Memorandum

To: CHAIR AND COMMISSIONERS **CTC Meeting**: August 16-17, 2023

From: TANISHA TAYLOR, Executive Director

Reference Number: 2.2c.(4), Action

Prepared By: Cherry Zamora
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Subject: Approval of Project for Future Funding Consideration – Final Environmental Impact Report and Addendum for the Inglewood Transit Connector Project, Resolution #E-23-124

Recommendation:

Staff recommends the California Transportation Commission (Commission), as a Responsible Agency, accept the Final Environmental Impact Report (FEIR) and Addendum analyzing the Inglewood Transit Connector Project (Project) in the City of Inglewood in Los Angeles County and approve the Project for future funding consideration.

Issue:

The City of Inglewood (City) is the California Environmental Quality Act Lead Agency for the Project. The Project will construct a 1.6-mile, three-station, fully elevated, electrically powered automated transit system that will connect passengers directly to the Metro K Line's Downtown Inglewood station and complete the last-mile gap between Metro and the City's new major employment and activity centers including The Forum, SoFi Stadium, the Intuit Dome, and adjacent development. The Project includes a maintenance and storage facility, power distribution system substations, roadway improvements, pick-up and drop-off areas, and parking facilities. The Project is primarily located in the public right-of-way along Market Street, Manchester Boulevard, and Prairie Avenue in the City of Inglewood in Los Angeles County.

For all projects that are anticipated to be funded through a program under the purview of the Commission, full compliance with the California Environmental Quality Act is required. The Commission will not allocate funds to projects for design, right-of-way, or construction until the environmental document is complete, and the Commission has approved the environmentally cleared project for future funding consideration.

Background:

On April 14, 2022, the City certified the FEIR. On April 11, 2023, the City approved the Addendum for the Project to address refinements to the location of the maintenance and storage facility, new parking, reduction of the guideway height along Market Street, reduction

of the roadway width along Prairie Avenue, reduction of the elevated pedestrian walkway widths at each station, and construction of a new Southern California Edison Substation.

The City found that the Project would not have a significant impact on the environment after mitigation. Impacts that require mitigation measures to be reduced to less than significant levels relate to air quality, biological resources, cultural resources, tribal cultural resources, geology, utilities, aesthetics, energy, hazards and hazardous materials, noise, and transportation. Mitigation measures include the following: nesting bird surveys; inadvertent discovery procedures for cultural and tribal cultural resources; project design to minimize impacts to the setting of historical resources; locating construction structures to avoid geological hazards; preparation of fault investigation; project adjustments to avoid fault hazards; paleontological monitoring; unanticipated discovery measures for paleontological resources; tribal cultural resources monitoring and inadvertent discovery procedures implementation; utility coordination; minimizing the impact of temporary lighting during evening and nighttime hours through timing, placement, and shielding; tree replacement; lighting design; signage design; use of Final Tier 4 emission standards for applicable construction equipment; use of Best Available Control Technology for construction equipment; use of energy efficient equipment and design features; implementation of a building demolition plan; hazardous materials contingency plan, soil management plan, health and safety plan, and utility relocation work practices; construction noise and vibration reduction measures; maintenance of transit access; traffic control; and parking and staging management.

On July 24, 2023, the City confirmed that the FEIR and Addendum remain valid and that there are no new identified impacts requiring mitigation. The City also confirmed that the Project set forth in the FEIR and Addendum is consistent with the Project scope of work programmed by the Commission.

The Project is estimated to cost $2,051,400,000 and is funded through Project Approval & Environmental Document and Right-of-Way phases with Federal Transit Administration – Section 5309 Capital Investment Grant ($1,211,000,000), RAISE Grant ($15,000,000), Community Project Funding (formerly Federal Earmark) ($5,000,000), Transportation, Housing and Urban Development, and Related Agencies Bill Funding ($5,000,000); Grant from U.S. Department of Housing and Urban Development ($3,000,000); Transit and Intercity Rail Capital Program – Cycle 4 ($95,200,000); Transit and Intercity Rail Capital Program – Cycle 6 ($407,000,000); Community Project Funding (formerly State Earmark) ($9,000,000); State General Funds ($2,000,000); Metro Measure R Funding ($139,800,000); contributed capital from the City ($2,500,000); and additional non-Capital Investment Grant funding sources ($156,900,000) funds.

Construction is estimated to begin in Fiscal Year 2023-24.

Attachments:

- Attachment A: Resolution E-23-124
- Attachment B: Findings of Fact
- Attachment C: Notice of Determination
- Attachment D: Project Location Map

CALIFORNIA TRANSPORTATION COMMISSION
Resolution for Future Funding Consideration

7 – Los Angeles County
Resolution E-23-124

1.1 WHEREAS, the City of Inglewood (City) has completed a Final Environmental Impact Report (FEIR) and Addendum to the FEIR (Addendum) for the Inglewood Transit Connector Project (Project); and

1.2 WHEREAS, the City has certified the FEIR and approved the Addendum pursuant to the California Environmental Quality Act (CEQA) and the CEQA Guidelines; and

1.3 WHEREAS, the Project is primarily located in the public right-of-way along Market Street, Manchester Boulevard, and Prairie Avenue in the City of Inglewood in Los Angeles County; and

1.4 WHEREAS, the Project will construct a 1.6-mile, three-station, fully elevated, electrically powered automated transit system that will connect passengers directly to the Metro K Line's Downtown Inglewood station and complete the last-mile gap between Metro and the City's new major employment and activity centers including The Forum, SoFi Stadium, the Intuit Dome, and adjacent development. The Project includes a maintenance and storage facility, power distribution system substations, roadway improvements, pick-up and drop-off areas, and parking facilities; and

1.5 WHEREAS, on April 14, 2022, the City certified the FEIR; and

1.6 WHEREAS, on April 11, 2023, the City approved the Addendum; and

1.7 WHEREAS, the City determined that the Project's impacts on air quality, biological resources, cultural resources, tribal cultural resources, geology, utilities, aesthetics, energy, hazards and hazardous materials, noise, and transportation would be mitigated to less than significant levels; and

1.8 WHEREAS, on July 24, 2023, the City confirmed that the Project set forth in the FEIR with Addendum is consistent with the Project scope of work programmed by the Commission; and

1.9 WHEREAS, the Commission, as a Responsible Agency, has considered the information contained in the FEIR and Addendum; and

2.1 NOW, THEREFORE, BE IT RESOLVED that the Commission does hereby accept the FEIR and Addendum and approves the above-referenced Project for future funding consideration.

CEQA FINDINGS OF FACT FOR THE INGLEWOOD TRANSIT CONNECTOR PROJECT MODIFICATIONS

I. BACKGROUND

On April 14, 2022, the City of Inglewood (City) City Council approved the Inglewood Transit Connector project (Project). The City determined that the Project is exempt from the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.) pursuant to Public Resources Code section 21080(b)(12) and CEQA Guidelines[1] section 15275(b) because the Project is a "facility extension" of the existing Metro K light-rail line, which is less than four miles in length and is required for the transfer of passengers to or from an exclusive public mass transit guideway. The City filed a Notice of Exemption (NOE) for the Project on April 14, 2022.

Although the Project is statutorily exempt from CEQA, the City voluntarily prepared a full environmental impact report (EIR) for the Project (State Clearinghouse No. 2018071034). On April 14, 2022, the City Council certified a Final EIR, adopted CEQA Findings of Fact and approved a Mitigation Monitoring and Reporting Program (MMRP) for the Project. The City filed a Notice of Determination (NOD) for the Project on April 14, 2022.

Following the City's approval of the Project, as part of the City's procurement process for the selection of a developer to implement the Project, alternative design concepts were discussed with bidders. This process resulted in defining potential refinements to the Project for further consideration by the City. The City then completed a separate and independent value engineering process for the Project; this work effort resulted in the City proposing to refine the Project design in a manner that would generate significant cost savings, reduce the number of property acquisitions required for the Project, and shorten the construction schedule. These proposed changes include moving the location of the Maintenance and Storage Facility (MSF) to the same site as the Market Street/Florence Avenue Station, which would allow the Vons store and other businesses at 500 E. Manchester to remain in their current location. In addition, the guideway along Market Street is proposed to be modified by lowering the height of the guideway, and shifting it to the east. Minor modifications to Project Design Feature (PDF) CUL-1 and its corresponding requirements in the the ITC Design Guidelines are proposed based on the proposed modifications to the guideway. These changes, and other proposed modifications to the Project/Locally Preferred Alternative (LPA) (the "Modified Project") are described more fully in the first Addendum to the Final Environmental Impact Report (Addendum) (Meridian 2023) adopted by the City concurrently with these Findings.

[1] The CEQA Guidelines are codified in the California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387.

II. FINDINGS OF FACT

The California State Legislature has determined that certain activities are exempt from CEQA. (See e.g., Pub. Resources Code, § 21080(b).) One such statutory exemption is for "[f]acility extensions not to exceed four miles in length which are required for the transfer of passengers for or to exclusive public mass transit guideway or busway public transit systems." (Pub. Resources Code, § 21080(b)(12); CEQA Guidelines, § 15275(b).) The City previously determined that the Project meets this definition.

The proposed modifications to the Project do not alter the conclusion that the Project is statutorily exempt from CEQA. The Project remains a "facility extension" of the existing Metro K light-rail line in that the Modified Project continues to provide a 1.6-mile light rail transit facility, including the Market Street/Florence Avenue Station with a passenger walkway connection to the existing Metro K Line Downtown Inglewood Station. At 1.6 miles in length, the Modified Project does not "exceed four miles in length." The Modified Project is "required for the transfer of passengers" to close the last-mile gap between the Metro K line and existing and new major housing, employment, and activity centers in the City of Inglewood. Finally, the Modified Project will transfer passengers "from or to [an] exclusive public mass transit guideway" by transferring passengers from and to the Metro K Line Downtown Inglewood Station. The Modified Project is, therefore, exempt from CEQA under that statutory exemption for facility extensions as set forth in Public Resources Code section 21080(b)(12) and CEQA Guidelines section 15275(b).

Although the Modified Project is statutorily exempt from CEQA, the City voluntarily prepared an Addendum to the certified Final EIR. Section 15164 of the CEQA Guidelines provides that an Addendum to a previously certified EIR shall be prepared if some changes or additions to the EIR are necessary but none of the conditions calling for the preparation of a subsequent EIR has occurred. Here, as set forth in the Addendum, the Modified Project would not result in any new significant impacts not discussed in the Final EIR or any substantially more severe significant effects than identified in the Final EIR.

The City Council has reviewed and considered the Addendum with the Final EIR. Based on the whole of the record, including the Addendum and Final EIR, the City Council hereby finds:

1. The Project, as modified, remains statutorily exempt from CEQA under Public Resources Code section 21080(b)(12) "[f]acility extensions not to exceed four miles in length which are required for the transfer of passengers for or to exclusive public mass transit guideway or busway public transit systems."

2. The Addendum and the Final EIR, taken together, reflect the City's independent judgment.

3. These Findings incorporate by reference in their entirety the Addendum prepared for the Modified Project, the certified Final EIR, and the CEQA Findings of Fact adopted in support of the City's April 14, 2022 approval of the Project.

4. No substantial changes with respect to the circumstances under which the Project have occurred since the Final EIR was certified which require major revisions of the Final EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

5. No new information of substantial importance which was not known, and could not have been known with the exercise of reasonable diligence at the time the EIR was certified for the Project, has been discovered which would require major revisions of the Final EIR.

6. There is no substantial evidence in the record as a whole that the Modified Project will result in any new significant impacts or any substantially more severe significant environmental impacts than previously identified in the certified Final EIR.

   *With respect to **Impact CUL-1** evaluated in the Final EIR, the Modified Project – including the revisions to PDF CUL-1 – would not result in a new or substantially more severe significant impact to historic resources as defined in CEQA Guidelines, section 16064.5. As discussed in the first Addendum to the Final EIR (Meridian 2023) and the Historical Resources Technical Report Addendum (HRG 2023), the Modified Project would not result in a substantial adverse change in the significance of historical resources. The proposed revisions to Section 2.2 of the ITC Design Standards and Guidelines include performance-based standards that must be incorporated into the final Project design to ensure minimal impacts to the setting of historic resources, little or no visual obstruction of the resource's street-facing facades, and the retention of important views from which to understand the building's overall scale, massing, composition, and design. As discussed below, consistent with the conclusions of the Final EIR, under the Modified Project, impacts to historical built environment would continue to be **less than significant**. Therefore, no new or substantially more severe impact with respect to Impact CUL-1 has been identified.*

   <u>260 N. Locust Street (Holy Faith Episcopal Church)</u>

   The proposed relocation of the MSF from the Vons site to the Market Street/Florence Avenue Station would locate the MSF to across the street from the Holy Faith Episcopal Church. As discussed in the first Addendum to the Final EIR and the Historical Resources Technical Report Addendum, this change would

not physically alter the Holy Faith Episcopal Church property in any way. The buildings would remain in their original locations and would retain all of their significant character-defining features. Setting features import to the Holy Faith Church property are largely located within the boundaries of the church property. These include the lawns, planted areas and pedestrian paths located within the interstitial spaces between and in front of the buildings. The immediate surroundings outside Church property boundaries—a densely developed urban area containing a wide range of building types and uses dating from various periods of development—are less important. This is particularly true of the existing commercial block to be redeveloped by the approved Project which was developed over 50 years after the Church was constructed. The church property and the commercial block are not spatially related, with the majority of the shopping center buildings oriented to a surface parking lot to the west.

Under the Modified Project, the new construction would be separated from the Holy Faith Episcopal Church property by the width of a residential street (Locust Street). With nearly 100 feet of separation, the proposed modifications to the Market Street/Florence Station site – including the addition of the SCE Substation and MSF – would not alter important setting features located on the Church property or interfere with any important visual or spatial relationships between the property and its immediate surroundings. For these reasons, the addition of the MSF, PDS Substation, and SCE Substation, each of which would be a substantial distance away the Church property, would not substantially alter the Church's setting. The important setting features located within the boundaries of the church property would remain unchanged by the Modified Project. The areas to be redeveloped by the Modified Project have been substantially altered over time and have no important spatial or visual relationships with the church property.

Further, pursuant to Project Design Feature NOISE-2 (Construction Vibration Reduction Plan), a detailed Construction Vibration Reduction Plan that includes performance standards for historic resources would be prepared and implemented. This Plan requires that in the event the regulatory vibration level is triggered, construction activities would be halted. The source of vibration is required to be identified and the vibration level reduced to below FTA's threshold of significance for vibration levels such that no damage to historic buildings would occur. Additionally, pursuant to Project Design Feature NOISE-1 (Construction Noise Control Plan), a Construction Noise Control Plan will be developed that includes noise reduction measures that will reduce construction noise levels to below FTA's General Assessment Construction Noise Criteria.

Further, as explained in the Addendum, operational noise generated by the proposed SCE Substation at the MSF site would not be discernable.

Because the Modified Project would not physically alter the Holy Faith Episcopal Church property and would not alter its surroundings such that the historic significance of the resource can no longer be conveyed, it would not result in a substantial adverse change in the significance of the historical resource. All of the aspects of integrity would remain, and therefore the historical resource would retain integrity overall. After construction of the Proposed Project the Holy Faith Episcopal Church property would continue to convey its historic significance. Therefore, under the Modified Project, impacts to the Holy Faith Episcopal Church property would ***remain less than significant****.*

<u>158-170 N. Market Street (former United Bank of California)</u>

Two differences between the approved Project evaluated in the Final EIR and the Modified Project would occur in the near vicinity of the former United Bank of California building: the shifting of the guideway alignment to the east within the Market Street public right-of-way, and the lowering of the guideway height along Market Street as measured from the existing grade. Because the former United Bank of California building is situated on the east side of Market Street, shifting the guideway to the east along Market Street would move the guideway approximately 5 feet closer to this historical resource than under the approved Project. At this point along the alignment, the bottom of the guideway would be elevated approximately 40 feet above the roadway. The former United Bank of California building measures approximately 23 feet in height. Thus, the guideway for the Modified Project would clear the top of the building by approximately 17 feet.

Like the approved Project, the Modified Project would not physically alter the former United Bank of California building in any way. The building would remain in its original location and would retain all of its significant character-defining features. Under the Modified Project, the horizontal distance between the ATS guideway and the building's façade would be sufficient to maintain a substantial portion of the existing open sidewalk and street area that partly defines the historical resource's setting. Additionally, the guideway would be vertically positioned higher than the building and thus would not obscure important physical features of the primary façade when viewed from the west side of Market Street. The building's overall scale, massing, composition, and design would remain readily discernable. As illustrated in Figure 3.4-2 (Former United

Bank of California) of the Addendum, the Modified Project would achieve a clear line of sight of the historical resource's primary façade as viewed by a pedestrian standing on the sidewalk across the street from the resource.

The alteration to the ATC guideway's location and height would not substantially interfere with the visual and spatial relationships between the building and its immediate surroundings as compared with the approved Project. The building would retain all other aspects of integrity, and therefore the historical resource would retain integrity overall. Thus, with implementation of the Modified Project, the former United Bank of California building would continue to convey its historic significance. As such, impacts to this historical resource as a result of the Modified Project ***would remain less than significant****.*

<u>115 N. Market Street (former Fox Theater)</u>

Two of the differences between the Approved Project and the Modified Project would occur in the near vicinity of the former Fox Theater building: the shifting of the guideway alignment to the east within the Market Street public right-of-way, and the lowering of the guideway height along Market Street as measured from the existing grade. Because the former Fox Theater building is situated on the west side of Market Street, the shifting of the guideway to the east along Market Street moves then guideway approximately 16 feet further from this historical resource than previously analyzed in the Final EIR for the approved Project. The main volume of the Fox Theater building measures approximately 38 feet in height, with its monumental sign pylon rising to a height of approximately 70 feet. Thus, the guideway would clear the top of the building's main volume by approximately 5 feet; however, similar to the approved Project, it would not vertically clear the sign pylon.

As with the approved Project, the Modified Project would not physically alter the former Fox Theater building in any way. The building would remain in its original location and would retain all of its significant character-defining features. Similar to the approved Project, under the Modified Project, the horizontal distance between the ATS guideway and the building's façade would be sufficient to maintain a substantial portion of the existing open sidewalk and street area that defines the historical resource's setting. While the guideway would not be positioned higher than the theater building's 70-foot monumental sign pylon, the guideway would be sufficiently elevated from the existing grade to ensure that it would not obscure important physical features of the primary façade when

viewed from the east side of Market Street. The building's overall scale, massing, composition, and design would remain readily discernable. As illustrated in Figure 3.4-3 (Fox Theater) of the Addendum, the Modified Project would achieve a clear line of sight of the historical resource's primary façade—including its monumental sign pylon—as viewed by a pedestrian standing on the sidewalk across the street from the resource.

The proposed alteration to the location and height of the ATC guideway structure would not substantially interfere with the visual and spatial relationships between the building and its immediate surroundings. Additionally, the guideway will continue to be carried by single columns positioned in the center of Market Street, although, as required by the original and revised Design Guidelines, no column will be located directly in front of or immediately adjacent to the Fox Theater. The building would retain all other aspects of integrity, and therefore the historical resource would retain integrity overall. Thus, after implementation of the Proposed Project, the former Fox Theater building would continue to convey its historic significance. As such, impacts to this historical resource as a result of the Modified Project would ***remain less than significant****.*

<u>100 N. Market Street/307 E. Queen Street (former Bank of Inglewood)</u>

Near the vicinity of the former Bank of Inglewood building, the Modified Project would shift the guideway alignment to the east within the Market Street public right-of-way and lower the guideway height to approximately 42 feet above the roadway. Because the former Bank of Inglewood building is on the east side of Market Street, the proposed shift in the guideway would move the guideway approximately 5 feet closer to this historical resource. The former Bank of Inglewood building is approximately 33 feet in height. The guideway at this location would be approximately 43 feet above the roadway, meaning that the guideway would clear the top of the building by approximately 9 feet.

The Modified Project would not physically alter the former Bank of Inglewood building in any way. The building would remain in its original location and would retain all of its significant character-defining features. Under the Modified Project, the horizontal distance between the guideway and the building's façade would be sufficient to maintain a substantial portion of the existing open sidewalk and street area that defines the historical resource's setting. Additionally, the guideway would be vertically positioned higher than the building and would thus not obscure important physical features of the primary

façade when viewed from the west side of Market Street. The building's overall scale, massing, composition, and design would remain readily discernable. As shown in Figure 3.4.4 (Former Bank of Inglewood) in the Addendum, the Modified Project would maintain a clear line of sight of the historical resource's primary façade as viewed by a pedestrian standing on the sidewalk across the street from the resource. The building would retain all other aspects of integrity, and therefore the historical resource would retain integrity overall. Thus, under the Modified Project, the former Bank of Inglewood building would continue to convey its historic significance. As such, impacts to this historical resource as a result of the Modified Project would ***remain less than significant****.*

<u>129-139 S. Market Street (former J.C. Penny)</u>

Two of the differences between the Approved Project and the Proposed Project would occur in the near vicinity of the former J.C. Penney building: the shifting of the guideway alignment to the east within the Market Street public right-of-way, and the lowering of the guideway height along Market Street as measured from the existing grade. Because the former J.C. Penney building is situated on the west side of Market Street, shifting the guideway to the east along Market would move the guideway further from this historical resource than under the approved Project. Under the Modified Project, the guideway would be approximately 44 feet from the building façade at its closest point, or approximately 16 feet further than analyzed in the Final EIR. At this point along the alignment, the bottom of the guideway would be elevated approximately 43 feet above the roadway. The former J.C. Penney building measures approximately 30 feet in height. Thus, the guideway would clear the top of the building by approximately 13 feet. The Modified Project would not physically alter the former J.C. Penney building in any way. The building would remain in its original location and would retain all of its significant character-defining features.

Under the Modified Project, the horizontal distance between the guideway and the building's façade would be sufficient to maintain a substantial portion of the existing open sidewalk and street area that defines the historical resource's setting. Additionally, the guideway would be vertically positioned higher than the building and thus would not obscure important physical features of the primary façade when viewed from the east side of Market Street. The building's overall scale, massing, composition, and design would remain readily discernable. As illustrated in Figure 3.4-5 (Former JC Penney and Professional Building), the Modified Project would achieve a clear line of sight of the historical

resource's primary façade as viewed by a pedestrian standing on the sidewalk across the street from the resource.

The alteration to the location and height of the guideway within the vicinity of this historical resource would not substantially interfere with the visual and spatial relationships between the building and its immediate surroundings as compared with the approved Project. The building would retain all other aspects of integrity, and therefore the historical resource would retain integrity overall. Thus, with the Modified Project, the former J.C. Penney building would continue to convey its historic significance. As such, impacts to this historical resource as a result of the Modified Project would ***remain less than significant****.*

<u>149-155 S. Market Street/231-239 E. Manchester Boulevard (Professional Building)</u>

Two of the differences between the approved Project and the Modified Project would occur in the near vicinity of the Professional Building: the shifting of the guideway alignment to the east within the Market Street public right-of-way, and the lowering of the guideway height along Market Street as measured from the existing grade. Because the Professional Building is situated on the west side of Market Street, shifting of the guideway to the east along Market Street would move the guideway approximately 14 feet further from this historical resource than previously analyzed in the Final EIR for the approved Project. At this point along the alignment, the bottom of the guideway would be elevated approximately 43 feet above the roadway. The Professional Building measures approximately 32 feet in height. Thus, the guideway would clear the top of the building by approximately 11 feet.

Like the approved Project, the Modified Project would not physically alter the Professional Building in any way. The building would remain in its original location and would retain all of its significant character-defining features. Under the Modified Project, the horizontal distance between the ATS guideway and the building's façade would be sufficient to maintain a substantial portion of the existing open sidewalk and street area that defines the historical resource's setting. Additionally, the guideway would be vertically positioned higher than the building and thus would not obscure important physical features of the primary façade when viewed from the east side of Market Street. The building's overall scale, massing, composition, and design would remain readily discernable. As illustrated in Figure 3.4-5 (Former JC Penney and Professional

Building) of the Addendum, the Modified Project would achieve a clear line of sight of the historical resource's primary façade as viewed by a pedestrian standing on the sidewalk across the street from the resource.

The alteration of the ATS guideway's location and height in the vicinity of the Professional Building would not substantially interfere with the visual and spatial relationships between the building and its immediate surroundings as compared with the approved Project. The building would retain all other aspects of integrity, and therefore the historical resource would retain integrity overall. Thus, under the Modified Project, the Professional Building would continue to convey its historic significance. As such, impacts to this historical resource as a result of the Modified Project would ***remain less than significant****.*

III. RECORD OF PROCEEDINGS

The record upon which all findings and determinations related to the City's action on the modified Project are those items listed in Public Resources Code section 21167.6(e), and include, but are not limited to:

- The NOE, NOD, and all other public notices issued by the City in connection with the Modified Project;
- The Addendum, the Final EIR, and all documents referenced in or relied upon in the Addendum or Final EIR;
- The revised MMRP for the Project;
- The revised Design Standards and Guidelines for the Project;
- All information including written evidence and testimony provided by City staff and consultants to the City Council relating to the Modified Project and the Addendum;
- All staff reports prepared by City staff or consultants relating to the Modified Project;
- All resolutions and findings adopted by the City Council with respect to the Modified Project, and all documents cited are referred to therein.

The documents constituting the record of proceedings for the City's action on the Modified Project are available for review by responsible agencies and interested members of the public

during normal business hours at the City Inglewood Economic and Community Development Department, One West Manchester Boulevard, Fourth Floor, Inglewood, CA 90301. The custodian of these documents is the Economic and Community Development Director. The City may also be contacted by e-mail at inglewoodtransitconnector@cityofinglewood.org.

CEQA FINDINGS OF FACT FOR THE INGLEWOOD TRANSIT CONNECTOR

In determining to approve the Inglewood Transit Connector project ("Project"), the City of Inglewood ("City") City Council makes and adopts the following findings of fact and decisions regarding mitigation measures and alternatives based on substantial evidence in the whole record of this proceeding and under the California Environmental Quality Act ("CEQA") (Pub. Resources Code, § 21000 et seq.), particularly Public Resources Code sections 21081 and 21081.5, the State Guidelines for Implementation of CEQA ("CEQA Guidelines") (California Code of Regulations, tit. 14, § 15000 et seq.), particularly sections 15091 through 15093, and City of Inglewood Municipal Code, Chapter 12, Article 28.

This document is organized as follows:

Section I provides a description of the Project, the environmental review process for the Project, the approval actions to be taken, and the location of records;

Section II identifies the impacts found not to be significant that do not require mitigation;

Section III identifies potentially significant impacts that can be avoided or reduced to less-than- significant levels through mitigation and describes the disposition of the mitigation measures;

Section IV evaluates the different Project alternatives and the economic, legal, social, technological, and other considerations that support approval of the Project and the rejection of the alternatives, or elements thereof, analyzed.

The Mitigation Monitoring and Reporting Program ("MMRP") for the mitigation measures that have been proposed for adoption are adopted with these findings. The MMRP is required by CEQA section 21081.6, subdivision (a)(1), and CEQA Guidelines sections 15091, subdivision (d), and 15097. The MMRP provides a table setting forth each mitigation measure listed in the Final Environmental Impact Report for the Project ("Final EIR") that is required to reduce or avoid a significant adverse impact. The MMRP also includes the Project Design Features incorporated into the Project and identified in the EIR to avoid or lessen impacts of the Project. Exhibit C also specifies the agency responsible for implementation of each measure. All of the City's specific obligations are also described. The full text of each mitigation measure summarized or cited in these findings is set forth in the MMRP.

Under CEQA, the City Council has discretion to revise or reject proposed mitigation measures. These findings reflect the mitigation measures as set forth in the EIR. If and to the extent the City Council directs City staff to revise the mitigation measures listed in these findings or in the MMRP, City staff will revise these documents as necessary to reflect the City Council's direction.

These findings are based upon substantial evidence in the entire record before the City Council. In these findings the references to certain pages or sections of the Recirculated Draft or Final EIR, which together constitute the EIR, are for ease of reference and are not intended to provide an exhaustive list of the evidence relied upon for these findings. A full explanation of the substantial evidence supporting these findings can be found in the EIR, and these findings hereby incorporate by reference the discussion and analyses in those documents supporting the EIR's determinations regarding the Project's impacts and mitigation measures designed to address those impacts. References to the Recirculated Draft EIR or to the EIR are intended as a general reference to information that may be found in either or both the Recirculated Draft EIR or Final EIR.

I. APPROVAL OF PROJECT

A. Description of the Project

The Project is an Automated Transit System (ATS), which would include an approximately 1.6-mile-long, elevated, guideway located within current and to-be-acquired public right-of-way along Market Street, Manchester Boulevard, and Prairie Avenue. Three stations are proposed adjacent to the guideway on privately owned land that is proposed to be acquired as part of the Project. The elevated guideway will contain dual lanes to allow trains to travel continuously in each direction. Several trains would likely be operating at the same time, depending on ridership demand.

As part of the City's collaboration and partnership with the Los Angeles County Metropolitan Transportation Authority (Metro), the Project is an extension of the Metro regional rail system to the City's activity centers, closing the critical first/last mile transit gap in Inglewood, increasing passenger service along the Metro system by facilitating a seamless transfer of passengers between the ITC and the Metro K Line.

The ATS technology may be a self-propelled technology, including rubber-tire ATS systems, monorails, large steel-wheel ATS systems, also known as automated light rail transit (ALRT), or a cable-propelled ATS system. The system will be fully automated (i.e., driverless) to operate at the headways to meet the projected peak ridership needs.

The ATS trains will operate in a pinched-loop mode on dual tracks along the alignment, wherein trains follow each other and switch back at the end-of-line stations to make the return journey on the other track. As planned, the trains can be operated in multiple different configurations, ranging from a one-car train to multiple-car length trains with a maximum train length of approximately 200 feet. Depending on the technology (self-propelled or cable propelled), ridership demands, which will be time of day and event day dependent, multiple trains of up to the maximum train length can be operated at varying headways

for self-propelled systems, as close as 1.5 minutes apart, to provide the necessary peak and reserve capacity.

The Project includes three stations::

a) The *Market Street/Florence Avenue* station generally located between Market Street and Locust Street providing connections to the Metro K Line and Downtown Inglewood;

b) The *Prairie Avenue/Manchester Boulevard* station located on the southwest corner of the intersection of Prairie Avenue and Manchester Boulevard providing service to the Forum, Hollywood Park including SoFi Stadium, and existing and future local businesses and residences.

c) The *Prairie Avenue/Hardy Street* station located on the northwest corner of the intersection of Prairie Avenue and Hardy Street providing service to the Hollywood Park, including SoFi Stadium, the Inglewood Basketball and Entertainment Center including Intuit Dome, and other existing and future local businesses and residences.

These station locations were chosen to be near major employment, housing, and retail centers, including the Forum, SoFi Stadium, and other employment, housing, and retail commercial uses in the Hollywood Park Specific Plan (HPSP), the IBEC, and Downtown Inglewood, which the City is seeking to enhance and activate.

Existing roadways and infrastructure along the transit alignment will require reconfiguration to accommodate the new elevated transit guideway structures and stations. In addition to surface improvements, utility infrastructure located under roadways may need to be relocated to accommodate the guideway columns, footings, and other components. The roadway reconfigurations proposed along Market Street, Manchester Boulevard, and Prairie Avenue are necessary to assure that the existing roadway travel capacity is not reduced to accommodate the Project.

The Project includes a Maintenance and Storage Facility (MSF) to provide regular and preventive maintenance for the ATS trains, vehicle storage, and an operations control center located on the eastern half of the block bound by Manchester Boulevard, Hillcrest Boulevard, Nutwood Street and Spruce Avenue. An existing commercial building containing a Vons grocery store, a fitness center, and a bank branch, is located on the southern portion of this site. A gas station operated by Vons is located on the northeast portion of this site. Demolition of the existing commercial building and gas station is proposed as part of the Project. A new Vons replacement store is proposed on the corner of Manchester Boulevard and Hillcrest Boulevard.

The MSF will be designed in accordance with the ITC Design Standards and Guidelines (Design Guidelines), which address the massing, façade, materials, colors, roof, and lighting for this facility, how the MSF will engage with the passenger and vehicular circulation around it, and sustainability features. The Project

also includes two power distribution system (PDS) substations. These PDS substations will provide the necessary power for the 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, where the Southern California Edison (SCE) service connection will be provided. The second PDS substation will be located on the Prairie Avenue/Hardy Street or Prairie Avenue/Manchester Boulevard station site.

Additional public parking will be provided as part of the Project at three locations that will be used as construction staging areas. After construction, these sites will be improved as public parking lots:

- Approximately 650 parking spaces will be provided in a surface parking lot at the Market Street/Florence Avenue Station along with pick-up and drop-off areas on Locust Avenue and Regent Street.
- Approximately 50 parking spaces would be provided in a surface parking lot at 150 S. Market Street.
- Approximately 80 parking spaces and a shuttle bus pick-up and drop-off area are would be provided at the Prairie Avenue/Hardy Street Station. This lot would be used for public parking, TNCs and shuttle bus pick-up and drop-off operations during events.

These parking areas will provide public parking needed in the City to support use of the Project, businesses, and the City's efforts to help revitalize the historic retail areas along Market Street. The Project is designed and intended to extend the transit service provided by the Metro K Line to the major event venues and existing and planned residential and commercial uses in the City, and these parking facilities are proposed to support transit use. On non-event days, the parking is designed to allow the City's residents to become transit riders and use the Metro Rail system, providing local convenient parking adjacent to the ITC and Metro K Line. On event days, the City recognizes that many visitors may still drive to the City in search of convenient parking with proximity to commercial uses and access to a direct transportation connection to the City's major event venues. To help with overall traffic congestion and improve circulation on local streets, and to help reduce visitors parking in residential areas, the Project includes parking in close proximity to the Project stations and downtown Market Street area. These parking areas will also provide replacement parking for public parking on streets that may be removed as part of the Project.

B. Project Objectives

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

The City's goals and objectives for the Project are as follows:

- Provide a direct and convenient extension of the Metro regional transit system for local residents and the region to access the City's new major housing, employment, commercial, and activity centers;
- Close the "last mile gap" to the regional transit system by providing passengers with the ability to transfer to or from destinations and the Metro K Line.
- Provide sufficient transit connection capacity between the Metro regional transit system and the City's major activity centers with enhanced travel time certainty and sufficient capacity to meet peak ridership demands to encourage transit as a travel mode choice;
- Maintain existing roadway capacity to the extent feasible;
- Reduce the City's traffic congestion and alleviate growing demand on the existing roadway network on both major arterials and residential streets for both nonevent and event days;
- Encourage intermodal transportation systems by providing convenient, reliable time-certain transit;
- Increase transit mode split, reduce vehicle trips, and reduce per-capita vehicle miles traveled to the City's major activity centers, with corresponding improvements in air quality, public health, and reductions in greenhouse gas emissions from transportation sources in accordance with the City's goals, the SCAG 2020-2045 RTP/SCS, and State policies with respect to climate change and land use.
- Support the ongoing economic revitalization and growth opportunities for transit-oriented development (TOD) within the Downtown TOD Plan area, including commercial and residential uses, including through the creation of public parking facilities;
- Encourage redevelopment and investment within the City in areas served by the Project;
- Provide safe, reliable, and convenient access to businesses in the City so that they are accessible to their workforce and customers;
- Connect the Inglewood community and citizens to jobs, education, services, and destinations within the City and in the region by providing transit within safe and accessible walking distances; and
- Support regional efforts to become more efficient, economically strong, equitable, and sustainable.

C. Environmental Review

1. Preparation of the Final EIR

The EIR for the Inglewood Transit Connector (SCH No. 2018071034) was prepared, noticed, published, circulated, reviewed, and completed in full compliance with CEQA, the CEQA Guidelines (, and the City of Inglewood Municipal Code, as follows:

a) In 2017, the City partnered with Metro to address the City's critical mobility issues by analyzing viable transit connection options from the Metro K Line to the LASED, which includes SoFi Stadium. With the

City's input, Metro conducted a study[1] to explore how best to extend the Metro Rail system via a high-capacity transit connection to the LASED.

b) In early 2018, the City also initiated stakeholder outreach to understand the City's need for a comprehensive long-range mobility plan, potential project goals and objectives, potential project benefits and impacts, and stakeholder concerns.

c) In July 2018, pursuant to the requirements of CEQA, the City as the Lead Agency prepared a Notice of Preparation (Original NOP) and an Initial Study (Original IS) (SCH 2018071034).

d) The Original NOP and IS were circulated and comments were received from the public and agencies following a 30-day comment period that ended on August 15, 2018.

e) A scoping meeting was held on July 26, 2018, from 6 PM to 8 PM at the Inglewood Senior Citizens Center, 111 N. Locust Street, Inglewood, CA 90301. The City provided the opportunity for comments to be submitted at the scoping meeting.

f) As a result of the comments received and refinements and modifications to the Project identified in the Original NOP and Original IS after circulation of the July 2018 Notice of Preparation, a Revised NOP and IS were circulated for public review and comment from September 10, 2020 to October 12, 2020. The City submitted both the Original and Revised NOPs and Initial Studies to the Governor's Office of Planning and Research (OPR); applicable trustee or responsible federal, State, regional, and local agencies identified for the Project, including adjacent cities and counties; the County of Los Angeles; relevant Native American tribes; and all interested parties requesting such notice to allow for comment on the IS during the 30-day comment period. In addition, copies of the Original and Revised NOPs and ISs were made available for review at Inglewood City Hall and the Inglewood Public library, as well as on the City's website, to give the public the opportunity to comment during the respective 30-day comment periods.

g) The City prepared and released a Draft EIR for public review in December 2020. Based on additional feedback received during the Draft EIR circulation period the City continued further collaboration with key stakeholders on the design of the Project. City also conducted additional technical analysis and due diligence on potential utility conflicts, property impacts, and potential impacts to historical resources, and refined the project to reduce the project footprint where feasible.

h) As a result of this ongoing consultation process, the City further refined the Project and revised the Draft EIR to evaluate these changes to the Project. The City prepared and released a Recirculated Draft EIR for public review in November 2021. The Revised Project as evaluated in the RDEIR remains an approximately 1.6-mile long alignment with 3 stations beginning at the intersection of Market Street and Florence Avenue, continuing along Manchester Avenue and Prairie Avenue, and ending at the intersection of Prairie Avenue and Hardy Street.

1 Los Angeles County Metropolitan Transportation Authority, *City of Champions/Inglewood (NFL) Focused Analysis of Transit Connection* (August 2017).

i) A Notice of Completion (NOC) and copies of the Draft EIR were filed with SCH on November 12, 2021. An official 45-day public review period for the Draft EIR was established by SCH, ending on December 27, 2021. A Notice of Availability (NOA) for the Draft EIR was published on November 11, 2021 and sent to appropriate public agencies, including SCH and Los Angeles County Clerk, and all entities who requested to be notified about the Project and/or EIR. The Recirculated Draft EIR was also published on the City's website.

j) On January 25, 2022, the City held a hearing at which it determined that the Project is exempt from CEQA pursuant to CEQA section 21080, subdivision (b)(12) and CEQA Guidelines section 15275, subdivision (b) as a "[f]acility [extension] not to exceed four miles in length which [is] required for the transfer of passengers from or to exclusive public mass transit guideway or busway public transit services."

k) On February 17, 2022, the City released the Final EIR for the Project. The Final EIR included (i) comments on the Recirculated Draft EIR submitted during the comment period, (ii) responses to those comments, (iii) staff-initiated revisions to the text of the Recirculated Draft EIR, together with an explanation of why those changes were made, and (iv) a draft of the MMRP. The City sent notice to those submitting comments and to other interested agencies and individuals that the Final EIR had been released, stating that the Final EIR had been posted and was available for review on the City's web site, and that the Final EIR included responses to comments received on the Recirculated Draft EIR.

l) On March 3, 2022, following a public hearing, the City Planning Commission adopted a resolution recommending that the City Council certify the Final EIR, adopt these findings, and approve the MMRP.

m) The City made documents available to the public in a readily accessible electronic format, including the Recirculated Draft EIR, all documents submitted to or relied on in the preparation of the Recirculated Draft EIR, comments and the Final EIR, as required by Public Resources Code section 21168.6.8(g). Documents were posted in a timely manner on the City's Economic and Community Development Department EIR web page at https://www.cityofinglewood.org/1016/Environmental-Documents and www.inglewoodtransitconnector.com.

2. Recirculation

Under section 15088.5 of the CEQA Guidelines, recirculation of an EIR is required when "significant new information" is added to the EIR after public notice is given of the availability of the Draft EIR for public review but prior to certification of the Final EIR. The term "information" can include changes in the project or environmental setting, as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project'sproponents

have declined to implement. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:

1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

3) A feasible project alternative or mitigation measure considerably different from others previouslyanalyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.

4) The DEIR was so fundamentally and basically inadequate and conclusory in nature thatmeaningful public review and comment were precluded.

(CEQA Guidelines, § 15088.5, subd. (a).)

Recirculation is not required where the new information added in the Final EIR merely clarifies or amplifies or makes insignificant modifications in an adequate Draft EIR. The above standard is “notintend[ed] to promote endless rounds of revision and recirculation of EIR’s.” (*Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1132 (*Laurel Heights*).) “Recirculation was intended to be an exception, rather than the general rule.” (*Ibid*.)

The City recognizes that minor changes have been made to the Project and additional evidence has been developed after publication of the Recirculated Draft EIR. The refinements to the project are described in Chapter 2 of the Final EIR. As described in the Final EIR, these refinements would result either in no changes to the impact conclusions or in a reduction in the severity of the impact presented in the Recirculated Draft EIR. In addition, minor refinements that have occurred after the publication of the Final EIR will not result in new or substantially more severe significant impacts.

Finally, the Final EIR includes supplemental data and information that was developed after publication of the Recirculated Draft EIR to further support the information presented in the Recirculated Draft EIR. None of this supplemental information affects the conclusions or results in substantive changes to the information presented in the Recirculated Draft EIR or to the significance of impacts as disclosed in the Recirculated Draft EIR.

CEQA case law emphasizes that “‘[t]he CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal.’” (*Kings County Farm Bureau v. City of*

Hanford (1990) 221 Cal.App.3d 692, 736–737 (*Kings County*); see also *River Valley Preservation Project v. Metropolitan Transit Development Bd.* (1995) 37 Cal.App.4th 154, 168, fn. 11.) "'CEQA compels an interactive process of assessment of environmental impacts and responsive project modification which must be genuine. It must be open to the public, premised upon a full and meaningful disclosure of the scope, purposes, and effect of a consistently described project, with flexibility to respond to unforeseen insights that emerge from the process.' [Citation.] In short, a project must be open for public discussion and subject to agency modification during the CEQA process." (*Concerned Citizens of Costa Mesa, Inc. v. 33rd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 936.)

Similarly, additional studies included in a Final EIR that result in minor modifications or additions to analysis concerning significant impacts disclosed in a Draft EIR does not constitute "significant new information" requiring recirculation of an EIR. (See *Mount Shasta Bioregional Ecology Center v. County of Siskiyou* (2012) 210 Cal.App.4th 184, 221 [incorporation of technical studies in a Final EIR disclosing additional locations affected by a significant noise impact identified in the Draft EIR did not require recirculation].) Here, the changes made to the Project and the additional evidence relied on in the Final EIR are the kind of information and revisions that the case law recognizes as legitimate and proper and does not trigger the need to recirculate the Recirculated Draft EIR.

The City Council finds that none of the changes and revisions in the Final EIR substantially affect the analyses or conclusions presented in the Recirculated Draft EIR, and do not constitute significant new information; therefore, recirculation of the Recirculated Draft EIR for additional public comments is not required.

D. Approval Actions

Implementation of the Project may require, but may not be limited to, the following actions by the City of Inglewood:

- Certification of the Final EIR for the Inglewood Transit Connector Project and adoption of the Mitigation Monitoring and Reporting Plan, CEQA Findings of Fact, and, if necessary, a Statement of Overriding Considerations;
- Approval of the proposed General Plan Amendment, consisting of changes to the City General Plan Land Use Element, Circulation Element, and Safety Element;
- Approval of an amendment to Chapter 12 (Planning and Zoning) of the Inglewood Municipal Code to:
    - Add the Transportation Corridor Overlay (TCO) Zone; and

  - Amend the Medical Enterprise Overlay Zone to exclude land uses associated with the Project.

- Approval of amendments to the Forum Development Agreement to reflect the acquisition of frontage along Prairie (including loss of Forum parking);
- Approval of a Special Use Permit required for demolition of a gas station, Design Review for the new supermarket, and any other discretionary approval required for a new supermarket at 500 and 510 East Manchester Boulevard;
- Approval of amendments and clarifications to the Hollywood Park Specific Plan and associated Development Agreement;
- Preparation of a Project-specific Stormwater Management Plan or Standard Urban Stormwater Mitigation Plan for approval;
- Approvals of lot line adjustment(s), parcel map(s), and tract map(s) as needed;
- Approval of agreements and/or resolutions necessary to acquire the property necessary for construction and operation of the Project, in fee simple or through easements, licenses, air rights, leases, or other means of access, including through eminent domain;
- Approval of the ITC Design Standards and Guidelines;
- Approval of a contract or contracts for the design, finance, construction, and operation of the Project;
- Approvals for federal, State, or local financing plans or grants.

In addition to the above, ministerial approvals may be required as follows:

- Grading permits, building permits, haul route approval, and other permits issued by the Department of Building and Safety for the Project and any associated Department of Public Works permits (including encroachment permits) for infrastructure improvements;
- Tree removal permits; and
- Noise permit for Construction and Building Hours extension.
- Other federal, State, or local approvals, permits, or actions that may be deemed necessary for the Project including, but not limited to, the following:
  - California Public Utilities Commission;
  - Los Angeles County Fire Department.

E. Contents and Location of Record

The record upon which all findings and determinations related to the Project consists of those items listed in Public Resources Code section 21167.6 subdivision (e), which are incorporated by reference and made part of the record supporting these findings:

- The City of Inglewood General Plan and all Elements thereto, as amended from time to time through the date of approval of the Project;
- City of Inglewood Municipal Code;
- The NOP and all other public notices issued by the City in conjunction with the Project;
- The EIR and all documents referenced in or relied upon by the EIR;
- The MMRP for the Project;
- All findings and resolutions adopted by the City in connection with the Project, and all documents cited or referred to therein;
- All information including written evidence and testimony provided by City staff and consultants to the City Council relating to the EIR, the Project, and the alternatives set forth in the EIR or these CEQA findings;
- All records of decision, staff reports, memoranda, maps, exhibits, letters, synopses of meetings, andother documents approved, reviewed, relied upon, or prepared by any City commissions, boards, officials, consultants, or staff relating to the Project;
- All information provided by the public, including written correspondence received by City staff during the public comment period of the Recirculated Draft EIR.
- All testimony presented to the Planning Commission or City Council;
- All information presented at workshops or hearings held by the City for the Project.

The documents constituting the record of proceedings are available for review by responsible agencies and interested members of the public during normal business hours at the City of Inglewood Economic and Community Development Department, One West Manchester Boulevard, Fourth Floor, Inglewood, CA 90301. The custodian of these documents is the Economic and Community Development Director. The City Council has relied on all of the documents listed above in reaching its decision on the Project, even if not every document was formally presented to the Council. Without exception, any documents set forth above not found in the Project files fall into one of two categories. In the first category, many of the documents reflect prior planning or legislative decisions of which the City Council was familiar with when approving the Project. (See *Dominey v. Dept. of Personnel Administration* (1988) 205 Cal.App.3d 729, 738, fn. 6; *City of Santa Cruz v. Local Agency Formation Com.* (1978) 76 Cal.App.3d 381, 391–392.) In the second category, documents that influenced the expert advice provided to City staff or consultants, who then provided advice to the City Council as final decision makers, form part of the underlying factual basis for the City Council's decisions relating to approval of the Project and properly constitute part of the administrative record. (See CEQA, § 21167.6, subd. (e)(10); *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 153, 155; *Browning-Ferris Industries v. City Council* (1986) 181 Cal.App.3d 852, 866.) The City Council notes, however, that the record of proceedings does not include

internal "working draft" documents that have not been shared with the public; rather, such documents reflect the practical reality that a given document often undergoes multiple drafts before it is released to the public, relied upon by the City, or presented to decisionmakers. Just as the first draft of a legal brief or of a judicial opinion is not relevant to a document in its final, filed form, the internal working draft of City staff or consultants is not relevant to the City Council's decision. Such documents are therefore not part of the record of proceedings.

The public hearing transcript, a copy of all letters regarding the Draft EIR received during the public review period, the administrative record, and background documentation for the Final EIR, as well as additional materials concerning approval of the Project and adoption of these findings are contained in the Project files. Project files are available by contacting Mindy Wilcox, Planning Manager, at the Inglewood City Hall, Economic & Community Development Department Planning Division, One West Manchester Boulevard, Fourth Floor, Inglewood, California 90301. The City may also be contacted by e-mail at inglewoodtransitconnector@cityofinglewood.org. All files have been available to the City Council and the public for review in considering these findings and whether to approve the Project.

F. Findings Required Under CEQA

1. Findings

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environment impacts that would otherwise occur. Mitigation measures or alternatives are not required, however, where such changes are infeasible or where the responsibility for implementing the mitigation measure or alternative resides with another agency. (Pub. Resources Code, § 21081, subd. (a)(2); CEQA Guidelines, § 15091, subds. (a), (b).)

Public Resources Code section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." CEQA Guidelines section 15364 includes another factor: "legal" considerations. (See also *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 565–566 (*Goleta II*).)

The concept of "feasibility" also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417.) "[F]easibility" under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors." (*Ibid.*; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715; see also *California Native Plant Society v. City of Santa Cruz* (2009) 177

Cal.App.4th 957, 1001 [after weighing "'economic, environmental, social, and technological factors'" an agency may conclude that a mitigation measure or alternative is "'impracticable or undesirable from a policy standpoint'" and reject it as "infeasible" on that ground].)

With respect to a project for which significant impacts are not avoided or substantially lessened, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's "benefits" rendered "acceptable" its "unavoidable adverse environmental effects." (CEQA Guidelines, §§ 15093, 15043, subd. (b); see also Pub. Resources Code, § 21081, subd. (b).)

In seeking to effectuate the substantive policy of CEQA to substantially lessen or avoid significant environmental effects to the extent feasible, an agency, in adopting findings, need not necessarily address the feasibility of both mitigation measures and environmentally superior alternatives when contemplating approval of a Project with significant impacts. Where a significant impact can be mitigated to an "acceptable" level solely by the adoption of feasible mitigation measures, the agency, in drafting its findings, has no obligation to consider the feasibility of any environmentally superior alternative that could also substantially lessen or avoid that same impact — even if the alternative would render the impact less severe than would the Project as mitigated. (*Laurel Hills Homeowners Association v. City Council* (1978) 83 Cal.App.3d 515, 521; see also *Kings County*, *supra*, 221 Cal.App.3d at pp. 730-731; and *Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal.3d 376, 400–403.)

In these findings, the City first addresses the extent to which each significant environmental effect can be substantially lessened or avoided through the adoption of feasible mitigation measures. Only after determining that, even with the adoption of all feasible mitigation measures, an effect is significant and unavoidable does the City address the extent to which alternatives described in the EIR are (i) environmentally superior with respect to that effect and (ii) "feasible" within the meaning of CEQA.

In cases in which a project's significant effects cannot be mitigated or avoided, an agency, after adopting proper findings, may nevertheless approve the project if it first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the "benefits of the project outweigh the significant effects on the environment." (Pub. Resources Code, § 21081, subd. (b); see also CEQA Guidelines, §§ 15093, 15043, subd. (b).) In the statement of overriding considerations found at the end of these findings, the City identifies the specific economic, legal, social, and other considerations that, in its judgment, outweigh the significant environmental effects that the Project will cause.

The California Supreme Court has stated that "[t]he wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced." (*Goleta II*, *supra*, 52 Cal.3d at p. 576.)

The City Council's findings in support of its approval of the Project are set forth below for each of the significant environmental effects of and alternatives to the Project identified in the EIR pursuant to section 21080 of CEQA and section 15091 of the CEQA Guidelines. These findings provide the written analysis and conclusions of the City Council regarding the environmental impacts of the Project and the mitigation measures included as part of the EIR and adopted by the City Council as part of the Project. To avoid duplication and redundancy, and because the City Council agrees with, and hereby adopts, the conclusions in the EIR, these findings will not repeat the analysis and conclusions in the EIR, but instead incorporates them by reference in these findings and relies upon them as substantial evidence supporting these findings.

In making these findings, the City Council has considered the opinions of staff and experts, other agencies, and members of the public. The City Council finds that the determination of significance thresholds is a judgment decision within the discretion of the City Council; the significance thresholds used in the EIR are supported by substantial evidence in the record, including the expert opinion of the EIR preparers and City staff; and the significance thresholds used in the EIR provide reasonable and appropriate means of assessing the significance of the adverse environmental effects of the Project. Thus, although, as a legal matter, the City Council is not bound by the significance determinations in the EIR (see Pub. Resources Code, § 21082.2, subd. (e)), the City Council finds them persuasive and hereby adopts them as its own.

As set forth below, the City Council adopts and incorporates all of the mitigation measures set forth in the EIR and the attached MMRP to substantially lessen or avoid the potentially significant and significant impacts of the Project.

2. Findings About Significant Environmental Impacts and Mitigation Measures

The following sections of these findings – Sections II, III and IV – set forth the City's findings about the EIR's determinations regarding significant environmental impacts and the mitigation measures proposed to address them. These findings provide the written analysis and conclusions of the City regarding the environmental impacts of the Project and the mitigation measures included as part of the EIR and adopted by the City as part of the Project. To avoid duplication and redundancy, and because the City agrees with,

and hereby adopts, the conclusions in the EIR, these findings will not repeat the analysis and conclusions in the EIR, but instead incorporates them by reference in these findings and relies upon them as substantial evidence supporting these findings.

These findings do not attempt to describe the full analysis of each environmental impact contained in the EIR. Instead, a full explanation of these environmental findings and conclusions can be found in the EIR, and these findings hereby incorporate by reference the discussion and analysis in the EIR supporting the EIR's determination regarding the Project's impacts and mitigation measures designed to address those impacts. In making these findings, the City Council ratifies, adopts, and incorporates in these findings, the determinations and conclusions of the EIR relating to environmental impacts and mitigation measures, except to the extent any such determinations and conclusions are specifically and expressly modified by these findings.

As set forth below, the City Council adopts and incorporates all of the mitigation measures within its authority and jurisdiction as lead agency, as set forth in the EIR and presented in the MMRP, in order to substantially lessen or avoid the potentially significant and significant impacts of the Project. The MMRP will remain available for public review during the compliance period. In adopting mitigation measures from the EIR, the City Council intends to adopt each of the mitigation measures proposed in the EIR for the Project for adoption by the City. The City Council also intends that the MMRP should include each and every mitigation measure included in the EIR, including those assigned to responsible agencies. Accordingly, in the event a mitigation measure recommended in the EIR has inadvertently been omitted in these findings or the MMRP, any such mitigation measure is hereby adopted and/or incorporated in the findings below by reference.

In addition, mitigation measures are listed in different locations in these findings, in the MMRP, and in the EIR. The City has made every effort to ensure that the text of each mitigation measure is consistent wherever that text appears. To the extent the text differs for the same mitigation measure from one location to another, such differences are inadvertent. In those instances, the text of the mitigation measure as it appears in the MMRP shall control, unless in context it is clear that the text in the MMRP does not reflect the City's determination with respect to the mitigation measure to be adopted; in such instances, the most stringent version of the mitigation measure shall apply, regardless of whether that most stringent version appears in the findings, in the MMRP, or in the EIR.

The impact numbers and mitigation measure numbers used in these findings reflect the information contained in the EIR. In Sections II, III and IV below, the same statutory findings are made for a category of environmental impacts and mitigation measures. Rather than repeat the identical finding several times

to address each and every significant effect and mitigation measure, the initial finding obviates the need for such repetition because in no instance is the City Council rejecting the conclusions of the EIR or the mitigation measures recommended in the EIR for the Project.

II. IMPACTS FOUND TO HAVE NO IMPACT OR BE LESS THAN SIGNIFICANT AND THUS REQUIRING NO MITIGATION

Under CEQA, no mitigation measures are required for impacts that are less than significant (Pub. Resources Code, section §; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091). Based on substantial evidence in the entire record of this proceeding, the City Council finds that implementation of the Project will not result in any significant impacts in the following areas and that these impact areas, therefore, do not require mitigation. As stated above, these findings do not repeat the analysis and conclusions in the EIR, but instead incorporates them by reference in these findings and rely upon them as substantial evidence supporting these findings.

A. Aesthetics

Impact AES-1a: Construction and operation of the Project could substantially degrade the existing visual character or quality of public views of the site and its surroundings or could conflict with the City's zoning and regulations governing scenic quality. (Refer to pages 4.1-19 through 4.1-68 of the Recirculated Draft EIR.)

Impact AES-1b: Construction and operation of the Project could be inconsistent with applicable zoning and planning regulations governing scenic quality. (Refer to pages 4.1-68 through 4.1-75 of the Recirculated Draft EIR.)

Impact AES-2: Construction and operation of the Project could create a new source of substantial light or glare, which could adversely affect day or nighttime views in the area. (Refer to pages 4.1-76 through 4.1-82 of the Recirculated Draft EIR.)

B. Biological Resources

Impact BIO-2: Construction and operation of the Project could conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. (Refer to pages 4.3-52 through 4.9-62 of the Recirculated Draft EIR.)

C. Cultural Resources

Impact CUL-1: Construction and operation of the Project could cause a substantial adverse change in the significance of a historic resource pursuant to Section 15064.5. (Refer to pages 4.4-45 through 4.4-60 of the Recirculated Draft EIR.)

D. Energy Resources

Impact E-1: Construction and operation of the Project could result in wasteful, inefficient, or unnecessary consumption of energy resources. (Refer to pages 4.5-21 through 4.5-35 of the Recirculated Draft EIR.)

Impact E-2: Construction and operation of the Project could conflict with or obstruct a State or local plan for renewable energy or energy efficiency. (Refer to pages 4.5-35 through 4.5-38 of the Recirculated Draft EIR.)

E. Greenhouse Gas Emissions

Impact GHG-1: Construction and operation of the Project could generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. (Refer to pages 4.7-42 through 4.7-49 of the Recirculated Draft EIR.)

Impact GHG-2: Construction and operation of the Project could conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. (Refer to pages 4.7-49 through 4.7-57 of the Recirculated Draft EIR.)

F. Hazards and Hazardous Materials

Impact HAZ-1: Construction and operation of the Project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (Refer to pages 4.8-31 through 4.8-38 of the Recirculated Draft EIR.)

Impact HAZ-2: Construction and operation of the Project could emit hazardous emissions or involve the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. (Refer to pages 4.8-38 through 4.8-43 of the Recirculated Draft EIR.)

Impact HAZ-3: Construction and operation of the Project could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (Refer to pages 4.8-44 through 4.8-47 of the Recirculated Draft EIR.)

G. Land Use and Planning

Impact LU-1: Construction and operation of the Project could physically divide an established community. (Refer to pages 4.8-49 through 4.9-47 of the Recirculated Draft EIR.)

Impact LU-2: Construction and operation of the Project could cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. (Refer to pages 4.9-47 through 4.9-77 of the Recirculated Draft EIR.)

H. Noise

Impact NOI-1: Construction and operation of the Project could result in a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or

applicable standards of other agencies. (Refer to pages 4.10-65 through 4.10-109 of the Recirculated Draft EIR.)

Impact NOI-2: Construction and operation of the Project could result in exposure of persons to or generate excessive groundborne vibration or groundborne noise levels. (Refer to pages 4.10-109 through 4.10-116 of the Recirculated Draft EIR.)

I. Population, Employment, and Housing

Impact POP-1: Construction of the Project could induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). (Refer to pages 4.11-15 through 4.11-23 of the Recirculated Draft EIR.)

J. Transportation

Impact T-1: Construction and operation of the Project could conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. (Refer to pages 4.12-36 through 4.11-52 of the Recirculated Draft EIR.)

Impact T-2: Construction and operation of the Project could conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). (Refer to pages 4.12-52 through 4.11-66 of the Recirculated Draft EIR.)

Impact T-3: Construction and operation of the Project could substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (Refer to pages 4.12-66 through 4.11-67 of the Recirculated Draft EIR.)

Impact T-4: Construction and operation of the Project could conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. (Refer to pages 4.12-68 through 4.11-69 of the Recirculated Draft EIR.)

III. SIGNIFICANT OR POTENTIALLY SIGNIFICANT IMPACTS MITIGATED TO A LESS THAN SIGNIFICANT LEVEL

The following significant and potentially significant environmental impacts of the Project, including cumulative impacts, are being mitigated to a less than significant level and are set out below. Pursuant to section 21081, subdivision (a)(1) of CEQA and section 15091, subdivision (a)(1) of the CEQA Guidelines, as to each such impact, the City Council, based on the evidence in the record before it, finds that changes or alterations incorporated into the Project by means of conditions or otherwise mitigate, avoid, or substantially lessen to a level of insignificance these significant or potentially significant environmental impacts of the Project. The basis for the finding for each identified impact is set forth below.

A. Air Quality

Impact AQ-1: **Construction of the Project could conflict with or obstruct implementation of the applicable air quality plan as the Project would exceed the NOx SCAQMD threshold during construction. (Refer to pages 4.2-47 through 4.2-60 of the Recirculated Draft EIR.)**

MM AQ-1: PDF AQ-1, Construction Air Quality Program, shall be implemented during construction of the ITC Project.

Basis for Finding: Mitigation Measure MM AQ-1 requires the implementation of PDF AQ-1 from the Project's Construction Commitment Program (CCP) to reduce air quality emissions during construction. PDF AQ-1 requires the Project to use equipment that meets the U.S. Environmental Protection Agency (USEPA)'s Final Tier 4 emissions standards for off-road diesel-powered construction equipment with 50 horsepower (hp) or greater, for all phases of construction activity. With implementation of PDF AQ-1, this impact would be **less than significant**.

Finding: Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Recirculated Draft EIR. Impacts will be less than significant.

Impact AQ-2: **Construction of the Project could result in a cumulatively considerable net increase of NOx emissions. (Refer to pages 4.2-61 through 4.2-70 of the Recirculated Draft EIR.)**

MM AQ-1: PDF AQ-1, Construction Air Quality Program, shall be implemented during construction of the ITC Project.

Basis for Finding: Mitigation Measure MM AQ-1 requires the implementation of PDF AQ-1 from the Project's CCP to reduce air quality emissions during construction. PDF AQ-1 requires the Project to use equipment that meets the U.S. Environmental Protection Agency (USEPA)'s Final Tier 4 emissions standards for off-road diesel-powered construction equipment with 50 horsepower (hp) or greater, for all phases of construction activity. With implementation of PDF AQ-1, this impact would be **less than significant**.

Finding: Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Recirculated Draft EIR. Impacts will be less than significant.

Impact AQ-3: **The Project could expose sensitive receptors to substantial pollutant concentrations during construction. (Refer to pages 4.2-70 through 4.2-87 of the Recirculated Draft EIR.)**

MM AQ-1: PDF AQ-1, Construction Air Quality Program, shall be implemented during construction of the ITC Project.

Basis for Finding: Mitigation Measure MM AQ-1 requires the implementation of PDF AQ-1 from the Project's CCP to reduce air quality emissions during construction. PDF AQ-1 requires the Project to use equipment that meets the U.S. Environmental Protection Agency (USEPA)'s Final Tier 4 emissions standards for off-road diesel-powered construction equipment with 50 horsepower (hp) or greater, for all phases of construction activity. With implementation of PDF AQ-1, this impact would be **less than significant**.

Finding: Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Recirculated Draft EIR. Impacts will be less than significant.

B. Biological Resources

Impact BIO-1: **Construction and operation of the Project could 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. (Refer to pages 4.3-45 through 4.3-50 of the Draft EIR.)**

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.

Basis for Finding: With the implementation of MM BIO-1, construction of the Project would no longer have the potential to disturb active nests for nesting birds and raptors. Active nests would be identified, and suitable buffers would be established to ensure that construction activities do not disturb nesting birds. Mitigation measures would thus ensure that the Project would not cause a substantial reduction in local population size or reduce reproductive success to birds and raptors.Thus, this impact would be considered **less than significant.**

Finding: Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Recirculated Draft EIR. Impacts would be reduced to less than significant.

C. Cultural Resources

Impact CUL-2: **Construction and operation of the Project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. (Refer to pages 4.4-61 through 4.4-62 of the Recirculated Draft EIR.)**

MM TCR-1: **Retention of a Tribal Cultural Resources Monitor/Consultant**.

Prior to the commencement of any ground disturbing activity at the Project alignment, the Project contractor, in consultation with the City, shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (US Department of the Interior, 2008) to carry out all mitigation related to cultural resources. In addition, a Native American Monitor shall be designated by the Gabrieleno Band of Mission Indians-Kizh Nation – the tribe that consulted on this project pursuant to Assembly Bill AB 52 (the "Tribe" or the "Consulting Tribe"). If no Native American Monitor is designated within a reasonable period of time (not to exceed 30 days), the activity can commence without the designated Monitor. A copy of the executed contract(s) with the qualified archaeologist and Native American Monitor shall be submitted to the City of Inglewood Planning and Building Department prior to the

issuance of any permit necessary to commence a ground-disturbing activity. The Native American Monitor will only be present on-site during the construction phases that involve ground-disturbing activities. Ground disturbing activities are defined by the Tribe as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project area. The Native American Monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project alignment are completed, or when the Native American Representatives and Native American Monitor have indicated that all upcoming ground- disturbing activities at the Project alignment have little to no potential for impacting Tribal Cultural Resources. Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 50 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the qualified archaeologist and the Native American Monitor. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes.

If human remains and/or grave goods are discovered or recognized at the Project alignment, all ground disturbance shall immediately cease, and the county coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the Project alignment while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]). If a non-Native American resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local

school or historical society in the area for educational purposes. **MM TCR-2** through **MM TCR-5** will supplement **MM TCR-1**.

MM TCR-2: Monitoring and Mitigation Program.

Prepare, design, and implement an Archaeological Monitoring and Mitigation Program for the Project. The Monitoring and Mitigation Program shall define pre-construction coordination, construction monitoring for excavations based on the activities and depth of disturbance planned for each portion of the Project area, data recovery (including halting or diverting construction so that archaeological remains can be evaluated and recovered in a timely manner), artifact and feature treatment, procurement, and reporting. The Monitoring and Mitigation Program shall be prepared and approved by a qualified archaeologist prior to the issuance of the first grading permit.

MM TCR-3: Cultural Resources Sensitivity Training.

The qualified archaeologist and Native American Monitor shall conduct construction-worker archaeological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.) and will present the Archaeological Monitoring and Mitigation Program as outlined in **MM TCR-2**, for all construction personnel conducting, supervising, or associated with demolition and ground disturbance, including utility work, for the Project. In the event construction crews are phased or rotated, additional training shall be conducted for new construction personnel working on ground-disturbing activities. Construction personnel shall be informed of the types of prehistoric and historic archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. Documentation shall be retained by the qualified archaeologist demonstrating that the appropriate construction personnel attended the training.

MM TCR-4: Archaeological and Native American Monitoring

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

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

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

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

In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, a Cultural Resources Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with the City and contractor, and appropriate Native American representatives (if the find is of Native American origin). The Cultural Resources Treatment Plan shall provide for the adequate recovery of the scientifically consequential information contained in the archaeological resource through laboratory processing and analysis of the artifacts. The Cultural Resources Treatment Plan will further make recommendations for the ultimate curation of any archaeological materials, which shall be curated at a public, non-profit curation facility, university, or museum with a research interest in the materials, if such an institution agrees to accept them. If resources are determined to be Native American in origin, they will first be offered to the Tribe for permanent curation, repatriation, or reburial, as directed by the Tribe. If no institution or Tribe accepts the archaeological material, then the material shall be donated to a local school or historical society in the area for educational purposes.

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

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

Basis for Finding: With implementation of mitigation measures MM TCR-1 through MM TCR-4, construction of the Project would no longer have the potential to cause a substantial adverse change in the significance of an archaeological resource. With implementation of MM TCR-1, the City shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology to carry out all mitigation related to cultural resources. In addition, a Native American Monitor shall be designated by the Gabrieleno Band of Mission Indians-Kizh Nation. With implementation of Mitigation Measure MM TCR-2, the City shall prepare, design, and implement an Archaeological Monitoring and Mitigation Program for the Project. With implementation of Mitigation Measure MM TCR-3, the qualified archaeologist and Native American Monitor shall conduct construction-worker archaeological resources sensitivity training and will present the Archaeological Monitoring and Mitigation Program for all construction personnel for the Project. With implementation of Mitigation Measure MM TCR-4, the qualified archaeologist will oversee the archaeological and Native American monitors who shall be retained to be present and work in tandem, monitoring during construction excavations as defined in the Monitoring and Mitigation Program. With implementation of Mitigation Measures MM TCR-1, MM TCR-2, MM TCR-3, and MM TCR-4, this impact would be **less than significant**.

Finding: Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Recirculated Draft EIR. Impacts would be reduced to less than significant.

Impact CUL-3: **Construction and operation of the Project could disturb any human remains, including those interred outside of formal cemeteries. (Refer to page 4.4-63 of the Recirculated Draft EIR.)**

MM TCR-1: **Retention of a Tribal Cultural Resources Monitor/Consultant**.

Prior to the commencement of any ground disturbing activity at the Project alignment, the Project contractor, in consultation with the City, shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (US Department of the Interior, 2008) to carry out all mitigation related to

cultural resources. In addition, a Native American Monitor shall be designated by the Gabrieleno Band of Mission Indians-Kizh Nation – the tribe that consulted on this project pursuant to Assembly Bill AB 52 (the "Tribe" or the "Consulting Tribe"). If no Native American Monitor is designated within a reasonable period of time (not to exceed 30 days), the activity can commence without the designated Monitor. A copy of the executed contract(s) with the qualified archaeologist and Native American Monitor shall be submitted to the City of Inglewood Planning and Building Department prior to the issuance of any permit necessary to commence a ground-disturbing activity. The Native American Monitor will only be present on-site during the construction phases that involve ground-disturbing activities. Ground disturbing activities are defined by the Tribe as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project area. The Native American Monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project alignment are completed, or when the Native American Representatives and Native American Monitor have indicated that all upcoming ground- disturbing activities at the Project alignment have little to no potential for impacting Tribal Cultural Resources. Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 50 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the qualified archaeologist and the Native American Monitor. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes.

If human remains and/or grave goods are discovered or recognized at the Project alignment, all ground disturbance shall immediately cease, and the county coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the Project alignment while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]). If a non-Native American resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include

implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes. **MM TCR-2** through **MM TCR-5** will supplement **MM TCR-1**.

MM TCR-3: Cultural Resources Sensitivity Training.

The qualified archaeologist and Native American Monitor shall conduct construction-worker archaeological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.) and will present the Archaeological Monitoring and Mitigation Program as outlined in **MM TCR-2**, for all construction personnel conducting, supervising, or associated with demolition and ground disturbance, including utility work, for the Project. In the event construction crews are phased or rotated, additional training shall be conducted for new construction personnel working on ground-disturbing activities. Construction personnel shall be informed of the types of prehistoric and historic archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. Documentation shall be retained by the qualified archaeologist demonstrating that the appropriate construction personnel attended the training.

MM TCR-5: Inadvertent Discoveries Related to Human Remains.

In the event of the unanticipated discovery of human remains during excavation or other ground disturbance related to the Project, all work shall immediately cease within 150 feet of the discovery and the County Coroner shall be contacted in accordance with PRC Section 5097.98[2] and Health and Safety Code Section 7050.5.[3] Additionally, the contractor shall notify the City, and the tribal cultural resources monitor and archaeological monitor.

The City, as the Project sponsor, and the contractor shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity, is adequately protected according to generally accepted cultural and tribal standards or practices, and

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2 NAGPRA, Title 43. Public Lands: Interior, Subtitle A. Office of the Secretary of the Interior, Part 10. Native American Graves Protection and Reparation Regulations, § 5097.98 – Notification of discovery of Native American human remains, descendants; disposition of human remains and associated grave goods.

3 California / Health and Safety Code - HSC / CHAPTER 2. General Provisions [7050.5. - 7055.] / Section 7050.5.

that further ground-disturbing activities take into account the possibility of multiple burials.

No further excavation or disturbance of the discovery or any nearby area reasonably suspected to overlie adjacent remans (as determined by the qualified archaeologist and/or tribal cultural resources monitor) shall occur until the coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If such a discovery occurs, a temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected (as determined by the qualified archaeologist and/or cultural resources monitor), and consultation and treatment could occur as prescribed by law. As required by law, the coroner would determine within two working days of being notified if the remains are subject to his or her authority.

If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC. In accordance with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98 (as amended by AB 2641), the NAHC would make an MLD determination.

If the Tribe is designated MLD, the following standards shall apply and the following requirements and treatment measures shall be implemented.

1. To the Tribe, the term “human remains” encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. These remains are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

2. Prior to the continuation of ground disturbing activities, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard

should be posted outside of working hours. As stated by the Tribe as part of the Project's AB 52 consultation:

The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. The Tribe will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically, and respectfully.

3. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. The Tribe shall approve additional types of documentation for data recovery purposes. Cremations must either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. Scientific study or the utilization of any invasive diagnostics on human remains of Native American origin.

4. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if feasible. These items shall be retained and reburied within six months of recovery if feasible. The site of reburial/repatriation shall be on the Project area, but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

   If the Tribe is not designated MLD, each occurrence of human remains and associated funerary objects shall be stored using opaque cloth bags. All human remains, funerary objects, sacred objects, and objects of cultural patrimony shall be preserved in place where feasible and to consult with the tribal cultural resources monitor and/or the MLD about appropriate treatment if removal is required. If remains are removed, they shall be removed to a secure container on site, if possible, with consultation with of the qualified archaeologist and/or tribal cultural resources monitor. These items shall be retained and reburied within six months of recovery or as directed by the qualified archaeologist and/or tribal cultural resources monitor. The site of reburial/repatriation shall be within the Project footprint, or at a location agreed upon between the MLD and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

Basis for Finding: With implementation of Mitigation Measure MM TCR-1, MM TCR-3, and MM TCR-5, construction of the Project would no longer have the potential to cause a substantial adverse change in the significance of an archaeological resource. With implementation of MM TCR-1, the City shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology to carry out all mitigation related to cultural resources. In addition, a Native American Monitor shall be designated by the Gabrieleno Band of Mission Indians-Kizh Nation. With implementation of Mitigation Measure MM TCR-3, the qualified archaeologist and Native American Monitor shall conduct construction-worker archaeological resources sensitivity training and will present the Archaeological Monitoring and Mitigation Program for all construction personnel for the Project. With implementation of Mitigation Measure MM TCR-5, the City and contractor shall ensure the cessation of all construction work in the event of the unanticipated discovery of human remains during excavation related to the Project. With implementation of Mitigation Measures MM TCR-1, MM TCR-3, and MM TCR-5, this impact would be **less than significant**.

Finding: Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Recirculated Draft EIR. Impacts would be reduced to less than significant.

D. Geology and Soils

Impact GEO-1: **The Project could directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault?**

MM GEO-1: **Project Design.** The Project shall be designed to accommodate fault rupture where present in accordance with applicable Caltrans guidelines, including MTD 20-8, *Analysis of Ordinary Bridges that Cross Faults*, dated January 2013; and MTD 20-10, *Fault Rupture*, dated January 2013, where any portion of a structure falls within an APEFZ, or where any portion of a structure falls within approximately 100 meters (330 feet) of well-mapped active faults, or within 300 meters (1,000 feet) of an un-zoned fault (not in an APEFZ) that is Holocene or younger in age.

Stations and elevated structures for the ATS guideway shall be located to avoid or accomodate the fault rupture hazard where present with refinement of station and ATS guideway placement worked into final design as needed based on project specific geologic surveys, recommendations and criteria. Bridge type structures, such as the ATS guideway, shall be designed to take into account potential displacement from a fault

offset, dynamic response due to ground shaking, and any other fault-induced hazards (e.g., creep) that may occur. The design shall be in accordance with the Caltrans MTD 20-8, which defines a method for determining the potential displacement at columns and abutments at fault crossings and designing the structure so it can slide without falling.

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

The phased investigation shall be prepared by registered professionals (i.e., California Professional Civil Engineer, Professional Engineering Geologist with experience in fault evaluations) and include a fault investigation conducted along the trace of the Townsite Fault to refine its location and assess its activity level where it crosses the ATS guideway and stations.

The following methods shall be included in the investigation:

- Aerial photograph analysis;
- Geophysical surveys (e.g., seismic reflection and/or seismic refraction) to refine the location of the Townsite fault and inform subsequent targeted fault hazard exploration as necessary;
- Targeted fault trenching based on the findings of additional geophysical studies to locate the potential Townsite Fault where it crosses the proposed ATS alignment; and
- Exploratory drilling and sampling (e.g., hollow stem auger and CPT [cone penetration test] borings), as necessary, if the trace of the Townsite fault cannot be adequately delineated across the proposed ATS alignment through the means of fault trenching.

Based on the results of these investigations, column placements and facility designs shall be adjusted to accommodate geologic conditions identified. Further, the facilities shall be designed in accordance with applicable Caltrans guidelines including MTD 20-8, Analysis of Ordinary *Bridges* that Cross Faults, and MTD 20-10, Fault Rupture. Stations/structures shall be located to avoid the fault rupture hazard where present.

Columns and foundations for the guideway and stations, as well as any other ATS facilities shall be located to avoid the fault rupture hazard where present.

Probabilistic procedures shall follow those outlined in the *Fault Rupture Hazard Evaluation* (**Appendix K.1**). If further study of the fault rupture is conducted, then procedures as outlined in CGS Note 49[4] shall be followed.

MM GEO-3: The proposed ATS system facilities shall be designed in accordance with applicable Caltrans guidelines including Memo to Designers 20-8 (Analysis of Ordinary Bridges that Cross Faults) and 20-10 (Fault Rupture). The response spectra provided in the *Development of Seismic Design Criteria in Support of Draft EIR - Seismic Design Criteria* (**Appendix K.2**) shall be considered applicable for both aerial guideway and ancillary structures within each segment of the alignment under the guideway and each station.

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

Basis for Finding: With implementation of Mitigation Measure MM GEO-1, the Project will be designed to accommodate fault rupture where present in accordance with applicable Caltrans guidelines. Moreover, stations and elevated structures for the ATS guideway shall be designed in locations avoiding or accomodating fault rupture hazards where present. With implementation of Mitigation Measure MM GEO-2, a phased investigation to further define the trend of the Townsite Fault will be conducted to support adjustments to the Project's final design. With implementation of Mitigation Measure MM GEO-3, the ATS facilities will be designed in accordance with applicable Caltrans guidelines and seismic design criteria. With implementation of Mitigation Measures MM GEO-1, MM GEO-2, and MM GEO-3, this impact would be **less than significant**.

Finding: Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Recirculated Draft EIR. Impacts would be reduced to less than significant.

Impact GEO-2: **The Project could directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?**

MM GEO-1: **Project Design.** The Project shall be designed to accommodate fault rupture where present in accordance with applicable Caltrans guidelines, including MTD 20-8, *Analysis of Ordinary Bridges that Cross Faults*, dated January 2013; and MTD 20-10, *Fault Rupture*, dated January 2013, where any portion of a structure falls within an APEFZ, or where any portion of a structure falls within approximately 100 meters (330 feet) of well-mapped

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

active faults, or within 300 meters (1,000 feet) of an un-zoned fault (not in an APEFZ) that is Holocene or younger in age.

Stations and elevated structures for the ATS guideway shall be located to avoid or accommodate the fault rupture hazard where present with refinement of station and ATS guideway placement worked into final design as needed based on project specific geologic surveys, recommendations and criteria. Bridge type structures, such as the ATS guideway, shall be designed to take into account potential displacement from a fault offset, dynamic response due to ground shaking, and any other fault-induced hazards (e.g., creep) that may occur. The design shall be in accordance with the Caltrans MTD 20-8, which defines a method for determining the potential displacement at columns and abutments at fault crossings and designing the structure so it can slide without falling.

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

The phased investigation shall be prepared by registered professionals (i.e., California Professional Civil Engineer, Professional Engineering Geologist with experience in fault evaluations) and include a fault investigation conducted along the trace of the Townsite Fault to refine its location and assess its activity level where it crosses the ATS guideway and stations.

The following methods shall be included in the investigation:

- Aerial photograph analysis;
- Geophysical surveys (e.g., seismic reflection and/or seismic refraction) to refine the location of the Townsite fault and inform subsequent targeted fault hazard exploration as necessary;
- Targeted fault trenching based on the findings of additional geophysical studies to locate the potential Townsite Fault where it crosses the proposed ATS alignment; and
- Exploratory drilling and sampling (e.g., hollow stem auger and CPT [cone penetration test] borings), as necessary, if the trace of the Townsite fault cannot be adequately delineated across the proposed ATS alignment through the means of fault trenching.

Based on the results of these investigations, column placements and facility designs shall be adjusted to accommodate geologic conditions identified. Further, the facilities shall be designed in accordance with applicable Caltrans guidelines including MTD 20-8, Analysis of Ordinary *Bridges* that Cross Faults, and MTD 20-10, Fault Rupture. Stations/structures shall be located to avoid the fault rupture hazard where present.

Columns and foundations for the guideway and stations, as well as any other ATS facilities shall be located to avoid the fault rupture hazard where present.

Probabilistic procedures shall follow those outlined in the *Fault Rupture Hazard Evaluation* (**Appendix K.1**). If further study of the fault rupture is conducted, then procedures as outlined in CGS Note 49[5] shall be followed.

MM GEO-3: The proposed ATS system facilities shall be designed in accordance with applicable Caltrans guidelines including Memo to Designers 20-8 (Analysis of Ordinary Bridges that Cross Faults) and 20-10 (Fault Rupture). The response spectra provided in the *Development of Seismic Design Criteria in Support of Draft EIR - Seismic Design Criteria* (**Appendix K.2**) shall be considered applicable for both aerial guideway and ancillary structures within each segment of the alignment under the guideway and each station.

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

Basis for Finding: With implementation of Mitigation Measure MM GEO-1, the Project will be designed Projectto accommodate fault rupture where present in accordance with applicable Caltrans guidelines. Moreover, stations and elevated structures for the ATS guideway shall be designed in locations avoiding or accommodating fault rupture hazards where present. With implementation of Mitigation Measure MM GEO-2, a phased investigation to further define the trend of the Townsite Fault will be conducted to support adjustments to the Project's final design. With implementation of Mitigation Measure MM GEO-3, the City the ATS facilities will be designed in accordance with applicable Caltrans guidelines and seismic design criteria. With implementation of Mitigation Measures MM GEO-1, MM GEO-2, and MM GEO-3, this impact would be **less than significant**.

Finding: Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Recirculated Draft EIR. Impacts would be reduced to less than significant.

Impact GEO-3: **The Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

MM GEO-4: A qualified paleontologist meeting the SVP standards shall be retained by the project applicant and approved by the City prior to the approval of grading permits. The qualified paleontologist shall:

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

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

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

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

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

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

Basis for Finding: With implementation of Mitigation Measure MM GEO-4, the a paleontologist meeting the SVP Standards to prepare, design, and implement a paleontology monitoring and mitigation program for the Project consistent with SVP Guidelines will be retained. Moreover, this monitoring and mitigation program shall include education and sensitivity training for construction workers, guidelines for on-site paleontological monitors to issue stop-work orders if fossils are found, procedures for paleontological resource evaluation in the event of discovery, and final reporting procedure guidelines for submission to the City. With implementation of Mitigation Measure MM GEO-4, this impact would be **less than significant**.

Finding: Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Recirculated Draft EIR. Impacts would be reduced to less than significant.

E. Tribal Cultural Resources

Impact TCR-1: Construction and operation of the Project could cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. (Refer to pages 4.13-22 through 4.13-31 of the Recirculated Draft EIR.)

MM TCR-1: Retention of a Tribal Cultural Resources Monitor/Consultant.

Prior to the commencement of any ground disturbing activity at the Project alignment, the Project contractor, in consultation with the City, shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for

archaeology (US Department of the Interior, 2008) to carry out all mitigation related to cultural resources. In addition, a Native American Monitor shall be designated by the Gabrieleno Band of Mission Indians-Kizh Nation – the tribe that consulted on this project pursuant to Assembly Bill AB 52 (the "Tribe" or the "Consulting Tribe"). If no Native American Monitor is designated within a reasonable period of time (not to exceed 30 days), the activity can commence without the designated Monitor. A copy of the executed contract(s) with the qualified archaeologist and Native American Monitor shall be submitted to the City of Inglewood Planning and Building Department prior to the issuance of any permit necessary to commence a ground-disturbing activity. The Native American Monitor will only be present on-site during the construction phases that involve ground-disturbing activities. Ground disturbing activities are defined by the Tribe as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project area. The Native American Monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project alignment are completed, or when the Native American Representatives and Native American Monitor have indicated that all upcoming ground- disturbing activities at the Project alignment have little to no potential for impacting Tribal Cultural Resources. Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 50 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the qualified archaeologist and the Native American Monitor. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes.

If human remains and/or grave goods are discovered or recognized at the Project alignment, all ground disturbance shall immediately cease, and the county coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per Public Resources Code section 5097.98, subdivision (d)(1) and (2). Work may continue on other parts of the Project alignment while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]). If a non-Native American resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines section 15064.5, subdivision (f) for historical resources and Public Resources Code section 21083.2, subdivision (b) for unique archaeological resources. Preservation

in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes. **MM TCR-2** through **MM TCR-5** will supplement **MM TCR-1**.

MM TCR-2: Monitoring and Mitigation Program.

Prepare, design, and implement an Archaeological Monitoring and Mitigation Program for the Project. The Monitoring and Mitigation Program shall define pre-construction coordination, construction monitoring for excavations based on the activities and depth of disturbance planned for each portion of the Project area, data recovery (including halting or diverting construction so that archaeological remains can be evaluated and recovered in a timely manner), artifact and feature treatment, procurement, and reporting. The Monitoring and Mitigation Program shall be prepared and approved by a qualified archaeologist prior to the issuance of the first grading permit.

MM TCR-3: Cultural Resources Sensitivity Training.

The qualified archaeologist and Native American Monitor shall conduct construction-worker archaeological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.) and will present the Archaeological Monitoring and Mitigation Program as outlined in **MM TCR-2**, for all construction personnel conducting, supervising, or associated with demolition and ground disturbance, including utility work, for the Project. In the event construction crews are phased or rotated, additional training shall be conducted for new construction personnel working on ground-disturbing activities. Construction personnel shall be informed of the types of prehistoric and historic archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. Documentation shall be retained by the qualified archaeologist demonstrating that the appropriate construction personnel attended the training.

MM TCR-4: Archaeological and Native American Monitoring

The qualified archaeologist will oversee archaeological and Native American monitors who shall be retained to be present and work in tandem, monitoring during construction

excavations such as grading, trenching, or any other excavation activity associated with the Project and as defined in the Monitoring and Mitigation Program. If, after advanced notice of potential ground-disturbing activities, the Native American representative declines, is unable, or does not respond to the notice, construction can proceed under supervision of the qualified archaeologist. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the quantity and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the qualified archaeologist and the Native American Monitor.

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

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

In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, a Cultural Resources Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with the City and contractor, and appropriate Native American representatives (if the find is of Native American origin). The Cultural Resources Treatment Plan shall provide for the adequate recovery of the scientifically consequential information contained in the archaeological resource through laboratory processing and analysis of the artifacts. The Cultural Resources Treatment Plan will further make recommendations for the ultimate curation of any archaeological materials, which shall be curated at a public, non-profit curation facility, university, or museum with a research interest in the materials, if such an institution agrees to accept them. If resources are determined to be Native American in origin, they will first be offered to the Tribe for permanent curation, repatriation, or reburial, as directed by the Tribe. If no institution or Tribe accepts the archaeological material, then the material shall be donated to a local school or historical society in the area for educational purposes.

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

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

MM TCR-5: Inadvertent Discoveries Related to Human Remains.

In the event of the unanticipated discovery of human remains during excavation or other ground disturbance related to the Project, all work shall immediately cease within 150 feet of the discovery and the County Coroner shall be contacted in accordance with Public Resources Code section 5097.98[6] and Health and Safety Code section 7050.5.[7] Additionally, the contractor shall notify the City, and the tribal cultural resources monitor and archaeological monitor.

The City, as the Project sponsor, and the contractor shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity, is adequately protected according to generally accepted cultural and tribal standards or practices, and that further ground-disturbing activities take into account the possibility of multiple burials.

No further excavation or disturbance of the discovery or any nearby area reasonably suspected to overlie adjacent remans (as determined by the qualified archaeologist and/or tribal cultural resources monitor) shall occur until the coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code section 5097.98. If such a discovery occurs, a temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected (as determined by the qualified archaeologist and/or cultural resources monitor), and consultation and treatment could occur as prescribed by law. As required by law, the

6 NAGPRA, Title 43. Public Lands: Interior, Subtitle A. Office of the Secretary of the Interior, Part 10. Native American Graves Protection and Reparation Regulations, § 5097.98 – Notification of discovery of Native American human remains, descendants; disposition of human remains and associated grave goods.

7 California / Health and Safety Code - HSC / CHAPTER 2. General Provisions [7050.5. - 7055.] / Section 7050.5.

coroner would determine within two working days of being notified if the remains are subject to his or her authority.

If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC. In accordance with Health and Safety Code section 7050.5, subdivision (c), and Public Resources Code section 5097.98 (as amended by AB 2641), the NAHC would make an MLD determination.

If the Tribe is designated MLD, the following standards shall apply and the following requirements and treatment measures shall be implemented.

1. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. These remains are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

2. Prior to the continuation of ground disturbing activities, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. As stated by the Tribe as part of the Project's AB 52 consultation:

   The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. The Tribe will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically, and respectfully.

3. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. The Tribe shall approve additional types of documentation for data recovery purposes. Cremations must either be removed in bulk or by means as necessary to ensure

completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. Scientific study or the utilization of any invasive diagnostics on human remains of Native American origin.

4. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if feasible. These items shall be retained and reburied within six months of recovery if feasible. The site of reburial/repatriation shall be on the Project area, but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

If the Tribe is not designated MLD, each occurrence of human remains and associated funerary objects shall be stored using opaque cloth bags. All human remains, funerary objects, sacred objects, and objects of cultural patrimony shall be preserved in place where feasible and to consult with the tribal cultural resources monitor and/or the MLD about appropriate treatment if removal is required. If remains are removed, they shall be removed to a secure container on site, if possible, with consultation with of the qualified archaeologist and/or tribal cultural resources monitor. These items shall be retained and reburied within six months of recovery or as directed by the qualified archaeologist and/or tribal cultural resources monitor. The site of reburial/repatriation shall be within the Project footprint, or at a location agreed upon between the MLD and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

Basis for Finding: With implementation of Mitigation Measure MM TCR-1 through MM TCR-5, construction of the Project would no longer have the potential to cause a substantial adverse change in the significance of a tribal cultural resource. With implementation of MM TCR-1, the a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology to carry out all mitigation related to cultural resources shall be retained. In addition, a Native American Monitor shall be designated by the Gabrieleno Band of Mission Indians-Kizh Nation. With implementation of Mitigation Measure MM TCR-2, the an Archaeological Monitoring and Mitigation Program for the Project will be prepared. With implementation of Mitigation Measure MM TCR-3, the qualified archaeologist and Native American Monitor shall conduct construction-worker archaeological resources sensitivity training and will present the Archaeological Monitoring and Mitigation Program for all construction personnel for the Project. With implementation of Mitigation Measure MM TCR-4, the

qualified archaeologist will oversee the archaeological and Native American monitors who shall be retained to be present and work in tandem, monitoring during construction excavations as defined in the Monitoring and Mitigation Program. With implementation of Mitigation Measure MM TCR-5, the City and contractor shall ensure the cessation of all construction work in the event of the unanticipated discovery of human remains during excavation related to the Project. With implementation of Mitigation Measures MM TCR-1, MM TCR-2, MM TCR-3, MM TCR-4 and MM TCR-5, this impact would be **less than significant**.

Finding: Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Recirculated Draft EIR. Impacts would be reduced to less than significant.

F. Utilities and Service Systems

Impact U-1: **Construction and operation of the Project could require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. (Refer to pages 4.14-47 through 4.14-56 of the Recirculated Draft EIR.)**

MM UT-1: Prior to the award of the DBFOM contract, and start of any demolition or construction activities, the City or DBFOM shall be responsible for identifying the locations of existing utilities potentially affected by the Project. This shall include coordinating with all existing utility providers for wet and dry utilities (water, sewer, gas, electric, and telecommunications) to obtain documentation of existing utility locations. Field verification (i.e., potholing and other methods as appropriate) shall be conducted to document the locations of all utilities within 20 feet of the Project's guideway and station foundations.

Based on the information from the field investigations, the DBFOM contractor shall be responsible for confirming the location of existing utilities and coordinating with the appropriate utility owners/operators to determine specific set back requirements for each utility line and the need for any stabilization for protection in place or relocation measures.

MM UT-2: Prior to the award of the DBFOM contract, and start of construction, the City shall contact Southern California Edison (SCE) and request an updated system Distribution Study to determine the amount of load that SCE could accommodate and required infrastructure upgrades in order to meet the Project's recommended full redundancy design. Should SCE

determine that additional system upgrades are required, such upgrades shall be the responsibility of the DBFOM contractor and/or the City to complete (including design and any additional environmental clearance), subject to the review and approval of SCE and the City, as applicable.

Basis for Finding: With implementation of Mitigation Measure MM U-1, the City or DBFOM contractor shall be responsible for identifying the locations of existing utilities potentially affected by the Project. Moreover, the DBFOM contractor shall be responsible for confirming the location of existing utilities and coordinating with the appropriate utility owners/operators to determine specific set back requirements for each utility line and the need for any stabilization for protection in place or relocation measures. With implementation of Mitigation Measure MM U-2, the City shall contact SCE and request an updated system Distribution Study to determine the amount of load that SCE could accommodate and required infrastructure upgrades in order to meet the Project's recommended full redundancy design. With implementation of Mitigation Measures MM U-1 and MM U-2, this impact would be **less than significant**.

Finding: Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Recirculated Draft EIR. Impacts would be reduced to less than significant.

IV. EVALUATION OF PROJECT ALTERNATIVES

The Recirculated Draft EIR identified and analyzed in detail six alternatives to the Project. These alternatives were selected for detailed analysis because, among other things, they were identified as "potentially feasible." (CEQA Guidelines, § 15126.6, subd. (a).) Alternatives that are identified as not "potentially feasible" may be eliminated from detailed analysis in the EIR.

The City Council now adopts findings concerning the feasibility of these alternatives. In adopting these findings, the City Council has considered the Project alternatives presented and analyzed in the EIR and presented during the comment period and public hearing process. The City Council finds, based on specific economic, legal, social, technological, or other considerations, that these alternatives are infeasible. Based on the impacts identified in the Recirculated DEIR and other reasons summarized below, and as supported by substantial evidence in the record, the City Council finds that approval and implementation of the Project as proposed is the most desirable, feasible, and appropriate action and hereby rejects the other alternatives and other combinations and/or variations of alternatives as infeasible based on consideration of the relevant factors set forth in CEQA Guidelines section 15126.6, subdivision (f). (See also CEQA Guidelines, §, subd. (a)(3).)

A. Summary of Alternatives Considered

CEQA mandates that an EIR evaluate a reasonable range of alternatives to the Project or the Project location that generally reduce or avoid potentially significant impacts of the Project. CEQA requires that every EIR also evaluate a "No Project" alternative. Alternatives provide a basis of comparison to the Project in terms of their significant impacts and their ability to meet project objectives. This comparative analysis is used to consider reasonable, potentially feasible options for minimizing environmental consequences of the Project. Here, the Recirculated Draft EIR identified and analyzed in detail six alternatives to the Project. These alternatives were selected for detailed analysis because, among other things, they were identified as "potentially feasible." (CEQA Guidelines, § 15126.6, subd. (a).) The six alternatives to the Project analyzed in the Recirculated Draft EIR are the (1) No Project; (2) Bus Rapid Transit (BRT) System; (3) Market Street Pedestrian Promenade; (4) 4th Station Alternative; (5) Prairie Avenue Single Station Alternative; and (6) Maintenance and Storage Facility (MSF) Site Alternative.

The City Council rejects the Alternatives set forth in the Recirculated Draft EIR and summarized below because the City Council finds that there is substantial evidence, including evidence of economic, legal, social, technological, and other considerations described in this Section in addition to those described in Section F below under CEQA Guidelines section 15091, subdivision (a)(3), that make infeasible such Alternatives. In making these determinations, the City Council is aware that CEQA defines "feasibility" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." (CEQA Guidelines, § 15364.) The Council is also aware that under CEQA case law the concept of "feasibility" encompasses (i) the question of whether a particular alternative promotes the underlying goals and objectives of a project. and (ii) the question of whether an alternative is "desirable" from a policy standpoint to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors.

Alternative 1: No Project

Description

Under CEQA, the No Project Alternative must consider the effects of not approving the project under consideration. The No Project Alternative describes the environmental conditions that exist at the time that the environmental analysis commences, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved. (CEQA Guidelines, § 15126.6, subdivision (e)(2).)

The No Project Alternative considers conditions if the Project is not built. No new transportation infrastructure would be built within the Project study area, aside from transportation projects that are

currently under construction or funded for construction and operation by 2027. These projects include transit projects funded by Measure R, Measure M, and specified in the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Existing infrastructure and future planned and funded projects assumed under the No Project alternative include:

- Metro K Line –Currently under construction (2021), operating start date (Fall 2022)
- Implementation of the Citywide Event Transportation Management and Operations Plan
- Street improvements being constructed as part of the Los Angeles International Airport Landside Access Modernization Program and the Inglewood Basketball and Entertainment Center (IBEC) projects.
- Existing Bus Service – Metro Rapid and Metro Local

Existing public transit and private transportation operators would continue to provide service. Public transit operators would likely increase service in response to the projected growth in the number of visitors and residents that would occur as result of new and proposed major activity centers being developed in the City in the Downtown and Hollywood Park areas.

The LASED at Hollywood Park includes SoFi Stadium and additional development allowed by the Hollywood Park Specific Plan. Higher density mixed-use development is also planned in the vicinity of the Metro Downtown Inglewood station near Florence Avenue and Market Street being developed within the Crenshaw/Imperial TOD Plan Area. These projects and improvements would reasonably be expected to occur in the foreseeable future if the Project were not approved based on current plans.

Throughout 2020, the City of Inglewood developed a Citywide Transportation Management and Operations Plan (TMOP) focused on addressing future traffic demands that may result from events at the stadium. The Inglewood TMOP establishes a plan that provides public information, reduces unwarranted traffic through adjacent neighborhoods, and promotes the use of alternative modes of transportation as described below.

City of Inglewood Event Park and Ride Shuttle Program and Intermodal Transit Facility at Hollywood Park

To address the limited pre-sold on-site parking available at SoFi Stadium, the City has established a remote parking and shuttle program, known as the I Park & Go Program, which considers comprehensive access, circulation, and traffic management for residents, visitors, and businesses on NFL game days and during large special events.

Given the growing event-day demand of the City's I Park & Go Program, the City would not only continue the use at the ITF Lot but also utilize the vacant lot at the southwest corner of Prairie Avenue and Manchester Boulevard given the limited capacity for increased shuttles at the City's ITF Lot.

Event Transit Service

The City has established a partnership and received support from Metro, Big Blue Bus (Santa Monica), GTrans (Gardena), and Torrance Transit to expand transit service. Under the No Project alternative, the City would work cooperatively with Metro and other municipal bus operators to increase and enhance transit service to City of Inglewood destinations through more frequent headways, additional route options, and other improvements by 2021, if possible. The TMOP addresses both Pre-Event and Post-Event conditions associated with SoFi Stadium at Hollywood Park. The Pre-Event scenario includes bus routes along Pincay Drive, Kareem Court, and Century Boulevard. The Post-Event scenario includes bus routes along Prairie Avenue, Manchester Avenue, Crenshaw Boulevard, Pincay Drive, Kareem Court, and Century Boulevard

Relationship to Project Objectives

The No Project Alternative would not meet any of the City's objectives for the Project, except that it would maintain existing roadway capacity.

Comparative Impacts

Table 5.0-1 at the beginning of Chapter 5.0, Alternatives, of the Recirculated Draft EIR, provides an impact-by-impact comparison of the significant impacts of the Project and Alternative 1. Because no new development would occur, the effects of the No Project Alternative would be a continuation of the existing conditions. Because the Project would not be constructed or operated, none of the impacts identified for the Project would occur under the No Project alternative.

Basis for Finding

While the No Project Alternative would avoid impacts associated with the Project, this alternative would not further any of the Project's objectives or provide any of the benefits contemplated by the Project. Under the No Project Alternative, VMT within the City would continue to increase due to operation of the Forum, the SoFi Stadium, the Performance Arena, the IBEC and the Hollywood Park mixed uses. An increase in VMT would worsen traffic conditions and result in an increase of air quality and greenhouse gas emissions. All of the reasons provide sufficient independent grounds for rejecting this alternative.

Finding

Specific economic, legal, social, technological, or other considerations, make Alternative 1 infeasible.

Alternative 2: Bus Rapid Transit (BRT) System

Description

Bus rapid transit (BRT) is a public transit system designed to provide improved capacity and reliability relative to a conventional bus system. Typically, a BRT system includes roadway lanes that are dedicated to buses, with signal priority to buses at intersections where buses may interact with other traffic, with enhanced coordinated flow. BRT systems typically include design features to optimize passenger boarding and alighting activities, as well as ticket purchases. A BRT corridor is a section of roadway or contiguous roadways served by the uniquely-branded buses along routes with a minimum length of approximately 1.5 to 2 miles.

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

Along the alignment, one eastbound travel lane along Florence Avenue between Market Street and Prairie Avenue; one southbound travel lane along Prairie Avenue between Florence Avenue and Manchester Boulevard; two lanes (one lane in each direction) along Prairie Avenue between Manchester Boulevard and the Inglewood Transit Center Facility; one westbound travel lane along Manchester Boulevard between Prairie Avenue and Market Street; and one northbound lane along Market Street between Manchester Boulevard and Florence Avenue would all be converted (from the existing mixed flow traffic lanes) to provide the Bus-only lane to accommodate the BRT alternative thereby reducing roadway lane capacities for mixed-flow traffic.

[8] City of Inglewood, *New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines,* November 1, 2016

BRT systems typically include the following features:

- Dedicated lanes and alignment:
  - Separate lanes to avoid congested roadways.
  - Dedicated bus-only lanes for faster travel and to ensure that buses are not delayed by mixed traffic congestion. Separate rights of way may be used. Transit malls or "bus streets" may also be created in city centers.
- Off-board fare collection
  - Fare prepayment at the station, instead of on board the bus, eliminates the delay caused by passengers paying on board.
- Intersection treatment
  - Prohibit turns for mixed-flow traffic across the bus lane to reduce delays to the buses, in most cases. Transit Bus priority will often be provided at signalized intersections (using Transit Priority System (TPS) modules at all upgraded signal controllers at intersections along the alignment) to coordinate them to reduce delays by extending the green phase or reducing the red phase in the required direction compared to the normal sequence. Potential additional communication equipment to transmit and receive signals between the intersections and the City's Transportation Management Center may also be provided, as part of this alternative. Equipment to track the locations of the buses and closed-circuit television cameras may also be required / provided at the intersections along the alignment to provide the required monitoring.
- Platform-level boarding
  - Station platforms/stops would be convenient for quick and easy boarding, making them fully accessible for wheelchairs and baby strollers, with minimal delays.

Passenger loading areas would include stops at the following locations:

- Market Street/Florence Avenue in close proximity to the Metro K Line Downtown Inglewood Station. This BRT stop would provide connections to and from the regional light rail system;
- The Forum on Prairie Avenue;
- The City's Intermodal Transit Facility at Hollywood Park providing access to the SoFi Stadium, Hollywood Park Development Site, and IBEC.

High-capacity bus vehicles such as articulated buses may be used; these may have multiple doors for fast entry and exit. To reduce greenhouse gas emissions, vehicles may be electric or alternative fuel technology.

Under the BRT alternative, the Project would not be built and none of the transit infrastructure, street provisions and activities would occur.

Relationship to Project Objectives

The BRT System Alternative would meet some, but not all of the City's objectives for the Project, but not as well as the Project. The objectives to provide a direct and convenient connection to the Metro regional transit system, encourage intermodal transportation systems by providing convenient, safe, and reliable transit and convenient access to businesses in the City would be partially met by this alternative. Although the objective related to providing sufficient transit connection capacity between Metro's regional transit system and the City's new major activity centers would not be met, this alternative would still result in limited increased transit mode split, limited reduction in vehicle trips, and consequently, limited reduction in per-capita vehicle miles traveled to the City's major activity centers. The BRT System Alternative would also partially meet the City's objectives to support the ongoing economic revitalization within the Downtown TOD Plan area and encourage redevelopment and investment within the City in areas served by the Project, but not to the same degree as the Project.

This alternative would partially meet the City's objective to support regional efforts to become more efficient, economically strong, equitable, and sustainable. Though the BRT System Alternative would provide limited operational benefits by reducing traffic volumes along key roadway corridors, it would also reduce the roadway capacities along Florence Avenue, Prairie Avenue, Manchester Boulevard, and Market Street, consequently increasing traffic congestion throughout the City. As such, this alternative would not meet the City's objectives to maintain existing roadway capacity or reduce the City's traffic congestion and alleviate growing demand on the existing roadway networks on both major arterials and residential streets for both nonevent and event days.

Comparative Impacts

Table 5.0-1 at the beginning of Chapter 5.0, Alternatives, of the Recirculated Draft EIR, provides an impact-by-impact comparison of the significant impacts of the Project and Alternative 2.

1. Aesthetics

The Project would not result in significant impacts to the aesthetic character of the community during construction or operation with implementation of the project design features in the ITC CCP and ITC Design Guidelines.

With Alternative 2, the proposed ATS guideway would not be built and existing visual characteristics along Market Street, Manchester Boulevard, and Prairie Avenue would generally be maintained. As such, there would generally be little to no impact to the aesthetic character of the community because the BRT would be contained within the existing roadway system. For this reason, no potentially significant impact to the

visual character of the area would occur with Alternative 2. The Project would change the visual characteristics of the areas located along the proposed alignment but would not result in significant impacts. While Alternative 2 would result in fewer changes to the visual character of the area than the Project, neither this alternative nor the Project would result in significant aesthetic impacts.

2. Air Quality

The BRT System would require some modifications to existing streets in order to create dedicated transit lanes and stops but this construction would be less than the demolition and construction activities associated with the Project. This alternative would not conflict with implementation of the applicable air quality plans and unmitigated construction emissions would be substantially reduced compared to the Project.

Though this Alternative would reduce VMTs, it would only be able to provide approximately 20 percent of the ridership capacity compared to the Project. Moreover, Alternative 2 would reduce average daily traffic (ADT) volumes along key roadway corridors and VMTs on an average weekday basis to a lesser degree than the Project. Specifically, typical weekday nonevent and daily VMT in the City would be reduced by an amount equivalent to 20 percent to 25 percent of those of the Project. Moreover, under Alternative 2 the existing uses that would be removed by the Project would remain operational and would not be replaced by the Project components which generate less air pollutant emissions than the existing uses. As such, Alternative 2 would increase operational air quality impacts in comparison to the Project.

3. Biological Resources

Approximately 502 trees are present along the Project alignment which may require removal during construction of the Project. The BRT System Alternative would only involve minor modifications to existing streets along the public right-of-way where BRT-only lanes along the route are implemented and BRT stops are constructed. Alternative 2 would not, therefore, require the same amount of potential tree removals as the Project. Similar to the Project, operation of Alternative 2 would not diminish the chances for long-term survival of bird species or their habitats and no additional tree and/or ornamental vegetation removals would occur. As such, Alternative 2 would result in similar operational impacts compared to the Project.

4. Cultural Resources

The Project would not result in significant impacts to historic resources on Market Street or the other segments. Alternative 2, which would involve minor modifications of existing streets, construction of bus stops, and the operation of a Bus Rapid Transit system, would also not result in significant impacts to

cultural resources. For this reason, neither this alternative nor the Project would result in significant impacts to cultural resources.

5. Energy Resources

With Alternative 2, the Project would not be built. No demolition or construction activities, which would consume energy resources would occur, except along the public right-of-way where BRT-only lanes and bus stops along the route would be located. As such, Alternative 2 would reduce construction impacts to energy resources. Operation of the Project would consume a maximum net increase of 23.85 million kWh of electricity per year. Alternative 2 would reduce operational electricity impacts. However, the Project would result in a net decrease of 3.61 million kBTU of natural gas per year. Alternative 2 would not require demolition of existing land uses and would reduce traffic along key roadway corridors and VMT on an average weekday basis to a lesser degree than the Project. For this reason, Alternative 2 would increase impacts related to natural gas and petroleum-based fuel consumption. The Project would be consistent with the ECAP and General Plan, which set goals to reduce emissions through increased energy efficiency, renewable energy generation, improved transit options, and reduced consumption and waste. Alternative 2 would address the goals and policies within these plans by improving transit options but to a lesser degree than the Project.

6. Geology and Soils

Under Alternative 2, impacts related to geology and soil conditions, including paleontological resources, would be less compared to the Project. The Project is proposed in an area subject to groundshaking from earthquake events that may occur on faults in the region. Potentially active faults cross the alignment for the Project. Measures are identified to mitigate potential impacts associated with these conditions to less than significant. Because Alternative 2 would occur in the location as the Project, the geological and soils conditions that would be encountered in construction of Alternative 2 would be the similar as with the Project, but because substantially less construction would be required, potential risks associated with ground-shaking would be reduced as compared to the Project. During operations, potential risks from seismic events would be reduced with an at-grade system as no aerial structures would be built. Because there would be substantially less construction with an at-grade BRT system, the potential for accidental discovery of paleontological resources would decrease.

7. Greenhouse Gas Emissions

Under Alternative 2, the Project would not be built. No demolition or construction activities which would produce GHG emissions would occur, except along the public right-of-way where BRT-only lanes and bus stops along the route would be located. As such, Alternative 2 would reduce construction GHG impacts

compared to the Project.

Though this alternative would reduce VMT, it would only be able to provide approximately 20 percent of the ridership capacity of the Project. Alternative 2 would reduce traffic along key roadway corridors and VMT on an average weekday basis to a lesser degree than the Project. Specifically, typical weekday nonevent and daily VMT in the City would be reduced by an amount equivalent to 20 percent to 25 percent of that of the Project. Additionally, dedicated bus lanes would take away roadway carrying capacity for private vehicles and increase local traffic congestion. As such, Alternative 2 would not decrease operational GHG emissions to the same degree as the Project.

Similar to the Project, Alternative 2 would be consistent with the CARB 2017 Scoping Plan Update, SCAG 2020-2045 RTP/SCS, the ECAP, and General Plan, which set goals to reduce GHG emissions by improving transit infrastructure. However, Alternative 2 would improve transit infrastructure at a lesser degree compared to the Project and would not result in more energy efficient uses being developed in place of the less energy efficient existing uses.

8. Hazards and Hazardous Materials

With the BRT Transit system alternative, the Project would not be built. No construction of the guideway and stations in conjunction with the MSF and PDS substations would occur. Construction of the Project would include the demolition of existing buildings that may contain ACM and LBP. Construction activities may also encounter underground storage tanks and soil that may be contaminated. The ITC CCP requires the preparation of plans defining protocols and actions to address this potential and avoid significant impacts. Alternative 2 would not involve the demolition of existing buildings, which may have the potential to release hazardous materials, such as asbestos containing materials (ACMs), lead-based paint (LBP), and other potentially hazardous building materials. Additionally, Alternative 2 would generate a lower amount of construction emissions, which may release toxic air contaminants (TACs) at schools within one-quarter mile. Transportation of hazardous materials during construction of the Project would also not likely occur with this alternative. The potential for accidental release of hazardous materials in the environment would be significantly lessened when compared to the Project.

Operation of the Project would include the use and storage of hazardous materials during operation typical of those used in an industrial setting. Compliance with federal, State, and local laws and regulations relating to transport, storage, disposal, and handling of hazardous materials would minimize any potential for accidental release or upset of hazardous materials during station operation. Under Alternative 2, operation of a BRT system would include the use and storage of similar materials. As such, operational impacts under Alternative 2 would be similar to those of the Project.

9. Land Use and Planning

Alternative 2 would not include the construction of the ATS system or any of the associated supporting facilities. The Project would remove traffic from existing roadways without diminishing the existing traffic capacity or the number of lanes. With the BRT system alternative, an existing lane of travel would be dedicated for use by buses along the route, which would reduce the lane capacity for other vehicles and increase local traffic congestion for passenger vehicles in the community. This increase in congestion on roadways under Alternative 2 would have an indirect effect on the character of the community.

Alternative 2 would be generally consistent with all existing goals, plans, and policies as it would maintain the majority of the infrastructure in the surrounding communities, allowing the goals and objectives of the existing plans to be carried out generally. Notwithstanding, in certain locations there could be conflicts with the design of existing roadways, roadway capacity, and the City's circulation element and amendments to City documents may be needed to avoid these conflicts. Land use impacts would be similar with this alternative and the Project.

10. Noise and Vibration

Under Alternative 2, the Project would not be built. No demolition or construction activities which would produce noise or groundborne vibration impacts would occur, except along the public right-of-way where BRT-only lanes and bus stops are located. As such, construction noise and vibration impacts would be reduced. Though this alternative would reduce VMT, it would only be able to provide approximately 20 percent of the ridership capacity compared to the Project. Alternative 2 would reduce traffic volumes along key roadway corridors and VMT on an average weekday basis to a lesser degree than the Project. Specifically, typical weekday nonevent and daily VMT in the City would be reduced by an amount equivalent to 20 percent to 25 percent of those of the Project. With the Project, operation of the ATS trains would result in noise levels increases from a low of 0.1 dBA to a high of 1.8 dBA, and operation of the MSF would result in noise increases ranging from no increase to a high of 3.9 dBA. Under Alternative 2, the ATS would not be built or operate, and these noise increases would not occur. However, increased bus traffic on these roadways would increase the local noise levels and, as such, noise and vibration impacts associated with operation of Alternative 2 would be similar to the Project.

11. Population, Employment, and Housing

The Project would have no direct impact on housing as the Project does not include the construction or demolition of any housing units. The Project would impact existing employment opportunities in the City as commercial uses that would be displaced by the Project are estimated to be approximately 464 jobs.

However, the Project would result in a net increase of approximately 11,052[9] FTE jobs, as estimated by the Job Co-Benefits calculation (see **Section 4.11 Population, Employment, and Housing**). The number of jobs that will be supported by the Project in the region is within the projected regional trends in the SCAG 2020-2045 RTP/SCS data and the jobs that will benefit from the Project will not directly translate into additional population growth in the region. As such, the Project would have a less than significant impact on inducing employment and population growth.

Alternative 2 would maintain the existing population and housing trends within the City and the region while having a minor impact on employment by hiring personnel for the BRT System construction and operation. As such, Alternative 2 would not significantly impact population or employment growth in the City or the region. As such, Alternative 2 would have similar impacts on population and housing conditions, although the beneficial effects of this alternative would be substantially reduced as compared to the Project.

12. Transportation

Under Alternative 2, the City would construct and operate a BRT system that would connect the LASED, including the Performance Arena, other mixed uses in the Hollywood Park Specific Plan area, SoFi Stadium, the Forum, and the IBEC to the K Line Downtown Inglewood station. Under this alternative, the Project would not be built. No demolition or construction activities would occur, except along the public right-of-way where BRT-only lanes and bus stops along the route would be located. As such, Alternative 2 would reduce impacts associated with the construction of transportation facilities.

One to two roadway lanes would be lost to mixed traffic flow along the BRT alternative route depending upon location. With a maximum potential headway of approximately 3 minutes at peak times, Alternative 2 would only be able to provide approximately 20 percent of the capacity compared to the Project. The plan amendments included in the Project would not occur. The area would continue to be used by the existing commercial, recreational, and other uses.

Alternative 2 would provide operational benefits by reducing traffic volumes along key roadway corridors and VMT on an average weekday basis to a lesser degree than the Project. Specifically, typical weekday nonevent and daily VMT in the City would be reduced by an amount equivalent to 20 percent to 25 percent of those of the Project. The estimated daily BRT ridership with Event Conditions would be approximately 20 percent of the projected Project ridership. Sufficient transit connection capacity between the Metro's regional transit system and the City's new major activity centers and entertainment venues would not be provided by this alternative. Additionally, this alternative would reduce the roadway capacities along

9 11,516 minus 464 in numbers of jobs displaced.

Florence Avenue, Prairie Avenue, Manchester Boulevard, and Market Street, consequently increasing traffic congestion areawide. In comparison, the Project would not reduce roadway capacities compared to existing conditions and would improve congestion and traffic flows areawide. As such, Alternative 2 would obtain limited operational benefits while substantially worsening traffic flows and congestion Transportation impacts of Alternative 2 would be increased as compared to the Project.

13. Tribal Cultural Resources

The Project would have a less than significant impact on Tribal Cultural Resources (TCRs), No TCRs were identified in the records around the Project site and no sensitive resources were identified. Nonetheless, the Project would include construction which would have the potential to unearth subsurface resources not previously identified. Given the level of urban development in Inglewood, the likelihood of unearthing TCRs is low but it is still a possibility. Alternative 2 would eliminate the need to construct the ATS and this potential impact to TCRs would be avoided. TCR impacts for Alternative 2 would be reduced as compared to the Project.

14. Utilities and Service Systems

Under Alternative 2, the Project would not be built. No demolition or construction activities would occur, except along the public right-of-way where BRT-only lanes and bus stops along the route are located. As such, no utility lines would need to be removed or relocated along Market Street, Manchester Boulevard, or Prairie Avenue, which would reduce construction impacts.

Once operational, the Project and Alternative 2 would not require further utility upgrades or relocation of utility infrastructure, except for potential electric charging infrastructure. However, as discussed previously, operation of the Project would consume a maximum net increase of 23.85 million kWh of electricity per year. Alternative 2 would reduce operational electricity demands in comparison to the Project. However, operation of the Project would result in a net decrease of 3.61 million kBTU of natural gas per year, and a net decrease of 71.86 acre feet per year of water per year. Alternative 2 would not result in similar reductions in utility demands.

Basis for Finding

Alternative 2 would avoid or lessen some of the impacts associated with the Project. However, it would also reduce the roadway capacities along Florence Avenue, Prairie Avenue, Manchester Boulevard, and Market Street, consequently increasing traffic congestion throughout the City. Moreover, this Alternative would not reduce VMT's to the same capacity as the Project. All of these reasons provide sufficient independent grounds for rejecting this alternative.

Finding

Specific economic, legal, social, technological, or other considerations, make Alternative 2 infeasible.

Alternative 3: Market Street Pedestrian Promenade

Description

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

Relationship to Project Objectives

The Market Street Pedestrian Promenade Alternative would meet most of the City's objectives for the Project since the Project would still be built, and reductions to daily traffic volumes along key roadway corridors and reductions to VMTs on an average weekday basis with event would occur similar in magnitude to those associated with the Project. However, Alternative 3 would not meet the City's objective to maintain existing roadway capacity along Market Street.

Comparative Impacts

Table 5.0-1 at the beginning of Chapter 5.0, Alternatives, of the Recirculated Draft EIR, provides an impact-by-impact comparison of the significant impacts of the Project and Alternative 3.

1. Aesthetics

With this alternative, the Project and all of its components would be constructed and operate, but Market Street between Florence Avenue and Manchester Boulevard would be closed to vehicular traffic. Alternative 3 would require the placement of barricades to prevent vehicle access. These barricades would need to be designed in a manner which would not degrade the existing visual character of Downtown. As the ATS system as would be constructed with this alternative, the aesthetic impacts of the Project would be similar to the Project.

2. Air Quality

Construction under Alternative 3 would be similar to the Project. During construction, the Project would not exceed the significance threshold for any criteria pollutant after mitigation, and impacts would be less than significant. Therefore, similar to the Project, Alternative 3 would not conflict with implementation of the applicable air quality plans and would not exceed thresholds established by the SCAQMD for criteria air pollutants.

Operational impacts associated with Alternative 3 would be similar to the Project as the Pedestrian Promenade would not generate additional air quality emissions. Moreover, reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis with event would occur similar in magnitude to those associated with the Project. As such, Alternative 3 would result in similar operational impacts compared to the Project.

3. Biological Resources

Approximately 502 trees along the Project alignment may require removal during construction of the Project. The addition of a Pedestrian Promenade would not require tree removals and would likely include the planting of additional trees. As such, impacts to biological resources during construction would be reduced compared to the Project. Alternative 3 would not diminish the chances for long-term survival of bird species or their habitats and no additional tree and/or ornamental vegetation removals would be required. As such, Alternative 3 would result in similar operational impacts compared to the Project.

4. Cultural Resources

Closing a portion of Market Street in downtown Inglewood to vehicle use, which would occur with Alternative 3, would not result in a significant impacts to historic resources located on Market Street. Conversion of this portion of Market Street to a pedestrian mall would not result in any additional direct or indirect impacts to historic or other cultural resource impacts compared to the Project, nor would it substantially reduce the cultural resources impacts of the Project. Neither this alternative nor the Project would result in significant impacts to cultural resources.

5. Energy Resources

Energy demand from construction activities under Alternative 3 would be similar to the Project, as the ATS system would be built as proposed. The additional construction required to create the pedestrian mall would only increase these impacts incrementally. Reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis would occur similar in magnitude to those associated with the Project. As such, Alternative 3 would result in similar operational impacts compared to the Project.

6. Geology and Soils

Under Alternative 3, the Project would be built but would include a pedestrian promenade on Market Street between Florence Avenue and Manchester Boulevard. Impacts related to geology and soils conditions, including paleontological resources, would be similar to those identified for the Project. Geology and soils conditions that would be encountered in construction of Alternative 3 would be the same as with the Project. The Potrero Fault lies approximately one-quarter mile to the east of the project study area; however, compliance with the California Building Code would avoid the creation of seismic hazards. Ground-disturbing activity and the potential for accidental discovery of paleontological resources would continue to be potentially significant with Alternative 3. Alternative 3 would implement similar measures as the Project to mitigate the potential impacts on paleontological resources to less than significant.

7. Greenhouse Gas Emissions

Construction under Alternative 3 would be similar to the Project and would result in a similar level of GHG emissions. Reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis would occur similar in magnitude to those associated with the Project. Therefore, similar to the Project, Alternative 3 would be consistent with the CARB 2017 Scoping Plan Update, SCAG's 2020-2045 RTP/SCS, the ECAP, and General Plan, which set goals to reduce GHG emissions by increasing energy efficiency and improving transit infrastructure. Operational GHG impacts would be similar to the Project.

8. Hazards and Hazardous Materials

Under Alternative 3, the Project would be built but would include the pedestrian promenade. Construction under Alternative 3 would be similar to the Project. Construction of the guideway and stations in conjunction with the MSF and PDS substations would involve the demolition of existing buildings, which may have the potential to release hazardous materials, such as ACMs, LBP, and other potentially hazardous building materials. The additional construction activities required to create the pedestrian promenade would be minor. Similar to the Project, construction activities under Alternative 3 would likely cause the temporary closure of travel lanes, roadways segments, and sidewalks along the elevated guideway and stations within the street rights-of-way.

Under Alternative 3, operation of the ATS would include the use and storage of hazardous materials typical of those used in an industrial setting, similar to the Project. Alternative 3 would not interfere with or impair the City's ability to increase public awareness or make any improvements to emergency services and warning systems during operation. Converting this portion of Market Street to a pedestrian

promenade would not involve the use of handling of any hazardous materials. With adherence to the federal, State, and local safety requirements, Alternative 3 would not conflict with the requirements of an emergency response plan or emergency evacuation plan, similar to the Project. As such, operational impacts under Alternative 3 would be similar to the Project.

9. Land Use and Planning

Alternative 3 would modify existing traffic patterns and connections within the community. Vehicular connections would be reduced as Market Street between Florence Avenue and Manchester Boulevard would be closed. Vehicular traffic would need to be rerouted around the closed pedestrian promenade which may increase local traffic volume for adjacent streets. The connection between different parts of the community would not be diminished in a substantial manner as the street segment that would be closed only includes three blocks. Alternative 3 would not, therefore, divide the community physically, but may contribute to additional ground level traffic surrounding the closure.

Alternative 3 would be generally consistent with all existing goals, plans, and policies, as it would maintain the majority of the infrastructure in the surrounding community, allowing the goals and objectives of the existing plans to be carried out generally. Additionally, closure of Market Street would enable the activation and programming of Market Street, which could include open air markets, creative retail and concession spaces, recreational and open space areas, locations for public art, and locations for public gathering. This Alternative could achieve City's objective for economic development of Market Street. Conflicts with the design of existing roadways, roadway capacity, and the City's circulation element may exist and appropriate design and amendments for City documents would be needed to avoid conflicts with existing plans and policies. The land use impacts of this alternative and the Project would be similar and less than significant.

10. Noise and Vibration

Construction under Alternative 3 would be similar to the Project. It is anticipated that the development of a Pedestrian Promenade along Market Street would not result in substantial noise or vibration impacts, as it would eliminate vehicle travel along Market Street between Florence Avenue and Manchester Boulevard, which would reduce roadway noise. Moreover, reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis with event would occur similar in magnitude to those associated with the Project. The operational impacts of the Project would be less than significant. As such, operational noise and vibration impacts would be reduced in comparison to the Project.

11. Population, Employment, and Housing

The Project would have no direct impact on housing as the Project does not include the construction or demolition of housing units. The Project would impact existing employment opportunities in the City as commercial uses that would be displaced by the Project are estimated to be approximately 464 jobs. However, the Project would result in a net increase of approximately 11,052[10] FTE jobs through the Greenhouse Gas Reduction Funds, as estimated by the Job Co-Benefits calculation (see **Section 4.11 Population, Employment, and Housing**). The number of jobs that will be supported by the Project in the region is within the projected regional trends in the SCAG 2020-2045 RTP/SCS data and the jobs that will benefit from the Project will not directly translate into additional population growth in the region. As such the Project would have a less than significant impact on inducing employment and population growth.

Converting a portion of Market Street to a pedestrian mall would not result in any additional direct or indirect impacts to population, employment, and housing. Alternative 3 would maintain the existing population, employment, and housing trends within the City and the region. As such, Alternative 3 would not directly or indirectly substantially induce population in the City or the region. Employment support and would be similar to the Project under Alternative 3.

12. Transportation

Construction under Alternative 3 would be similar to the Project. The Project and all of its components would be constructed and operational. Market Street between Florence Avenue and Manchester Boulevard would be reconfigured to eliminate vehicular traffic north and south on Market Street. Cross traffic would be allowed on Regent Street and Queen Street without any turns to/from Market Street. The closure of Market Street would divert traffic to the surrounding streets including La Brea Avenue and Locust Street. Since the current traffic along Market Street is very low, this diversion of Market Street traffic can be accommodated along adjacent parallel streets. The operation of the ATS would be the same as planned for the Project.

Similar to the Project, Alternative 3 would result in operational benefits. Reductions to daily traffic volumes along key roadway corridors and reductions to VMTs on an average weekday basis would occur similar in magnitude to those associated with the Project. Additionally, this alternative is estimated to result in transit ridership similar to the Project. Finally, Alternative 3 would provide similar operational benefits as those of the Project relative to reduction in traffic congestion and improvement of traffic flows along key roadway facilities areawide.

10 11,516 minus 464 in numbers of jobs displaced.

13. Tribal Cultural Resources

The Project would have a less than significant impact on Tribal Cultural Resources (TCRs), No TCRs were identified in the records around the Project site and no sensitive resources were identified. Nonetheless, the Project would include construction which would have the potential to unearth subsurface resources not previously identified. Given the level of urban development in Inglewood, the likelihood of unearthing TCRs is low but it is still a possibility. Converting a portion of Market Street to a pedestrian promenade would not result in any additional impacts.

14. Utilities and Service Systems

Construction and operation under Alternative 3 would be similar to the Project. Closing a portion of Market Street to vehicle traffic would only involve minor above ground street improvements. For this reason, impacts related to the construction or relocation of water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities would be similar compared to the Project.

Basis for Finding

Alternative 3 would not reduce operational impacts and would result in similar overall impacts compared to the Project. Moreover, this Alternative would result in reductions to daily traffic volumes along key roadway corridors and reductions to VMTs on an average weekday basis with event in magnitude to those associated with the Project. However, Alternative 3 would not meet the City's objective to maintain existing roadway capacity along Market Street, as it directly involves entirely closing off a portion of roadway to vehicular traffic. The Project, on the other hand, would satisfy this objective as it involves no change to roadway capacity. (See DEIR, p. 4.12-35.) This provides sufficient independent grounds for rejecting this alternative.

Finding

Specific economic, legal, social, technological, or other considerations, make Alternative 3 infeasible.

Alternative 4: 4th Station Alternatives

Description

This alternative considers the addition of a fourth station to the ATS as proposed at Manchester Boulevard, east of the Market Street/Manchester Boulevard intersection.

The station configuration would consist of a center platform with vertical circulation to an elevated passenger walkway located under the station platform level. Passengers would have access to the station

through an elevated passenger walkway. As with the other ITC stations, this additional station would consist of a center platform configuration with the platform located at level 3 (approximately 50 feet above the existing grade). Passengers would access the platform from a mezzanine (at level 2) connected by elevated passenger walkways to vertical circulation elements to provide access to the sidewalk (at level 1) on the north side of Manchester Boulevard. Providing this additional station in Downtown would:

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

Relationship to Project Objectives

The 4th Station Alternative would meet all of the City's objectives for the Project since the Project would still be built and reductions to daily traffic volumes along key roadway corridors and reductions to VMTs on an average weekday basis with event would occur similar in magnitude to those associated with the Project.

Comparative Impacts

Table 5.0-1 at the beginning of Chapter 5.0, Alternatives, of the Recirculated Draft EIR, provides an impact-by-impact comparison of the significant impacts of the Project and Alternative 4.

1. Aesthetics

Under the 4th station alternative, impacts to visual character under aesthetics would be similar to the Project. The Project would not result in significant impacts to the aesthetic character of the community during construction or operation with implementation of the project design features in the CCP and Design Guidelines. The addition of a 4th station east of the intersection of Market Street and Manchester Boulevard would not result in any additional visual impacts as this station would be integrated into the design of the ATS consistent with the Design Guidelines.

2. Air Quality

Under Alternative 4, the Project would be built but would include an additional station along Manchester Boulevard. During construction, the Project would not exceed the significance threshold for any criteria pollutant after mitigation, and impacts would be less than significant. The construction of a 4th station

would require additional construction activities including operation of off-road heavy-duty equipment and on-road trucks for hauling which would increase air quality emissions. Though Alternative 4 would implement similar mitigation measures as the Project, it would increase construction impacts.

Operation of the ATS with a 4th station would not result in any additional operational air quality emissions. Operational air quality impacts would be similar with this alternative and the Project.

3. Biological Resources

Approximately 502 trees are located along the proposed ATS alignment that may require removal during construction of the Project Project. The 4th station would be located along the guideway within the public right-of-way along Manchester Boulevard. With Alternative 4, no additional properties would need to be acquired and no additional demolition of buildings or site improvements would be required. Alternative 4 would not require an increase in tree removals or disturbance of nesting raptors or migratory birds. For this reason, impacts to biological resources during construction would be similar compared to the Project Project. Moreover, operation of Alternative 4 would not diminish the chances for long-term survival of bird species or their habitats and no additional tree and/or ornamental vegetation removals would be planned. As such, Alternative 4 would result in similar operational impacts compared to the Project.

4. Cultural Resources

Alternative 4 would have impacts on cultural resources similar to the Project. Alternative 4 would construct the ATS guideway on the same alignment with the same dimensions as the Project. The additional station would not result in any additional impacts because the additional station and this segment of the guideway would be constructed above the nearby historic resource, the Bank of America building at 320 Manchester Boulevard. The Bank of America building would retain its ability to convey its historical significance without additional indirect impact to the view of its primary façade. As such impacts to cultural resources would be similar for Alternative 4 and the Project.

5. Energy Resources

Under Alternative 4, the Project would be built but would include an additional station along Manchester Boulevard. Construction of a 4th station would result in an incremental increase in energy resource consumption for electricity and petroleum-based fuels for construction of this station. However, this increase would be minimal and temporary, similar to the Project. Nonetheless construction impacts to energy resources would increase incrementally compared to the Project.

Operation of a 4th station would increase consumption of energy resources including electricity and natural gas. This alternative would result in reductions to daily traffic volumes along key roadway corridors

and VMT on an average weekday basis would occur similar in magnitude to those estimated for the Project, although the addition of a 4th station could incrementally increase ridership. As such, this alternative would result in a reduction of petroleum-based fuel consumption from vehicle travel similar or to a slightly greater degree than the Project. The addition of one station would not increase energy resource consumption to a level of significance.

6. Geology and Soils

Under Alternative 4, the Project would be built but would include an additional station along Manchester Boulevard. Impacts related to geology and soils conditions, including paleontological resources, and potential conflict with an emergency evacuation plan, would be similar to those described for the Project. Geology and soils conditions that would be encountered in construction of Alternative 4 would be the same as with the Project. The Potrero Fault lies approximately one-quarter mile to the east of the project study area; however, compliance with the California Building Code would avoid the creation of seismic hazards. Ground-disturbing activity and the potential for accidental discovery of paleontological resources would continue to be potentially significant under Alternative 4. Alternative 4 would implement similar measures as the Project to mitigate the potential impacts on paleontological resources to less than significant.

7. Greenhouse Gas Emissions

Under Alternative 4, the Project would be built but would include an additional station along Manchester Boulevard. Construction of a 4th station would require additional construction activities including operation of off-road heavy-duty equipment and on-road trucks for hauling which would increase GHG emissions. However, similar to the Project, these emissions would be temporary in nature and cease once the Project is complete. Nonetheless, construction related GHG emissions would increase under Alternative 4.

Operation of a 4th station would incrementally increase operational GHG emissions. However, this alternative would result in reductions to daily traffic volumes along key roadway corridors and VMT on an average weekday basis would occur similar in magnitude to those estimated for the Project. As such, this alternative would result in a net negative GHG emissions associated with vehicle travel. The addition of one station would not increase operational GHG emissions to a level of significance. Moreover, similar to the Project, Alternative 4 would be consistent with the CARB 2017 Scoping Plan Update, SCAG 2020-2045 RTP/SCS, the ECAP, and General Plan, which set goals to reduce GHG emissions by increasing energy efficiency and improving transit infrastructure. Nonetheless, operational GHG emissions would increase incrementally with Alternative 4.

8. Hazards and Hazardous Materials

Under Alternative 4, the Project would be built but would include an additional station along Manchester Boulevard. Although construction of an additional station would increase construction activities compared to the Project, construction impacts under Alternative 4 would be similar to those of Project. Construction of the guideway and four stations in conjunction with the MSF and PDS substations would still involve the demolition of existing buildings, which may have the potential to release hazardous materials, such as ACMs, LBP, and other potentially hazardous building materials. Furthermore, excavations of potentially contaminated soils may occur during construction of Alternative 4 as a result of prior uses on some of the sites, similar to the Project.

Under Alternative 4, operation would include the use and storage of hazardous materials typical of those used in an industrial setting, similar to the Project. Alternative 4 would not interfere with or impair the City's ability to increase public awareness or make any improvements to emergency services and warning systems during operation. With adherence to the federal, State, and local safety requirements, Alternative 4 would not conflict with the requirements of an emergency response plan or emergency evacuation plan, similar to the Project. As such, operational impacts under Alternative 4 would be similar when compared to the Project.

9. Land Use and Planning

Alternative 4 would build an ATS similar to the Project with a 4th station located on Manchester Boulevard. The Project would not physically divide the community with its elevated guideways and maintenance of existing roadway capacity and roadway connections. Alternative 4 would have an alignment and elevated guideways similar to the Project. As such, Alternative 4 would also maintain the existing roadway capacity and roadway connections. Alternative 4 could activate foot traffic and interest on Market Street and help reinvigorate the Downtown business area. Alternative 4 will have a similar impact on physically dividing the community as the Project.

Alternative 4 would be generally consistent with the existing plans, policies and guidelines in the City and the greater region. Alternative 4 would require the same amendments to the Land Use Element, Circulation Element, Safety Element, Environmental Justice Element, and the Inglewood Municipal Code as the Project to incorporate the ATS into the language of the existing plans, policies, and guidelines within the City. As such, land use impacts of Alternative 4 would be similar to the Project with neither this alternative nor the Project resulting in significant land use impacts.

10. Noise and Vibration

Under Alternative 4, the Project would be built but would include an additional station along Manchester Boulevard. Construction of a 4th station would require additional construction activities including operation of off-road heavy-duty equipment and on-road trucks for hauling which could increase construction noise and vibration levels. Though Alternative 4 would implement similar mitigation measures as the Project, it would increase construction noise and vibration impacts.

Alternative 4 would result in reductions to daily traffic volumes along key roadway corridors and VMT on an average weekday basis would occur similar or slightly increased in magnitude to those estimated for the Project. As such, this alternative would result in similar or slightly increased roadway noise levels as the Project. The addition of one station would not increase operational noise or vibration levels to a level of significance.

11. Population, Employment, and Housing

The Project would have no direct impact on housing as the Project does not include the construction or demolition of any housing units. The Project would impact existing employment opportunities in the City as commercial uses that would be displaced by the Project are estimated to be approximately 464 jobs. However, the Project would result in a net increase of for approximately 11,052[11]FTE jobs as estimated by the Job Co-Benefits calculation (see **Section 4.11 Population, Employment, and Housing** of the Recirculated Draft EIR). The number of jobs that will be supported by the Project in the region is within the projected regional trends in the SCAG 2020-2045 RTP/SCS data and the jobs that will benefit from the Project will not directly translate into additional population growth in the region. As such the Project would have a less than significant impact on inducing employment and population growth.

Alternative 4 would have a similar effect on the population and employment trend as the ATS would be constructed and the same displacement of jobs and hiring of ATS personnel would occur. As such, Alternative 4 would have similar population, employment, and housing impacts as the Project.

12. Transportation

Under Alternative 4, the Project would be built but would include an additional station along Manchester Boulevard. Construction of a 4th station would require additional construction activities including operation of off-road heavy-duty equipment and on-road trucks for hauling which could increase transportation effects and disruptions.

The weekday daily VMT would be reduced in the Future Opening Year (2027) with Event conditions similar to the VMT reductions estimated for the Project. The estimated daily ITC ridership during Future Opening

11 11,516 minus 464 in numbers of jobs displaced.

Year (2027) with NFL Event conditions are estimated to be approximately 29,300 passengers similar to the Project. The weekday daily VMT would be reduced in the Future Horizon Year (2045) with Event conditions similar to the VMT reductions estimated for the Project. The estimated daily ITC ridership during Future Horizon Year (2045) with an NFL Event conditions are estimated to be approximately 34,650 passengers, similar to the Project. Additionally, daily traffic volumes would decrease along key travel corridors such as Prairie Avenue, Manchester Boulevard and Century Boulevard, thereby reducing congestion and improving travel conditions on a system-wide basis.

Similar to the Project, Alternative 4 would result in operational benefits. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur similar in magnitude to those estimated for the Project. This alternative is estimated to result in ITC ridership similar to the Project. Improved traffic flows and reduction in congestion along key travel corridors, similar to those associated with the Project would occur with Alternative 4.

13. Tribal Cultural Resources

The Project would have a less than significant impact on Tribal Cultural Resources (TCRs). No TCRs were identified in the records around the Project site and no sensitive resources were identified. Nonetheless, the Project as proposed would include construction which would have the potential to unearth subsurface resources not previously identified. Given the level of urban development in Inglewood, the likelihood of unearthing TCRs is low but it is still a possibility. The 4th station alternative would have a similar impact to TCRs as the Project since extensive construction and excavation of soil would be required to construct the ATS structure and the 4th station. Similar impacts to the TCRs would result from the Project and Alternative 4.

14. Utilities and Service Systems

The 4th station would be located along the guideway within the public right-of-way along Manchester Boulevard. Under Alternative 4, no additional properties would need to be acquired and no additional demolition of buildings and site improvements would be required. As such impacts related to the construction or relocation of water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities would be similar to the Project.

Basis for Finding

Alternative 4 would meet all of the City's objectives for the Project and would reduce VMTs in a similar magnitude to the Project, but would provide little benefit to ridership. The area of the additional stop under this Alternative is already sufficiently serviced by existing public bus stops. Moreover, Alternative 4

would result in increased construction and operational impacts compared to the Project. Alternative 4 would also be substantially more expensive than the Project. This provides sufficient independent grounds for rejecting this alternative.

Finding

Specific economic, legal, social, technological, or other considerations, make Alternative 4 infeasible.

Alternative 5: Prairie Avenue Single Station Alternative

Description

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

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

Relationship to Project Objectives

Alternative 5 would meet, or partially meet, most of the City's objectives for the Project. Alternative 5 would reduce the City's traffic congestion and alleviate growing demand on the existing roadway network, although to a slightly lesser degree than the Project. Specifically, the Prairie Avenue Single Station Alternative would result in a reduction in capacities along Prairie Avenue, and traffic flow and congestion on a system-wide basis would be increased compared to those estimated for the Project. However, several of the City's objectives would be met to the same extent as under the Project. For example, be eliminating one of the stations, Alternative 5 would not meet the objective of encouraging intermodal transportation systems by providing convenient, reliable time-certain transit to the same degree as would the Project. Eliminating a station would also not meet the objective of providing convenient access to businesses, and to connect the City by providing transit within safe and accessible walking distances to the same degree as would the Project.

Comparative Impacts

Table 5.0-1 at the beginning of Chapter 5.0, Alternatives, of the Recirculated Draft EIR, provides an impact-by-impact comparison of the significant impacts of the Project and Alternative 5.

1. Aesthetics

Under Alternative 5, the Project would not result in significant impacts to the aesthetic character of the community during construction or operation with implementation of the project design features in the ITC CCP and Design Guidelines. Similarly, Alternative 5 would travel down the same alignment with the same proposed and elevated guideway across the frontage of the buildings on Market Street. No additional impacts on the visual character of downtown would result from the consolidation and relocation of the single station along Prairie Avenue.

2. Air Quality

Under Alternative 5, the Project would be built but the two proposed stations along Prairie Avenue would be consolidated into a single station that would be located adjacent to the City's Civic Center site. The construction of a single station along Prairie Avenue instead of two stations would result in less construction activities compared to the Project. Similar to the Project, Alternative 5 would not conflict with implementation of the applicable air quality plans or exceed thresholds established by the SCAQMD for criteria air pollutants. Moreover, Alternative 5 would implement similar mitigation measures as the Project and would reduce construction air quality emissions.

Operation of a single station along Prairie Avenue instead of two stations would slightly decrease operational air quality emissions. However, under Alternative 5, mobile operational benefits would be less than those associated with the Project. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur, but approximately 15 percent less in magnitude than those associated with the Project. As such, operational air quality emissions associated mobile sources would increase compared to the Project.

3. Biological Resources

Approximately 502 trees which may require removal during construction of the Project exist along the Project alignment. With Alternative 5, no additional properties would need to be acquired and no additional demolition of buildings or site improvements would be required. The guideway would still be constructed along the same segment of Prairie Avenue compared to the Project. As such, Alternative 5 would not require an increase or decrease in tree removals or disturbance of nesting raptors or migratory birds. As such, impacts to biological resources during construction would be similar compared to the

Project. Similar to the Project, operation of Alternative 5 would not diminish the chances for long-term survival of bird species or their habitats and no additional tree and/or ornamental vegetation removals would be planned. As such, Alternative 5 would result in similar operational impacts compared to the Project.

4. Cultural Resources

Alternative 5 would have a less than significant impact on cultural resources, similar to the Project. The consolidated and relocated station on Prairie Avenue would have no impact and would not be located near any identified historical resources. As such, impacts to cultural resources would be similar for Alternative 5 and the Project.

5. Energy Resources

Under Alternative 5, the Project would be built but the two proposed stations along Prairie Avenue would be consolidated into a single station that would be located adjacent to the City's Civic Center site. Construction of a single station in place of two stations would result in an incremental decrease of energy resource consumption for electricity and petroleum-based fuels associated with operation of the station.

Operation of a single station along Prairie Avenue instead of two stations would also slightly decrease operational energy resource consumption. However, under Alternative 5, mobile operational benefits would be less than those associated with the Project. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur, but approximately 15 percent less in magnitude than those associated with the Project. As such, Alternative 5 would result in an increase in petroleum-based fuel consumption compared to the Project.

6. Geology and Soils

Under Alternative 5, the Project would be built but the two proposed stations along Prairie Avenue would be consolidated into a single station that would be located adjacent to the City's Civic Center site. Impacts related to geology and soils conditions, including paleontological resources, and potential to conflict with an emergency evacuation plan, would be similar to those described for the Project. Geology and soils conditions that would be encountered in construction of Alternative 5 would be the same as with the Project. The Potrero Fault lies approximately one-quarter mile to the east of the project study area; however, compliance with the California Building Code would avoid the creation of seismic hazards. Ground-disturbing activity and the potential for accidental discovery of paleontological resources would continue to be potentially significant under Alternative 5 and would require the same mitigation measures as identified for the Project in order to reduce the impact to less than significant.

7. Greenhouse Gas Emissions

The construction of a single station along Prairie Avenue instead of two stations would result in a reduction in the level of construction activities compared to the Project. As such Alternative 5 would reduce construction related GHG emissions.

Operation of a single station along Prairie Avenue instead of two stations would also slightly decrease GHG emissions resulting from operation of the stations. However, under Alternative 5, mobile operational benefits would be less than those associated with the Project. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur, but approximately 15 percent less in magnitude than those associated with the Project. However, similar to the Project, Alternative 5 would be consistent with the CARB 2017 Scoping Plan Update, SCAG 2020-2045 RTP/SCS, the ECAP, and General Plan, which set goals to reduce GHG emissions by increasing energy efficiency and improving transit infrastructure. Nonetheless, operational GHG emissions associated mobile sources would increase compared to the Project.

8. Hazards and Hazardous Materials

While construction of a single station along Prairie Avenue instead of two stations would result in a reduction in the level of construction activities compared to the Project, construction impacts under Alternative 5 would be similar to those of the Project. Construction of the guideway and stations in conjunction with the MSF and PDS substations would still involve the demolition of existing buildings, which may have the potential to release hazardous materials, such as ACMs, LBP, and other potentially hazardous building materials. Furthermore, excavations of potentially contaminated soils may occur during construction of Alternative 5 as a result of prior uses on some of the sites, similar to the Project. Similar to the Project, construction activities under Alternative 5 would likely cause the temporary closure of travel lanes, roadways segments, and sidewalks along the elevated guideway and stations within the street rights-of-way.

Under Alternative 5, operation would include the use and storage of hazardous materials typical of those used in an industrial setting, similar to the Project. Alternative 5 would not interfere with or impair the City's ability to increase public awareness or make any improvements to emergency services and warning systems during operation. With adherence to the federal, State, and local safety requirements, Alternative 5 would not conflict with the requirements of an emergency response plan or emergency evacuation plan, similar to the Project. As such, operational impacts under Alternative 4 would be similar when compared to the Project.

9. Land Use and Planning

Alternative 5 would involve building and operating an ATS system similar to the Project while consolidating the two proposed stations on Prairie Avenue to one single station adjacent to the Civic Center Site on Prairie Avenue. The Project would not physically divide the community with its elevated guideways and maintenance of existing roadway capacity and roadway connections. Alternative 5 would have a similar alignment and elevated guideways similar to the Project. As such, Alternative 5 would also maintain the existing roadway capacity and roadway connections. Alternative 5 would have a similar impact on physically dividing the community as the Project.

Alternative 5 would be generally consistent with the existing plans, policies and guidelines in the City and the greater region. Alternative 5 would include the same amendments to the Land Use Element, Circulation Element, Safety Element, Environmental Justice Element, and the Inglewood Municipal Code as the Project to incorporate the ATS into the language of the existing plans, policies, and guidelines within the City. As such, the policy consistency impacts of Alternative 5 would be similar to the Project.

10. Noise and Vibration

The construction of a single station along Prairie Avenue instead of two stations would result in a reduction in the level of construction activities compared to the Project. For this reason, Alternative 5 would reduce construction related noise and vibration levels.

Operation of a single station along Prairie Avenue instead of two stations would also slightly decrease operational noise and vibration levels. However, under Alternative 5, mobile operational benefits would be less than those associated with the Project. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur, but approximately 15 percent less in magnitude than those associated with the Project. As such, operational noise and vibration impacts associated mobile sources would increase compared to the Project.

11. Population, Employment, and Housing

The Project would have no direct impact on housing as the Project does not include the construction or demolition of any housing units. The Project would impact existing employment opportunities in the City as commercial uses that would be displaced by the Project are estimated to be approximately 464 jobs. However, the Project would result in a net increase of for approximately 11,052[12]FTE jobs through the Greenhouse Gas Reduction Funds, as estimated by the Job Co-Benefits calculation (see **Section 4.11 Population, Employment, and Housing**). The number of jobs that will be supported by the Project in the

12 11,516 minus 464 in numbers of jobs displaced.

region is within the projected regional trends in the SCAG 2020-2045 RTP/SCS data and the jobs that will benefit from the Project will not directly translate into additional population growth in the region. As such the Project would have a less than significant impact on inducing employment and population growth.

Alternative 5 would have a similar effect on the population and employment trend as the ATS would be constructed as planned. Alternative 5 would have a similar impact to the population, employment, and housing resource as compared to the Project.

12. Transportation

Under Alternative 5, the Project would be built but the two proposed stations along Prairie Avenue would be consolidated into a single station that would be located adjacent to the City's Civic Center site. The Project modifies and relocates Prairie Avenue to the east to maintain the current roadway capacity. This relocation in conjunction with the need for a passenger station connection to the sidewalk/ground level affects properties located east of Prairie Avenue. Alternative 5 avoids affecting these properties by consolidating the two proposed stations along Prairie Avenue into a single station that would be located adjacent to the Intermodal Transit Facility at the City's Civic Center site. This alternative maintains Prairie Avenue within its existing right-of-way; however, one to two lanes would be lost reducing the capacity of the roadway. Specifically, one travel lane in each direction along the Prairie Avenue roadway between Arbor Vitae and La Palma, one lane in the southbound direction between La Palma and Pincay Drive, and one lane in each direction between Pincay Drive and Manchester Boulevard would be lost under Alternative 5.

Under Alternative 5, operational benefits would be less than those associated with the Project. Reductions to daily traffic volumes along key roadway corridors and VMTs on an average weekday basis would occur, but approximately 15 percent less in magnitude than those associated with the Project. Alternative 5 is estimated to result in transit ridership equivalent to approximately 75 percent of the transit ridership associated with the Project. However, due to a reduction in capacities along Prairie Avenue, traffic flow and congestion in the surrounding area would be worse under Alternative 5 compared to the Project.

13. Tribal Cultural Resources

The Project would have a less than significant impact on Tribal Cultural Resources (TCRs), No TCRS were identified in the records around the Project site and no sensitive resources were identified. Nonetheless, the Project as proposed would include construction which would have the potential to unearth subsurface resources not previously identified. Given the level of urban development in Inglewood, the likelihood of unearthing TCRs is low but it is still a possibility. Alternative 5 would result in similar potential impacts to TCRs as the Project since excavation of soil would be required to construct the ATS system along the

proposed alignment, including a single station on Prairie Avenue. Similar impacts to the TCRs are anticipated for the Project and Alternative 5.

14. Utilities and Service Systems

The proposed Prairie station under Alterative 5 would be located within the City's Civic Center site. The guideway would still be constructed along the same segment of Prairie Avenue compared to the Project. As such, impacts related to the construction or relocation of water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities would be similar compared to the Project.

Basis for Finding

Alternative 5 would result in similar impacts compared to the Project. Alternative 5 would reduce the City's traffic congestion and alleviate growing demand on the existing roadway network, although to a slightly lesser degree than the Project. Moreover, Alternative 5 would not meet the objective of encouraging intermodal transportation systems by providing convenient, reliable time-certain transit to the same degree as would the Project. Eliminating a station would also not meet the objective of providing convenient access to businesses, and to connect the City by providing transit within safe and accessible walking distances to the same degree as would the Project. Alternative 5 would also not meet the goal of maintaining roadway capacity because it will reduce eliminate one to two lanes on Prairie Avenue. This provides sufficient independent grounds for rejecting this alternative.

Finding

Specific economic, legal, social, technological, or other considerations, make Alternative 5 infeasible.

Alternative 6: Maintenance and Storage Facility (MSF) Site Alternative

Description

The Project involves siting the MSF within the southeastern portion of the site at 500 E. Manchester Boulevard closest to the corner of Nutwood Street and Spruce Avenue that contains a Vons grocery store and gas station, with other businesses, including a private gym, bank branch and coffee shop located in the building with Vons. This siting of the MSF requires removal of the gas station currently located on the Vons site in order to provide for short-term construction staging to construct the MSF and, thereafter, to provide parking.

This Alternative moves the MSF to the northwestern portion of this property closest to the south corner of Hillcrest Boulevard and Manchester Boulevard. The site containing the MSF would be approximately 14,000 square feet in size.

This alternative would have the same elevated profile and footprint of the MSF and its supporting facilities (e.g., access, circulation, employee parking, etc.). With this alternative, the existing gas station would remain on the site. Under this Alternative, the building containing the grocery store and other businesses would be demolished. With the Project, a replacement Vons store would be built on the corner of Manchester Boulevard and Hillcrest Boulevard. With this alternative a replacement Vons store would not be built on this site.

Relationship to Project Objectives

Alternative 6 would meet most of the City's objectives since the Project would still be built and reductions to daily traffic volumes along key roadway corridors and reductions to VMTs on an average weekday basis with event would occur similar in magnitude to those associated with the Project. Alternative 6, however, would not meet the objective to encourage redevelopment and investment within the City in areas served by the Project to the same degree as would the Project because Alternative 6 would not include replacement of the existing Vons grocery store on the MSF site.

Comparative Impacts

Table 5.0-1 at the beginning of Chapter 5.0, Alternatives, of the Recirculated Draft EIR, provides an impact-by-impact comparison of the significant impacts of the Project and Alternative 6.

1. Aesthetics

The Project would not result in significant impacts to the aesthetic character of the community during construction or operation with implementation of the project design features in the ITC CCP and Design Guidelines. Similarly, Alternative 6 would travel down the same alignment with the same proposed and elevated guideway across the frontage of the buildings on Market Street. No additional impacts on the visual character of downtown would result from moving the MSF to the northwestern portion of the Vons site closest to the south corner of Hillcrest Boulevard and Manchester Boulevard.

2. Air Quality

Construction under Alternative 6 would be similar to the Project. During construction, the Project would not exceed the significance threshold for any criteria pollutant after mitigation, and impacts would be less than significant. Similar to the Project, Alternative 6 would not conflict with implementation of the applicable air quality plans and would not exceed thresholds established by the SCAQMD for criteria air pollutants.

Operational impacts associated with Alternative 6 would be similar to the Project as the ATS would be built as proposed. Moreover, reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis with event would occur similar in magnitude to those associated with the Project. As such, Alternative 6 would result in similar operational impacts compared to the Project.

3. Biological Resources

Approximately 502 trees which may require removal during construction of the Project exist along the Project alignment. With Alternative 6, no additional properties would need to be acquired and no additional demolition of buildings or site improvements would be required. As such, impacts to biological resources during construction would be similar compared to the Project. Similar to the Project, operation of Alternative 6 would not diminish the chances for long-term survival of bird species or their habitats and no additional tree and/or ornamental vegetation removals would be planned. As such, Alternative 6 would result in similar operational impacts compared to the Project.

4. Cultural Resources

Alternative 6 would have a less than significant impact on cultural resources, similar to the Project. The relocated MSF on the northwest portion of its site would have no impact on cultural resources and would not be located near any identified historical resources. For this reason, impacts to cultural resources would be similar for Alternative 6 and the Project.

5. Energy Resources

Energy demand from construction activities under Alternative 6 would be similar to the Project as the ATS would be built as proposed. Reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis would occur similar in magnitude to those associated with the Project. As such, Alternative 6 would result in similar operational impacts compared to the Project.

6. Geology and Soils

Impacts related to geology and soils conditions, including paleontological resources, would be similar to those identified for the Project. Geology and soils conditions that would be encountered in construction of Alternative 6 would be the same as with the Project. The Potrero Fault lies approximately one-quarter mile to the east of the project study area; however, compliance with the California Building Code would avoid the creation of seismic hazards. Ground-disturbing activity and the potential for accidental discovery of paleontological resources would continue to be potentially significant with Alternative 6. Alternative 6 would implement similar measures as the Project to mitigate the potential impacts on paleontological resources to less than significant.

7. Greenhouse Gas Emissions

Construction under Alternative 6 would be similar to the Project and would result in a similar level of GHG emissions. Reductions to daily traffic volumes along key roadway corridors and reductions to VMT on an average weekday basis would occur similar in magnitude to those associated with the Project. Therefore, similar to the Project, Alternative 6 would be consistent with the CARB 2017 Scoping Plan Update, the SCAG 2020-2045 RTP/SCS, the ECAP, and General Plan, which set goals to reduce GHG emissions by increasing energy efficiency and improving transit infrastructure. Operational GHG impacts would be similar to the Project.

8. Hazards and Hazardous Materials

Under Alternative 6, the MSF would be relocated to the northwestern portion of the Vons site. Construction under Alternative 6 would be similar to the Project. Construction of the guideway and stations in conjunction with the MSF and PDS substations would involve the demolition of the existing building, which may have the potential to release hazardous materials, such as ACMs, LBP, and other potentially hazardous building materials. Similar to the Project, construction activities under Alternative 6 would likely cause the temporary closure of travel lanes, roadways segments, and sidewalks along the elevated guideway and stations within the street rights-of-way. Construction of Alternative 6, however, would not involve demolition of the existing gas station at the MSF site, thereby resulting in a slightly reduced potential for the potential release of hazardous materials.

Under Alternative 6, operation of the ATS would include the use and storage of hazardous materials typical of those used in an industrial setting, similar to the Project. Alternative 6 would not interfere with or impair the City's ability to increase public awareness or make any improvements to emergency services and warning systems during operation. With adherence to the federal, State, and local safety requirements, Alternative 6 would not conflict with the requirements of an emergency response plan or

emergency evacuation plan, similar to the Project. As such, operational impacts under Alternative 3 would be similar to the Project.

9. Land Use and Planning

Alternative 6 would include the construction and operation of an ATS system similar to the Project while moving the MSF along Hillcrest Boulevard between Manchester Boulevard and Nutwood Street. With this alternative the existing gas station on this property would be retained, but the existing commercial building containing the grocery store and other businesses would be demolished. Under the Project a replacement Vons store would be constructed on the corner of Manchester Boulevard and Hillcrest Boulevard. Under Alternative 6, however, a replacement grocery store would not be provided on this site. Nevertheless, the community is served by other grocery stores and the loss of this store is not considered a significant land use impact for this reason.

The Project would not create a physical division of the existing community as the ATS guideway and stations would be elevated and the existing configuration of travel lanes on Market Street, Manchester Boulevard and Prairie Avenue would be maintained.

Alternative 6 would be generally consistent with the existing regional and local land use plans and policies. Alternative 6 would require the same amendments to the Land Use Element, Circulation Element, Safety Element, Environmental Justice Element, and the Inglewood Municipal Code as the Project to incorporate the ATS system into these plans and regulations.

10. Noise and Vibration

Construction under Alternative 6 would be similar to the Project and would result in similar noise levels. Moreover, Alternative 6 would implement similar mitigation measures as the Project to reduce construction noise and vibration impacts to less than significant. Alternative 6 would result in reductions to daily traffic volumes along key roadway corridors and VMT on an average weekday basis would occur similar in magnitude to those estimated for the Project. As such, this alternative would result in similar roadway noise levels as the Project. Neither this alternative or the Project would result in significant noise and vibration impacts.

11. Population, Employment, and Housing

The Project would have no direct impact on housing as the Project does not include the construction or demolition of housing units. The Project would impact existing employment opportunities in the City as commercial uses that would be displaced by the Project are estimated to be approximately 464 jobs.

However, the Project would result in a net increase of approximately 11,052[13] FTE jobs through the Greenhouse Gas Reduction Funds, as estimated by the Job Co-Benefits calculation (see **Section 4.11 Population, Employment, and Housing**). The number of jobs that will be supported by the Project in the region is within the projected regional trends in the SCAG 2020-2045 RTP/SCS data and the jobs that will benefit from the Project will not directly translate into additional population growth in the region. As such the Project would have a less than significant impact on inducing employment and population growth.

Alternative 6 would result in the demolition of the existing Vons grocery store and other businesses on site (with the exception of the existing gas station). It is possible that these businesses might choose not to relocate, which would result in corresponding job losses. Overall, alternative 6 would maintain the existing population, employment, and housing trends within the City and the region. As such, Alternative 6 would not directly or indirectly substantially induce population in the City or the region. Employment support and would be similar to the Project under Alternative 6.

12. Transportation

Construction under Alternative 6 would be similar to the Project. The Project and all of its components would be constructed and operate. The operation of the ATS would be the same as planned for the Project.

Similar to the Project, Alternative 6 would result in operational benefits. Reductions to daily traffic volumes along key roadway corridors and reductions to VMTs on an average weekday basis would occur similar in magnitude to those associated with the Project. Additionally, this alternative is estimated to result in transit ridership similar to the Project. Finally, Alternative 6 would provide similar operational benefits as those of the Project relative to reduction in traffic congestion and improvement of traffic flows along key roadway facilities areawide.

13. Tribal Cultural Resources

The Project would have a less than significant impact on Tribal Cultural Resources (TCRs), No TCRs were identified in the records around the Project site and no sensitive resources were identified. Nonetheless, the Project as proposed would include construction which would have the potential to unearth subsurface resources not previously identified. Given the level of urban development in Inglewood, the likelihood of unearthing TCRs is low but it is still a possibility. Relocating the MSF to the northwestern portion of the Vons site would not result in any additional impacts.

13 11,516 minus 464 in numbers of jobs displaced.

14. Utilities and Service Systems

Construction and operation under Alternative 6 would be similar to the Project. For this reason, impacts related to the construction or relocation of water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities would be similar compared to the Project.

Basis for Finding

Alternative 6 would result in similar impacts compared to the Project. Alternative 6 would result in reductions to daily traffic volumes along key roadway corridors in a similar magnitude to those associated with the Project. However, Alternative 6 would not meet the objective to encourage redevelopment and investment within the City to the same degree as would the Project because Alternative 6 would not include replacement of the existing Vons grocery store on the MSF site. This provides sufficient independent grounds for rejecting this alternative.

Finding

Specific economic, legal, social, technological, or other considerations, make Alternative 6 infeasible.

Conclusion

The Project meets all the City's goals and objectives to deliver a world-class transportation system and provide a direct connection between downtown Inglewood and the major activity centers to the Metro Regional rail system. Compared to other alternatives reviewed and rejected, the ITC presents the opportunity for integration with local economic activity, current and future transit-oriented development, and support for the revitalization of the downtown/commercial district of Inglewood. The Project is anticipated to generate a high transit ridership, will meet the City's operational demands during events and non-event days and represents one of the most cost-effective transit solutions compared to other alternatives, avoids significant construction impacts to the adjacent commercial uses, and avoids acquisition of residential property along the alignment. Other alternatives considered are fundamentally inconsistent with City goals. The Fairview Heights Alternative connecting Florence Avenue onto Prairie Avenue would potentially impact the Inglewood Cemetery and does not generate economic development opportunities within the City. The Alternative on Arbor Vitae Street, whose right-of-way ranges from 100 feet to 66 feet, would potentially require acquisition of existing small businesses and possible residential neighborhood displacement. The Century Boulevard Alternative had many major utility conflicts and would have major design challenges as the transition from an elevated segment to a level sufficient under the I-405 may not be feasible due to the short distance

available and the real estate constraint between Century Boulevard and the LAX LAMP Manchester Square development.

An Interlined Operability Scenario was also initially studied by LA Metro and the City of Inglewood and was determined to be infeasible due to the cost and complexity of this type of system and extension of the Metro K Line. Underground APM options were preliminarily reviewed and rejected due to the significantly higher costs and conflicts with the major underground utilities along Prairie Avenue. Transitioning from an underground to an elevated option along Prairie would cut off major roadways at the transition - a fatal flaw to traffic circulation and capacity. An at-grade transit system along Market Street was initially considered but determined to be infeasible because it would result in significant traffic impacts, would not have the capacity to meet peak ridership demands, and would be more costly to build and/or operate than the proposed Project. The BRT option would be located entirely within the public right-of-way, would include bus-only lanes that would reduce roadway lane capacities for mixed-flow traffic, and would not provide the level of service of capacity desired for event days.

The Market Street Promenade Alternative would not meet goal of maintaining roadway capacity, could potentially hurt local businesses, and is generally deemed premature until temporary closures of Market Street are activated for occasional events, such as farmer's markets, block parties, and art walks. The 4th Station Alternative is rejected because it is too expensive, increases construction related impacts along Manchester Boulevard and would have negative impacts on adjacent sidewalks without providing a substantial increase in transit ridership. While a Prairie Avenue Single Station Alternative meets some City objectives, it would not provide the highest levels of service and acceptable walk distances to the various event venues. Lastly, the MSF site alternative is rejected because the City has identified a more suitable location for the MSF and is collaborating with the Vons to replace the new supermarket at its current location.

Based on the technical evaluation and public stakeholder input, the Project provides a convenient, reliable, time-certain transit connectivity to the City's major employment, housing, and activity centers from the regional Metro Rail system, achieving new economic and air quality benefits to the City of Inglewood and the Southern California region.

Attachment C
August 16-17, 2023
Reference 2.2c.(4)

NOTICE OF DETERMINATION

To: Office of Planning and Research
1400 Tenth Street, Room 121
Sacramento, CA 95814

From: California Transportation Commission
Attn: Cherry Zamora
1120 N Street, MS 52
Sacramento, CA 95814
(916) 654-4245

Subject: Filing of Notice of Determination in compliance with Section 21108 of the Public Resources Code.

Project Title: Inglewood Transit Connector Project

2018071034	Louis Atwell	(310) 412-5333
State Clearinghouse Number	**Lead Agency Contact Person**	**Area Code/Telephone**

Project Location (include county): The project is primarily located in the public right-of-way along Market Street, Manchester Boulevard, and Prairie Avenue in the City of Inglewood in Los Angeles County.

Project Description: The Project will construct a 1.6-mile, three-station, fully elevated, electrically powered automated transit system that will connect passengers directly to the Metro K Line's Downtown Inglewood station and complete the last-mile gap between Metro and the City's new major employment and activity centers including The Forum, SoFi Stadium, the Intuit Dome, and adjacent development. The Project also includes a maintenance and storage facility, power distribution system substations, roadway improvements, pick-up and drop-off areas, and parking facilities.

This is to advise that the California Transportation Commission has approved the above-described
(_ Lead Agency/ **X** Responsible Agency)
project on August 16-17, 2023, and has made the following determinations regarding the above-described project:

1. The project (__will/ _X_will not) have a significant effect on the environment.
2. __X__A Final Environmental Impact Report and Addendum was prepared for this project pursuant to the provisions of CEQA.
   ____A Mitigated Negative Declaration was prepared for this project pursuant to the provisions of CEQA.
3. Mitigation measures (_X_were/____were not) made a condition of the approval of the project.
4. Mitigation reporting or monitoring plan (_X_was / ___was not) adopted for this project.
5. A Statement of Overriding Considerations (__was / _X_was not) adopted for this project.
6. Findings (_X_were/ ___were not) made pursuant to the provisions of CEQA.

The above identified document with comments and responses and record of project approval is available to the General Public at: https://www.cityofinglewood.org/1016/Environmental-Documents or 1 Manchester Boulevard, Inglewood, CA 90301

TANISHA TAYLOR		Executive Director California Transportation Commission
Signature (Public Agency)	*Date*	*Title*

Date received for filing at OPR:

Project Location Map