen Oxides, and dust impacts on the schools during Project construction. If mitigation measures are required, temporary HVAC systems with appropriate MERV-rated filters might be appropriate for significant air quality impacts.

If construction of the Project would cause lane and/or street closures, the air quality impact of longer Vehicle Miles Traveled (“VMT”) due to vehicles navigating around such closures and idling at congested street segments would need to also be analyzed in the Draft EIR.

3. HAZARDS AND HAZARDOUS MATERIALS.

As stated above, the RIS identifies the three schools being within ¼ mile of the Project. (RIS, p. IS-78.) It also notes that the Project could involve the use and transportation of hazardous materials, which their impact will be analyzed in the Draft EIR. (*Id.* p. IS-29.) As discussed above, the Draft EIR also needs to analyze the Project’s potential hazardous air emission impacts on the three schools in the HRA and provide appropriate mitigation measures for those potentially significant impacts.

Per Title 5 California Code of Regulations section 14010(d), a school cannot be sited within 1,500 feet of a railroad track easement unless a railroad safety study is conducted that demonstrates that students and staff will be adequately protected. Thus, an “unsafe” railroad in proximity to the District’s schools would be a significant hazard impact. This is especially important considering a potential derailment of a train that is elevated from 22 to 45 feet above ground. Given that the three schools are within 1,500 feet of the Project’s railroad tracks, the Draft EIR needs to include a railroad safety study at each school, and if the safety study reveals unsafe conditions, mitigation measures should be developed and proposed to remedy the unsafe conditions in order for the Project’s impact on the school be reduced to less than significant.

Per Title 5, California Code of Regulations section 14010(c), a school site must have the following setbacks to power line easements:

- 100 feet from 50-133 kV line;
- 150 feet from a 220-230 kV line; and
- 350 feet from a 500-550 kV line.

If any of the Project’s power lines exceed these voltages or any existing power line needs to be relocated, the resultant impact on Kelso needs to be evaluated because Kelso is within 350 feet of the Project. If a potentially significant electrical hazard impact is revealed by the study, appropriate mitigation measure(s) need to be identified and adopted.

Ms. Mindy Wilcox
October 12, 2020
Page 5

4. NOISE.

Noise monitoring sites used to analyze the ambient noise along the alignment should include the District's three schools and the Draft EIR needs to include analyses of noise impacts at each school. CDE's School Site Selection and Approval Guide ("CDE's Guide") states that background noise in a classroom should not exceed 30 decibels. (<https://www.cde.ca.gov/ls/fa/sf/schoolsiteguide.asp#Noise>.) CDE's Guide explains that the California Department of Transportation considers noise at 50 decibels in the vicinity of schools to be at the point at which it will take corrective action for noise generated by freeways. (*Ibid.*) The Streets and Highways Code also address traffic noise impacts in section 216(c):

"If the noise level produced from the freeway traffic, or the construction of the freeway, exceeds 55dBA, L10, or 52dBA, Leq., the department shall undertake a noise abatement program in any classroom, library, multipurpose room, or space used for pupil personnel services to reduce the freeway traffic noise level therein to 55dBA, L10, or 52dBA, Leq., or less, by, measures including, but not limited to, installing acoustical materials, eliminating windows, installing air-conditioning, or constructing sound baffle structures."

CDE's Guide moreover recognizes that the American Speech-Language-Hearing Association guidelines recommend that in classrooms, sounds dissipate in 0.4 seconds or less (and not reverberate) and that background noise not rise above 30 decibels. Further, the World Health Organization's Guidelines for Community Noise set maximum background classroom noise at 35 dBA. (<https://www.who.int/docstore/peh/noise/Comnoise-1.pdf>, p. xi.) Typical classroom attenuation is approximately 25 dBA. Therefore, the significant noise threshold at the schools' boundaries should be 60 dBA.

The Draft EIR should also consider the startle effect of the Project from train horns and other Project noises on the three schools. This is especially important given the noise and vibration sensitivity of special education students being taught at these three schools.

If the Draft EIR concludes that there would be a potentially significant impact on any of these schools, appropriate mitigation measures, such as sound walls, noise-attenuating windows, and other sound insulation should be utilized.

5. TRAFFIC.

The RIS states there will be a less than significant transportation impact from the Project, but transportation will still be studied in the Draft EIR. (RIS, p. IS-98.)

Although CEQA no longer considers vehicle delay as a significant transportation impact, analyses of traffic safety and educational impact by Project traffic are still necessary. The District is concerned with safety of, and delays to, drop-off and pick-up activities. The added delay can disrupt the educational day and could contribute to more frequent absences. Such disruptions would detract from the most effective educational program.

Further, drop-off (7:45 a.m. to 8:15 a.m.) and pick-up (2:30 p.m. to 3:20 p.m.) traffic at the three schools are very congested and will likely be made worse by Project construction. Additional delays and added traffic resulting from construction of the Project could exacerbate the congestion

7-6

7-7

Ms. Mindy Wilcox
October 12, 2020
Page 5

and potentially threaten the safety of students exiting and entering vehicles. The queue of vehicles creates temporary restrictions to sight lines that exacerbate the safety of the three schools. The Draft EIR should identify appropriate mitigation measures to reduce any discovered potential safety or educational impacts to less than significant.

As discussed above, it is anticipated that the construction of the Project would result in lane and street closures. Additionally, it is anticipated that certain pedestrian and bicycle thoroughfares would be closed during construction. The Draft EIR needs to analyze the impact of such closures on students walking or biking to and from the four schools and include appropriate mitigation measures to ensure that the students can safely navigate their ways to and from school.

6. UTILITIES.

The RIS states that there are several utilities within 15 feet of the alignment along Prairie Avenue and a 60-inch LADWP main pipe located on the east side of Prairie Avenue. (RIS, p. IS-102.) Per Title 5, California Code of Regulations section 14010(h), any high-pressure or hazardous material pipeline within 1,500 feet of a school site could constitute a potential hazard to students and staff and that a pipeline safety study is necessary. Since the three schools are within 1,500 feet of the Project, any relocation or addition of such pipelines needs to be analyzed and appropriately mitigated in the Draft EIR.

CONCLUSION.

The District desires that the Project's potentially significant and cumulative impacts to the students, parents, faculty, and staff of the District's schools are appropriately analyzed and mitigated while this important mass transit project becomes a reality. Accordingly, the District respectfully requests that the Draft EIR include those analyses and mitigation measures pertaining to the four schools as set forth herein.

Thank you for the opportunity to participate in this review process and for your consideration of the above. We look forward to continuing to work collaboratively with the City on this and many other projects to benefit the students and communities of Inglewood. If you have any questions or wish to meet, please contact me at Erika.Torres@inglewoodusd.com or call me at (323) 459-9291.

Sincerely,



Erika F. Torres, Ed.D., MSW
County Administrator
Inglewood Unified School District



7-8

7-9

10/13/2020

IS Comment (Culver CityBus) - inglewoodtransitconnector

IS Comment (Culver CityBus) CL 8

Zhang, Kaitlyn <Kaitlyn.Zhang@culvercity.org>

Mon 10/12/2020 12:49 PM

To:inglewoodtransitconnector <inglewoodtransitconnector@cityofinglewood.org>;

Cc:Chang, Diana <diana.chang@culvercity.org>;

Hello,

Please see below comment from Culver City Transportation Department (Culver CityBus) on the Revised Initial Study of the Inglewood Transit Connector Project.

Regarding Page IS-1 and IS-2, Refinements and modifications to the proposed station in the original NOP and IS, the project alignment was revised from an approximately 1.8-mile long alignment with 5 stations to an approximately 1.6-mile long alignment with 3 stations.

Culver CityBus Comment: Since the revised project scope is to only have up to three stations, the final stations should be designed to be as close as possible to the existing transit services in the area and the new Intermodal Transit Facility (ITF) in order to provide smooth transit connections.

Thank you.

[Kaitlyn Zhang](#)

Management Analyst | Transportation Planner
City of Culver City (Culver CityBus)
(310) 253 6503

The City of Culver City keeps a copy of all E-mails sent and received for a minimum of 2 years. All retained E-mails will be treated as a Public Record per the California Public Records Act, and may be subject to disclosure pursuant to the terms, and subject to the exemptions, of that Act.

8-1



523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2489 OFFICE
213 623 3909 FAX
laconservancy.org

October 13, 2020

Sent Electronically

Ms. Mindy Wilcox, AICP
Planning Manager
City of Inglewood Planning Division
One W. Manchester Boulevard, 4th Floor
Inglewood, CA 90301
Email: inglewoodtransitconnector@cityofinglewood.org

RE: Revised Notice of Preparation (NOP) and Initial Study (IS)
for the Inglewood Transit Connector Project

Dear Ms. Wilcox:

On behalf of the Los Angeles Conservancy, I am writing to comment on the Inglewood Transit Connector Project Notice of Preparation (NOP) and Initial Study (IS). The project proposes to build an automated people mover (APM) to transport pedestrians between **Metro’s Crenshaw Line station**, downtown Inglewood, the Forum, and SoFi Stadium. The proposed 1.6 mile long above ground APM will be constructed along Market Street, Manchester Boulevard, and Prairie Avenue with a total of three stations. Construction will occur within the public right of way.

- I. Nine historic resources within the Project Area will be adversely impacted by the proposed project

The Project Area for the Inglewood Transit Connector Project contains ten identified historic resources. Of the ten, nine are located between East Regent Street and Manchester Boulevard and the Forum located on Prairie Avenue. Between Regent and Manchester, eight historic resources are identified as eligible for listing in the California Register of Historical Resources and National Register of Historic Places. One property, the Fox Theater located at 115 N Market Street, is listed on the National Register.

As Historic Resources Group (HRG) stated in their Preliminary Historic Resources Investigation (Appendix B) of the Initial Study, the project will have significant and unavoidable indirect impacts to historic resources if constructed.



II. Alternatives to the proposed route must be explored

As stated above, the proposed project will have significant and unavoidable adverse impacts. The Conservancy urges the City of Inglewood to review and consider all available alternatives to this plan. Is it essential for the APM to travel along Market Street or is there an environmentally superior project route? Can the APM be designed in a manner that may reduce impacts on historic resources to less than significant levels? Such alternatives should be fully explored and seriously considered to avoid impacts to historic resources.

9-2

III. Conclusion

As proposed, Inglewood Transit Connector Project will have significant and unavoidable impacts to historic resources. The current APM route, which moves south along Market Street and East along Manchester Boulevard contains a collection of historic resources that date from 1920 to 1950. To avoid impacts to these resources, the Conservancy strongly encourages the City of Inglewood to explore alternative routes as well as APM designs whereby the impacts may be reduced to less than significant levels.

9-3

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,



Adrian Scott Fine
Director of Advocacy



CL 10



THOMAS SAFRAN & ASSOCIATES

October 12, 2020

Ms. Mindy Wilcox, AICP
Planning Manager
City of Inglewood
One W. Manchester Boulevard
Inglewood, California 90301

mwilcox@cityofinglewood.org

Re: Inglewood Transit Connector Project Initial Study

Dear Ms. Wilcox:

I am writing on behalf of Thomas Safran & Associates (TSA), a local stakeholder in the Inglewood Community, to provide comment on the Revised Initial Study the City of Inglewood (“City”) recently released for the Inglewood Transit Connector project (ITC). TSA owns four properties on Market Street in close proximity to the proposed northern terminus of the ITC. In the collaborative spirit in which TSA and the City have partnered to bring over three hundred residential units to this area, TSA is looking forward to working with the City to help ensure that the ITC matches the long-planned vibrancy for the neighborhood surrounding the Downtown Inglewood Metro station.

Given the proximity of TSA’s properties to the alignment, especially the northern terminus, TSA would like to review more detailed information about the project, including plans, renderings, and other available project concepts and anticipated specifications. Evaluating plans for the proposed northern terminus of the ITC, its design (including anticipated finishing materials) and connection to the Downtown Inglewood Metro station would equip TSA to offer meaningful feedback that will benefit the ITC, TSA’s neighboring residential projects, and other nearby structures. TSA would prefer to review such materials prior to the commencement of EIR analysis. However, if such materials are not available, TSA is willing to work with the City on their development.

As the City proceeds with environmental analysis, TSA requests that the EIR treat TSA’s properties as sensitive receptors for all noise, air quality, and GHG analysis. The Revised Initial study acknowledges the property identified by the City as D-3 is currently under construction with residential uses; as such, it will be evaluated as a sensitive receptor. TSA requests that the EIR also treat properties located at 139 North Market Street and 158 North Market Street as sensitive receptors. Though these lots are currently vacant, TSA purchased them from the City with the understanding that they would be developed with residential units. Similarly, TSA has been analyzing renovating the Fox Theater as a residential structure. As TSA continues working towards the goal of establishing residential uses at these locations, it is important that the EIR simultaneously analyze that eventuality.

In addition to analyzing these properties as sensitive receptors, TSA has identified issues specific to these properties that we want to bring to the City’s attention prior to commencement of EIR analysis. Light, glare, shade, and shadow could potentially create aesthetic impacts to residential units located at D-3, 139 North Market Street, and 158 North Market Street. Further, project design analyzed by the

10-1

10-2

10-3



THOMAS SAFRAN & ASSOCIATES

EIR should account for posts and other equipment at street level to ensure that development of residential or mixed-use projects at 139 North Market Street and 158 North Market Street is not precluded by the ITC. The EIR should memorialize that the ITC will specifically be designed to allow for these projects' development. TSA would appreciate analysis of engineering solutions the EIR could include to mitigate and/or avoid these potential impacts.

10-4

The Revised Initial Study acknowledges that the Fox Theater is listed on the National Register of Historic Places but suggests that impacts to the Fox Theater as a historic resource would be limited since the ITC would not be taller than the structure. As the building is characterized by its architectural significance, it is important that the EIR analyze how the ITC may impact the Fox Theater, a historic resource, pursuant to Public Resources Code § 21084.1.

10-5

Finally, TSA is requesting more information regarding the anticipated Overlay Zone described in the Revised Initial Study. TSA believes that, consistent with state policy prioritizing transit-oriented development, any overlay zone implemented associated with the ITC should include zoning refinements to expedite the entitlement process for mixed-use and residential development. TSA is willing to work with the City to help ensure that the anticipated Overlay Zone is consistent with the City's intentions.

10-6

TSA is excited to be a part of the emerging Inglewood. Major changes in Inglewood are underway, with the renovation of the Forum, the opening of Sofi Stadium, and the Basketball and Entertainment Center. The City continues to implement its vision for the future of Inglewood, connecting these exciting venues to the County's mass transit system. TSA considers itself a proud stakeholder in the reimagining of Inglewood, developing much needed housing in the heart of the City which will allow the community to live and thrive around these new facilities. We look forward to our continued, enduring partnership with the City.

10-7

Sincerely,

Jordan Pynes
President
Thomas Safran & Associates

CL 11



October 8th 2020

Ms. Mindy Wilcox, AICP
Planning Manager
City of Inglewood
One W. Manchester Blvd, 4th Floor
Inglewood, CA 90301

RE: Inglewood Transit Connector Revised Notice of Preparation

Dear Ms. Wilcox,

BYD has reviewed the *Revised Notice of Preparation for an Environmental Impact Report* dated September 10th 2020 and we appreciate the opportunity to do so at this critical juncture for the project.

Please note that BYD does not have comments on the *Revised Notice of Preparation*. We and our partners remain in full support of this truly transformative project for improved mobility in the City of Inglewood and Los Angeles County. We look forward to the positive social and economic benefits transportation systems like these can bring to the communities in which we serve.

Sincerely,

A handwritten signature in black ink, appearing to read 'Patrick Duan', is written above the typed name.

Patrick Duan
Senior Vice President of Operations
BYD Transit Solutions

11-1

CL 12

Mindy Wilcox, AICP
Planning Manager
City of Inglewood
Planning Division
One W. Manchester Boulevard, 4th Floor
Inglewood, Ca. 90301

Comments regarding: Revised notice of preparation for the Inglewood Transit Connector Project

In the original Notice of Preparation (NOP), four potential sites were identified for the support facilities. In the revised NOP, it appears that one of the sites has been selected as the Maintenance Support Facility (MSF). This selected site is currently occupied by a VONS supermarket, Planet Fitness, and gas station. Based on the information provided in the NOP, the businesses within this commercial plaza would be demolished.

12-1

In general, I am supportive of the transit project, but strongly opposed to an eminent domain acquisition and demolition of the VONS supermarket. The VONS at this location serves thousands of Inglewood residents in the surrounding geographical area. It is the only one of two supermarkets located between the western border and eastern border in the city of Inglewood, that is South of Florence Blvd. and North of Century Blvd.

12-2

This VONS serves a large swath of Inglewood residents and is largely walkable from a good portion of the area. This VONS also serves many senior citizens who live in the area such as myself, a resident of the area for the last 20 years. In my opinion, the loss of VONS would be a huge impact as it would be a sacrifice that would become a permanent inconvenience to the surrounding community.

The Automated People Mover would minimize automotive traffic through the city between certain hours of the weekday and weekends. However, the loss of the VONS supermarket that is available to residents 18 hours a day and 7 days a week is not an acceptable tradeoff.

12-3

Personally, I do not think there has been sufficient outreach to let the community know what will be impacted in this proposal. There was one outreach meeting sponsored by Trifiletti Consulting in late 2019, but no other information in the last 9 months prior to the revised NOP.

12-4

I would request that the consultants look again at the potential site that sits near the north west corner of Prairie and Century as an alternate MSF location. It was identified as a gas station and auto shop in the initial study. It seems to me that this location would have less of an impact to the residents of the city that reside in or near the project area.

12-5

Also, the description of the potential station location at Prairie Ave/Pincay Drive does not indicate if there would be a street closure involved going west on Kelso street, or going east on Pincay street. If so, this would also be a huge inconvenience for the area residents. I hope to see more information and have input regarding the ongoing plans for this intersection and the transit project as a whole.

12-6

Regards,
William Harris, Inglewood Resident



ATTACHMENT 9

**Summary Matrix of Comments and Topics for Revised NOP and Revised
Initial Study**

Summary of Matrix Topics

Comment Number	Agency/Entity/Individual	Name of Commenter	Date	Address	City/State/Zip	Email/Website	EIR Topics	Comment Letter Bracket
State Agencies								
1	State of California, Native American Heritage Commission	Andrew Green, Cultural Resources Analyst	9/14/20	1550 Harbor Blvd., Suite 100	Sacramento, CA 95691	andrew.green@nahc.ca.gov	Tribal	1-1, 1-2
2	State of California, Department of Transportation	Miya Edmonson, IGR/CEQA Branch Chief	10/12/20	100 S. Main St., MS 16	Los Angeles, CA 90012	https://dot.ca.gov/caltrans-near-me/district-7	Not An Environmental Comment Transportation	2-1, 2-2, 2-3, 2-4, 2-5, 2-6
Regional Agencies								
3	Los Angeles County Transportation Agency	Shine Ling, Manager	10/12/20	One Gateway Plaza	Los Angeles, CA 90012	lings@metro.net	Not An Environmental Comment Transportation Air Quality, Noise, Public Service, Cumulative	3-1 3-2, 3-3, 3-4, 3-5 3-5
4	South Coast Air Quality Management District	Lijin Sun, Program Supervisor CEQA IGR Planning, Rule Development & Area Sources	10/12/20	21865 Copley Dr.	Diamond Bar, CA 91765	lsun@aqmd.gov	Air Quality, GHG	4-1, 4-2, 4-3, 4-4, 4-5, 4-6, 4-7
5	Los Angeles County Public Works	Toan Duong, Civil Engineer	10/12/20	One W. Manchester Blvd., 4th Floor	Inglewood, CA 90301	tduong@dpw.lacounty.gov	Not An Environmental Comment Hydrology and Water Quality Utilities and Service Systems	5-1, 5-5 5-2, 5-3, 5-4
6	Los Angeles County Fire Department	Ronald M. Durbin, Chief	10/15/20	1320 North Eastern Ave.	Los Angeles, CA 90063	www.fire.lacounty.gov	Not An Environmental Comment Public Services Land Use, Utilities and Services Biology Hazardous Waste	6-1 6-2 6-3 6-4 6-5
Local Agencies								
7	Inglewood Unified School District	Erika F. Torrex, Ed.D., MSW, County Administrator	10/12/20	401 S. Inglewood Ave.	Inglewood, CA 90301	erika.torress@inglewoodsun.com	Not An Environmental Comment Aesthetics Air Quality Hazards and Hazardous Materials Noise Transportation Utilities and Services	7-1, 7-9 7-2, 7-3 7-2, 7-4 7-2, 7-5 7-2, 7-6 7-2, 7-7 7-2, 7-5, 7-8
8	City of Culver City (Culver CityBus)	Kaitlyn Zhang, Management Analyst/Transportation Planner	10/12/20	4343 Duquesne Ave.	Culver City, CA 90232	kaitlyn@zhang@culvercity.org	Transportation	8-1
9	Los Angeles Conservancy	Adrian Scott Fine, Director of Advocacy	10/13/20	523 West Sixth Street	Los Angeles, CA 90014	afine@laconservancy.org	Historical Resources	9-1, 9-2, 9-3
Interested Parties and Individuals								
10	Thomas Safran & Associates	Jordan Pynes, President	10/12/20	11811 San Vicente Blvd.	Los Angeles, CA 90049	http://www.tsahousing.com	Not An Environmental Comment Air Quality Noise GHG Aesthetics Land Use Cultural	9-1,9-7 9-2 9-2 9-2 9-3 9-4, 9-6 9-5
10	Build Your Dreams Transit Solutions	Patrick Duan	10/9/20	1800 S. Figueroa St.	Los Angeles, CA 90015	https://en.byd.com	Not An Environmental Comment	10-1
11	--	William Harris	10/12/20	--	--	--	Not An Environmental Comment Land Use Transportation	11-1, 11-4 11-2, 11-3, 11-5 11-6