

# CHAPTER 3

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## Environmental Impacts, Settings, and Mitigation Measures

### 3.0 Introduction

This environmental impact report (EIR) evaluates the physical environmental effects that would potentially occur from implementation of the Proposed Project. The structure of the technical sections included in this chapter are discussed below. In addition, this section describes those environmental effects that are typically considered under the California Environmental Quality Act (CEQA) would not be affected by the Proposed Project and, pursuant to CEQA, and are not further analyzed in this EIR.

#### 3.0.1 Definitions of Terms Used in the EIR

This EIR uses a number of terms that have specific meaning under CEQA. Among the most important of the terms used in the EIR are those that refer to the significance of environmental impacts. The following terms to describe environmental effects of the Proposed Project:

- **Significance Criteria:** A set of criteria used by the lead agency (City of Inglewood) to determine at what level or threshold an impact would be considered significant. Standards of significance used in this EIR include those standards provided by the City of Inglewood unless otherwise specifically defined. In determining the level of significance, the analysis assumes that the Proposed Project would comply with relevant federal, State, and local regulations and ordinances.
- **No Impact:** A project impact is considered to have no impact when the Proposed Project would result in no direct or indirect adverse changes (or impacts) to the environment, with respect to the applicable significance criterion. A project impact with a no impact determination would not contribute in any way to a cumulative impact.
- **Less-than-Significant Impact:** A project impact is considered less than significant when the physical change caused by the Proposed Project would not exceed the applicable significance criterion.
- **Potentially Significant Impact:** A potentially significant impact is identified where the Proposed Project may cause a substantial adverse change in the environment, depending on certain unknown conditions related to the project or the affected environment. For CEQA purposes, a potentially significant impact is treated as if it were a significant impact. A project impact is considered potentially significant if the Proposed Project would exceed identified standards of significance thereby result in in a substantial adverse change in the

physical conditions of the environment. Significant impacts are identified by the evaluation of project-related physical change compared to specified significance criteria. A significant impact is defined as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.”<sup>1</sup> In instances where potentially significant impacts are identified, the EIR must consider whether mitigation measures (as defined below) or alternatives to the project, would reduce those impacts.

- **Significant and Unavoidable Impact:** A project impact is considered significant and unavoidable if it would result in a substantial adverse physical change in the environment that cannot be feasibly avoided or mitigated to a less-than-significant level.
- **Cumulative Impact:** Under CEQA, a cumulative impact refers to “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.”<sup>2</sup> Like any other significant impact, a significant cumulative impact is one in which the cumulative adverse physical change would exceed the applicable significance criterion, thus making the Proposed Project’s contribution “cumulatively considerable.”<sup>3</sup>
- **Mitigation Measure:** A mitigation measure is an action that could be taken that would avoid or reduce the magnitude of a significant impact. Section 15370 of the State CEQA Guidelines defines mitigation as:
  - a. Avoiding the impact altogether by not taking a certain action or parts of an action;
  - b. Minimizing impacts by limiting the degree of magnitude of the action and its implementation;
  - c. Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;
  - d. Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and
  - e. Compensating for the impact by replacing or providing substitute resources or environments.

### 3.0.2 Section Format

Chapter 3 is divided into technical sections (e.g., section 3.1, Aesthetics) that present for each environmental resource issue area the physical environmental setting, the regulatory setting, standards of significance from which impacts are measured, analytical methods, and impacts to the environment, and, where required, potentially feasible mitigation measures for significant impacts. Each section includes an analysis of project-specific and cumulative impacts for each issue area.

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<sup>1</sup> State CEQA Guidelines, section 15382.

<sup>2</sup> State CEQA Guidelines, section 15355.

<sup>3</sup> State CEQA Guidelines, section 15130(a).

The technical environmental sections each begin with a description of the project's **environmental setting** and the **regulatory setting** as it pertains to a particular issue. The environmental setting provides a point of reference for assessing the environmental impacts of the Proposed Project and project alternatives. The environmental setting discussion addresses the conditions that exist prior to implementation of the project. The regulatory setting presents relevant information about federal, state, regional, and/or local laws, regulations, plans or policies that pertain to the environmental resources addressed in each section.

Next, each section presents **significance criteria**, which identify the standards used by the City of Inglewood to determine the significance of effects of the Proposed Project. Section 15064.7 of the State CEQA Guidelines states that "...a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." The significance criteria used for this project were derived from extensive review and consideration of several environmental documents prepared by the City of Inglewood and Los Angeles World Airports (LAWA). Significance criteria from the following City and LAWA documents were reviewed and considered:

- Hollywood Park Specific Plan (HPSP) Draft EIR (Inglewood);<sup>4</sup>
- Downtown Inglewood & Fairview Heights (DI & FH) TOD Draft EIR (Inglewood).<sup>5</sup>
- Midfield Satellite Concourse (MSC) Draft EIR (LAWA);<sup>6</sup>
- LAX Master Plan Final EIS/EIR (LAWA);<sup>7</sup>
- Northside Plan Update Final EIR (LAWA);<sup>8</sup>
- Specific Plan Amendment Study (SPAS) Final EIR (LAWA);<sup>9</sup>
- Tom Bradley International Terminal (TBIT) Final EIR (LAWA);<sup>10</sup>
- West Aircraft Maintenance Area (WAMA) Final EIR (LAWA);<sup>11</sup>

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<sup>4</sup> Christopher A. Joseph & Associates, 2008. Draft Environmental Impact Report for the Hollywood Park Redevelopment Project. Prepared for the City of Inglewood Planning and Building Department. October 9.

<sup>5</sup> Metis Environmental Group, 2016. Draft Environmental Impact Report for the Transit Oriented Development Plan for Downtown Inglewood and Fairview Heights. State Clearinghouse No. 2016041011. July.

<sup>6</sup> City of Los Angeles, Los Angeles World Airports, 2014. Draft Environmental Impact Report for Los Angeles International Airport (LAX) Midfield Satellite Concourse. State Clearinghouse No. 2013021020. March.

<sup>7</sup> City of Los Angeles, Los Angeles World Airports, 2004. Final Environmental Impact Report for LAX Master Plan. April.

<sup>8</sup> City of Los Angeles, Los Angeles World Airports, 2014. Final Environmental Impact Report for Los Angeles International Airport (LAX) Northside Plan Update. State Clearinghouse No. 2012041003. May.

<sup>9</sup> City of Los Angeles, Los Angeles World Airports, 2012. Draft Environmental Impact Report for LAX Specific Plan Amendment Study. July.

<sup>10</sup> City of Los Angeles, Los Angeles World Airports, 2009. Draft Environmental Impact Report for Los Angeles International Airport (LAX) Bradley West Project. State Clearinghouse No. 208121080. May.

<sup>11</sup> City of Los Angeles, Los Angeles World Airports, 2013. Draft Environmental Impact Report for Los Angeles International Airport (LAX) West Aircraft Maintenance Area Project. State Clearinghouse No. 2012091037. October.

- LAX Sign District Draft EIR (LAWA);<sup>12</sup> and
- LAX Landside Access Modernization Program (LAMP) Final Environmental Assessment and Final General Conformity Determination (LAWA).<sup>13</sup>

The City also reviewed the State CEQA Guidelines Appendix G checklist (2018)<sup>14</sup> and technical advisories prepared by the Governor’s Office of Planning and Research (OPR), and considered best practices for the establishment of thresholds of significance.

A **methods and assumptions** description in each section presents the analytical methods and key assumptions used in the evaluation of effects of the Proposed Project, and is followed by an **impacts and mitigation** discussion. The impact and mitigation portion of each section includes impact statements, prefaced by a number in bold-faced type. An explanation of each impact is followed by an analysis of its significance. The subsection concludes with a statement that the impact, following implementation of the mitigation measure(s) and/or the continuation of existing policies and regulations, would be reduced to a less-than-significant level or would remain significant and unavoidable.

The analysis of environmental impacts considers both the construction and operational phases associated with implementation of the Proposed Project. As required by section 15126.2(a) of the State CEQA Guidelines, direct, indirect, short-term, long-term, onsite, and/or off-site impacts are addressed, as appropriate, for the environmental issue area being analyzed. Depending on the significance criteria, the impact analysis may consist of a qualitative discussion, a quantitative analysis, or a combination of both. Detailed technical appendices are also provided for several technical sections, where appropriate, and can be located at the end of the document.

Under CEQA, economic or social changes by themselves are not considered to be significant impacts, but may be considered in linking a project to a physical environmental change, or in determining whether an impact is significant (see CEQA Guidelines, section 15131). As such, this EIR includes consideration of potential adverse physical environmental effects of economic changes that could be triggered by the Proposed Project. This issue is addressed in Chapter 4, Other CEQA Required Sections.

Where enforcement exists and compliance can be reasonably anticipated, this EIR reasonably assumes that the Proposed Project would meet the requirements of applicable policies, laws, and other regulations related to the reduction of environmental impacts.

Mitigation measures pertinent to each individual impact, if necessary, appear after the impact discussion section. The magnitude of reduction of an impact and the potential effect of that

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<sup>12</sup> City of Los Angeles, Los Angeles World Airports, 2012. Draft Environmental Impact Report for Los Angeles International Airport (LAX) Sign District. State Clearinghouse No. 2012031055. October.

<sup>13</sup> City of Los Angeles, Los Angeles World Airports, 2017. Final Environmental Assessment and Final General Conformity Determination for Los Angeles International Airport (LAX) Landside Access Modernization Program. December.

<sup>14</sup> California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387.

reduction in magnitude on the significance of the impact is also disclosed. An example of the format is shown below.

## Impacts and Mitigation Measures

### Impact 3.X-1: Impact statement

A discussion of the Proposed Project’s impact is provided in paragraph form. A statement level of significance before application of any mitigation measures is provided in **bold**.

#### Mitigation Measure

##### **Mitigation Measure 3.X-1**

*Mitigation measure presented in italics and numbered to match the impact number.*

**Level of Significance After Mitigation:** This paragraph describes how the mitigation measure(s) reduces the impact and identifies the residual level of impact in **bold**.

## Cumulative Impacts

An analysis of cumulative impacts follows the project-specific impacts and mitigation measures evaluation in each section. As defined in State CEQA Guidelines section 15355, a cumulative impact consists of an impact that is created as a result of the combination of the Proposed Project evaluated in the EIR together with other past, present and reasonably foreseeable projects causing related impacts. An introductory explanation that refers to the cumulative analysis methodology and identifies the cumulative context being analyzed for respective sections (e.g., the South Coast Air Basin) is included at the beginning of the cumulative impact analysis in each technical section. In some instances, a project-specific impact may be considered less than significant, but may be considered potentially significant in combination with development of the surrounding area or in combination with regional growth projections. In some instances, a potentially significant impact may result on a project level but would not result in a considerable contribution to a significant cumulative impact. The cumulative impacts analysis is formatted the same as the project-specific impacts, as shown above.

### 3.0.3 Issues Previously Determined to be Less Than Significant

Upon review of the Proposed Project, the City of Inglewood determined that due to the physical characteristics of the project site and the Project as proposed, several environmental issues would involve impacts that would be less than significant and need not be further considered in the Draft EIR.<sup>15</sup> The discussions below provide brief statements of reasons for the City’s determination that these issues do not warrant further consideration in the EIR.

<sup>15</sup> Public Resources Code section 21003(e) states that “[t]o provide more meaningful public disclosure, reduce the time and cost required to prepare an environmental impact report, and focus on potentially significant effects on the

## **Aesthetics**

This Draft EIR includes a section on Aesthetics that considers potential effects of the Proposed Project on the visual character of the project site and vicinity, as well as effects related to light and glare. However, as discussed below, issues related to scenic vistas, highways, and resources would not be affected and are not further addressed in this Draft EIR.

### ***Scenic Vistas***

The City of Inglewood does not designate scenic vistas within its General Plan. The nearby County of Los Angeles recognizes the coastline, mountain vistas, hillsides, scenic viewsheds, and ridgelines as significant scenic resources.<sup>16</sup> The nearby City of Los Angeles identifies scenic vistas as panoramic public view access to natural features, including views of the ocean, striking or unusual terrain, or unique urban or historic features.<sup>17</sup> The project site is located in an entirely urban area. There are no scenic vistas that provide views of the coastline, mountain vistas, hillsides, scenic viewsheds, ridgelines, striking or unusual terrain, or unique urban or historic features on or near the project site. Because such scenic resources are not present and, thus, would not be affected by the Proposed Project, a substantial adverse effect on a scenic vista would not occur. There would be no impact.

### ***Scenic Highways and Scenic Resources***

The project site is not within an officially designated State or county scenic highway as designated by the California Department of Transportation (Caltrans) and/or the County of Los Angeles.<sup>18</sup> Additionally, the project site is not located within State Route (SR) 27, which was recently designated as a scenic highway (but is not yet mapped).<sup>19</sup> The project site is not located within any designated scenic highway as listed in the Inventory of Designated Scenic Highways by the City of Los Angeles.<sup>20</sup> The nearest designated scenic highway is the City of Los Angeles-designated Crenshaw Boulevard corridor from the 10 Freeway to Slauson Avenue, approximately 3.1 miles northeast of the project site. The Forum, a historic building due to its age, is visible to the north of the project site. However, the Forum is approximately one-eighth of a mile from the project site, with intervening structures in between that are currently under construction.

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environment of a proposed project, lead agencies shall, in accordance with Section 21100, focus the discussion in the environmental impact report on those potential effects on the environment of a proposed project which the lead agency has determined are or may be significant. Lead agencies may limit discussion on other effects to a brief explanation as to why those effects are not potentially significant.”

- 16 County of Los Angeles, 2015. Los Angeles County General Plan 2035, Chapter 9: Conservation and Natural Resources Element, pp. 159-160. Available: [http://planning.lacounty.gov/assets/upl/project/gp\\_final-general-plan-ch9.pdf](http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch9.pdf). Accessed October 16, 2018.
- 17 City of Los Angeles Department of City Planning, 2001. City of Los Angeles General Plan, Conservation Element, p. II-47. Available: <https://planning.lacity.org/cwd/gnlpln/consvelt.pdf>. Accessed October 16, 2018.
- 18 California Department of Transportation, 2018. California Scenic Highway Mapping System, Los Angeles County. Available: [http://www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/index.htm](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm). Accessed September 24, 2018.
- 19 California Department of Transportation, 2018. Scenic Highways. Available: <http://www.dot.ca.gov/design/lap/livability/scenic-highways/index.html>. Accessed October 16, 2018.
- 20 City of Los Angeles Department of City Planning, 2016. City of Los Angeles General Plan, Mobility Plan 2035, pp. 170-172. Available: <https://planning.lacity.org/documents/policy/mobilityplnmemo.pdf>. Accessed October 16, 2018.

Additional urban development would be constructed between the Forum and the project site. Therefore, the Proposed Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. There would be no impact.

## **Agricultural and Forestry Resources**

### ***Convert Farmland to Non-Agricultural Uses***

The area surrounding the project site is characterized by dense urban development, as well as vacant, undeveloped parcels that were previously developed over many years and recently cleared for redevelopment. The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (collectively referred to as 'Farmland'), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.<sup>21</sup> Although the project site would be classified as Prime Farmland if irrigated, based on soil types, the project site and its surrounding area are developed with urban uses and is classified as Urban Land.<sup>22</sup> As such, the Proposed Project would not convert Farmland, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. There would be no impact.

### ***Conflict with Zoned Agricultural Use or Williamson Act Contract***

The project site is not included in the most recently released map showing Williamson Act contracts within Los Angeles County.<sup>23</sup> Subsequently, no portions of the project site are subject to a Williamson Act contract. The majority of the project site is designated as Industrial, with some small portions zoned as Commercial, Residential, or Limited Manufacturing. The Proposed Project would not conflict with existing zoning for agricultural use, and would not conflict with a Williamson Act contract. There would be no impact.

### ***Conflict with Existing Zoning or Rezoning of Timberland***

The project site is not zoned for timberland or timberland production by the City of Inglewood. The majority of the project site is designated as Industrial, with some small portions zoned as Commercial, Residential, or Limited Manufacturing. Therefore, the Proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. There would be no impact.

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<sup>21</sup> California Department of Conservation Division of Land Resource Protection, 2016. California Important Farmland Finder. Available: <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed September 24, 2018.

<sup>22</sup> United States Department of Agriculture, Natural Resources Conservation Service, 2018. Web Soil Survey, Farmland Classification of Los Angeles County, California, Southeastern Part. Available: <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>. Accessed May 15, 2018.

<sup>23</sup> California Department of Conservation Division of Land Resource Protection, 2016. Los Angeles County Williamson Act FY 2015/2016 Map. Available: [ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA\\_15\\_16\\_WA.pdf](ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf). Accessed September 24, 2018.

### ***Result in the Loss of Forest Land or Conversion of Forest Land to Non-Forest Use***

The project site is characterized by dense, urban development. The project site is not located on land that is zoned as forest land, either by the County of Los Angeles or by the City of Inglewood. As discussed above, since the project site is not irrigated and is surrounded by urban land, it is classified as Urban Land by the Natural Resources Conservation Service. Therefore, implementation of the Proposed Project would not result in the loss of forest land or the conversion of forest land to non-forest use. There would be no impact.

### ***Other Changes Resulting in conversion of Farmland to Non-Agricultural Uses, or Conversion of Forest Land to Non-Forest Uses***

As discussed above, the project site is located within an urban environment characterized by dense development. The project site is not zoned as Farmland, and is classified as Urban Land. The project site is not under a Williamson Act contract. The project site is not zoned for agricultural use, nor is it designated for timberland, timberland production, or as forest land. Additionally, the project site is not currently utilized for agriculture, timberland or timberland production, or forest land. As such, the Proposed Project would not involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland to non-agricultural use and would not result in the conversion of forest land to non-forest use. There would be no impact.

## **Biological Resources**

This Draft EIR includes a section on Biological Resources that considers potential effects of the Proposed Project on sensitive species, migratory species, and whether or not the Proposed Project would conflict with local policies or ordinances. However, as discussed below, issues related to riparian habitat, federally protected wetlands, and whether or not the Proposed Project would conflict with a conservation plan would not be affected and are not further addressed in this Draft EIR.

### ***Riparian Habitat or Other Sensitive Natural Communities***

The project site does not contain any riparian habitat and does not contain any streams or water courses necessary to support riparian habitat. The majority of the project site is vacant, undeveloped land that has been previously developed and cleared, is heavily disturbed and regularly maintained, with the remaining parts of the project site being developed with uses. These conditions do not support any other sensitive natural communities. The nearest open space with natural communities is the Kenneth Hahn State Recreation Area, located approximately 4.5 miles northwest of the project site. As a result of these conditions, the Proposed Project would not have any effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS). There would be no impact.

## **Federally Protected Wetlands**

Based on the 2018 biological reconnaissance survey, there were no wetlands or other aquatic features that could potentially be protected by federal or state regulations. Therefore, construction and operation of the Proposed Project would not be anticipated to impact federal or state jurisdictional resources, including wetlands.

## **Habitat Community Plan or Natural Community Conservation Plan**

The project site is not located within the boundaries of, or in the vicinity of, any habitat conservation plan (HCP) or Natural Communities Conservation Plan (NCCP). The closest designated HCP (the City of Rancho Palos Verdes HCP) is located approximately 10 miles south/southwest from the project site.<sup>24</sup> Since there would be no interaction between the Proposed Project and an approved HCP or NCCP, the Proposed Project would not conflict with the provisions of any adopted conservation plan. There would be no impact.

## **Geology and Soils**

### **Exposure of People or Structures to Potential Substantial Adverse Effects**

The California Supreme Court recently found that “agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project’s future users or residents.” In *California Building Industry Association v. Bay Area Air Quality Management District* (2015) \_\_ Cal.4th \_\_, 2015 WL 9166120 (Case No. S213478), the Supreme Court explained that an agency is only required to analyze the potential impact of such hazards on future residents if the project would exacerbate those existing environmental hazards or conditions. Ordinary CEQA analysis is therefore concerned with a project’s impact on the environment, rather than with the environment’s impact on a project and its users or residents. Thus, with respect to geologic and seismic hazards, the City is not required to consider the effects of bringing people or structures into an area where such hazards exist, because the project itself would not increase or otherwise affect the geologic conditions that create those risks. Nonetheless, in order to provide a complete picture of the Proposed Project, these impacts are addressed below.

### **Alquist-Priolo Earthquake Fault Zone**

No known active, sufficiently active, or well-defined faults have been recognized as crossing or being immediately adjacent to the project site.<sup>25,26</sup> The California Geological Survey (CGS) does not delineate any part of the project site as being within an Alquist-Priolo Earthquake Fault Zone. The Alquist-Priolo Earthquake Fault Zone closest to the project site is the Newport-Inglewood Fault, located approximately 1.13 miles to the northwest.<sup>27</sup> Since there are no active faults on or adjacent to the project site, the Proposed Project would not expose people or structures to

<sup>24</sup> City of Rancho Palos Verdes, 2004. Natural Communities Conservation Planning Subarea Plan, Figure 2-1. Available: [https://pvplc.org/\\_lands/docs/NCCP.pdf](https://pvplc.org/_lands/docs/NCCP.pdf). Accessed September 24, 2018.

<sup>25</sup> A sufficiently active fault is “one that has evidence of Holocene surface displacement along one or more of its segments or branches.”

<sup>26</sup> AECOM, 2018. Preliminary Geotechnical Report for Murphy’s Bowl LLC. Page 16.

<sup>27</sup> AECOM, 2018. Preliminary Geotechnical Report for Murphy’s Bowl LLC. Page 16.

potential substantial adverse effects, including the risk of loss, injury, or death involving the rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the California State Geologist for the area. There would be no impact.

### **Strong Seismic Ground Shaking**

The project site is located in a seismically active region with numerous active faults. The Newport-Inglewood Fault is the active fault closest to the project site, which is approximately 1.13 miles to the northwest.<sup>28</sup> Given the proximity of known faults, there is potential for high-intensity groundshaking associated with the earthquakes in this region. The intensity of such an event would depend on the causative fault and the distance to the epicenter, the strength and duration of shaking, and the nature of the geologic materials on which the Proposed Project would be constructed. The geologic material on which the Proposed Project would be constructed would be removed, compacted, or replaced as necessary pursuant to further subsurface investigations of areas where near-surface structures are planned.<sup>29</sup> All fill and backfill materials would be observed and tested by the geotechnical engineer prior to their use in order to evaluate their suitability. The properties of fill and backfill material that would be investigated may include grain size, shear strength, compressibility, expansion, compaction, and corrosivity characteristics.<sup>30</sup>

The structural elements of the Proposed Project would be required to undergo appropriate design-level geotechnical evaluations prior to final design and construction. Implementing the regulatory requirements of the California Building Code (CBC), County and City ordinances, the CGS Guidelines for Evaluating and Mitigating Seismic Hazards in California, and ensuring all buildings and structures are constructed in compliance with the law is the responsibility of the project engineers and building officials. The two proposed pedestrian footbridges would utilize cast-in-drilled-hole piles (CIDH) or spread footings. Construction of the footbridges would undergo the same geotechnical investigations to ensure that the soil or fill is suitable to support the footbridges; any unsuitable material would be excavated and compacted until suitable.<sup>31</sup> Compliance with the CBC and local ordinances would minimize the potential for damage from strong seismic ground shaking. The Proposed Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. The impact would be less than significant.

### **Seismic-Related Ground Failure Including Liquefaction**

Liquefaction occurs when saturated, granular soils lose their inherent shear strength due to excess pore water pressure build-up, such as that generated during repeated cyclic loading from an earthquake. Factors that contribute to liquefaction include low relative density and loose

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<sup>28</sup> AECOM, 2018. Preliminary Geotechnical Report for Murphy's Bowl LLC. Page 13.

<sup>29</sup> AECOM, 2018. Preliminary Geotechnical Report for Murphy's Bowl LLC. Page 22.

<sup>30</sup> AECOM, 2018. Preliminary Geotechnical Report for Murphy's Bowl LLC. Page 24.

<sup>31</sup> AECOM, 2018. Preliminary Geotechnical Report for Murphy's Bowl LLC. Page 22.

consistency of soils, shallow groundwater tables, and long duration and high acceleration of seismic ground shaking. The project site is not within a liquefaction zone area as mapped by the CGS, as shown in the Earthquake Zones of Required Investigation Map, Inglewood Quadrangle.<sup>32</sup> The historic high groundwater level beneath the project site is reported as 50 feet below the existing ground surface, and the project site is characterized by the presence of dense to very dense and very stiff to hard soils.<sup>33</sup> The Proposed Project would not exposure people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. There would be no impact.

### **Landslides**

The project site and its surrounding area are relatively flat, with gentle slopes from east to west and north to south, depending on the parcel. The project site is not within areas designated by the State Geologist where previous landslide movement has occurred.<sup>34</sup> The project site is also not mapped within areas designated as having the potential for seismically induced landslides.<sup>35</sup> Local topographic, geological, geotechnical, and subsurface conditions indicate that the potential for permanent ground displacement, such as a landslide, is minimal.<sup>36</sup> The Proposed Project would not exposure people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. There would be no impact.

### ***Substantial Erosion or Loss of Topsoil***

Erosion of exposed soils can occur as a result of the forces of wind or water. Substantial earth work and excavation would occur during Project construction. Additionally, the project site would change from largely permeable (soil) surfaces to developed hardscape areas that are impervious. Projects that disturb more than 1 acre of land during construction, such as the Proposed Project, are required to file a Notice of Intent (NOI) with the State Water Resources Control Board (SWRCB) to be covered under the National Pollution Discharge Elimination System (NPDES) Construction General Permit for discharges of stormwater associated with construction activity. The project proponent must develop measures that are consistent with the Construction General Permit, such as the preparation of a Stormwater Pollution Prevention Plan (SWPPP). Prior to construction of the Proposed Project, the project applicant would be required to prepare a SWPPP, which would describe best management practices (BMPs) that would be implemented to reduce runoff and subsequent erosion. The SWRCB also issues the NPDES Municipal Separate Storm Sewer System (MS4) Permit. The MS4 permit imposes a number of basic programs, called Minimum Control Measures, on all permittees in order to maintain a level of acceptable runoff conditions through the implementation of practices, devices, or designs generally referred to as BMPs, that mitigate stormwater quality problems, including erosion, during construction and operational phases of a project. During construction of the Proposed Project, all activities would be required to adhere to the applicable BMPs that would be

<sup>32</sup> AECOM, 2018. Preliminary Geotechnical Report for Murphy's Bowl LLC. Page 17.

<sup>33</sup> AECOM, 2018. Preliminary Geotechnical Report for Murphy's Bowl LLC. Page 17.

<sup>34</sup> AECOM, 2018. Preliminary Geotechnical Report for Murphy's Bowl LLC. Page 11.

<sup>35</sup> AECOM, 2018. Preliminary Geotechnical Report for Murphy's Bowl LLC. Page 18.

<sup>36</sup> AECOM, 2018. Preliminary Geotechnical Report for Murphy's Bowl LLC. Page 11.

prescribed in order to prevent erosion and runoff during construction. Therefore, adherence to these NPDES requirements would ensure that erosion control BMPs are implemented during construction which would reduce potential impacts to less than significant levels.

With implementation of the Proposed Project, it is estimated that approximately 90 percent of the project site would be covered by impervious surfaces (an increase in approximately 15 percent). During operation of the Proposed Project, most of the project site would be covered with impervious surfaces such as asphalt or concrete that include required drainage control measures consistent with NPDES MS4 requirements such that the potential for erosion or loss of topsoils would be reduced to less than significant levels. Further, compliance with the County's Low Impact Development (LID) Standards Manual, the proposed project would utilize a combination of County standard bio-filtration planters and bio-filtration systems to treat the stormwater. Runoff would be directed from drainage areas to onsite bio-filtration plants and bio-swales. The bio-filtration systems are designed to capture site runoff from roof drains, treat the runoff through biological reactions within the planter soil media, and discharge at a rate intended to mimic pre-developed conditions. Given the developed nature of the Proposed Project, the project site would not be readily susceptible to erosion.<sup>37</sup> Overall, the Proposed Project would not result in substantial soil erosion or the loss of topsoil, on- or off-site. The impact would be less than significant. Erosion is further discussed in section 3.8, Hydrology and Water Quality, under Impact 3.8-3.

### ***Located on a Geologic Unit or Soil that is Unstable or Would Become Unstable***

Collapsible soils undergo settlement upon wetting, even without the application of additional load. Water weakens the bonds between soil particles and reduces the bearing capacity of the soil. Collapsible soils are typically lightly colored, have low plasticity, and relatively low densities. The project site fill soils are expected to be predominantly clayey, which are not soil properties that typically lead to collapsible soils.<sup>38</sup>

Subsidence is the gradual settling or sinking of the ground, most often caused by the removal of water, oil, natural gas, or mineral resources from the ground.<sup>39</sup> There is no historic evidence of subsidence in the City of Inglewood, and no major extraction of water or petroleum is planned in the vicinity of the project site in the future.<sup>40</sup> The historic high groundwater level beneath the project site is reported as 50 feet below the existing ground surface.<sup>41</sup> Excavations of up to 35 feet below the existing ground surface may be required during project construction.<sup>42</sup> Given the depth

<sup>37</sup> AECOM, 2018. Preliminary Geotechnical Report for Murphy's Bowl LLC. Page 11.

<sup>38</sup> AECOM, 2018. Preliminary Geotechnical Report for Murphy's Bowl LLC. Page 12.

<sup>39</sup> National Oceanic and Atmospheric Administration, 2018. What is Subsidence? Available: <https://oceanservice.noaa.gov/facts/subsidence.html>. Accessed on September 25, 2018.

<sup>40</sup> AECOM, 2018. Preliminary Geotechnical Report for Murphy's Bowl LLC. Page 11.

<sup>41</sup> AECOM, 2018. Preliminary Geotechnical Report for Murphy's Bowl LLC. Page 17.

<sup>42</sup> AECOM, 2018. Preliminary Geotechnical Report for Murphy's Bowl LLC. Page 23.

of excavation and the depth of groundwater, it is expected that no dewatering would occur during construction of the Proposed Project. The risk of subsidence is minimal.

Lateral spread displacement can occur during strong earthquakes, especially when conditions such as free-face, sloping ground surfaces and liquefiable layers are present. The project site does not have unsupported free-face, sloping ground surfaces, and has a very low susceptibility of liquefaction.<sup>43</sup> The risk of lateral spreading is minimal.

Other unstable soil conditions, such as expansive soil, landslides, and liquefaction are discussed throughout this section. The Proposed Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Proposed Project, and would not result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. The impacts would be less than significant.

### ***Located on Expansive Soil***

Expansive soils are fine-grained soils that can undergo a significant increase in volume with an increase in water content and a significant decrease in volume with a decrease in water content. Changes in the water content of an expansive soil can result in severe distress to structures constructed upon the soil. The project site includes areas that are underlain by clayey soils that could exhibit expansion potential when not properly mitigated.<sup>44</sup> The structural elements of the Proposed Project would be required to undergo appropriate design-level geotechnical evaluations prior to final design and construction. Implementing the regulatory requirements of the California Building Code (CBC), County and City ordinances, the CGS Guidelines for Evaluating and Mitigating Seismic Hazards in California, and ensuring all buildings and structures are constructed in compliance with the law is the responsibility of the project engineers and building officials. The impact would be less than significant.

### ***Soils Incapable of Adequately Supporting the Use of Septic Tanks or Alternative Wastewater Disposal Systems***

The Proposed Project would not provide wastewater service via septic tank or alternative wastewater disposal systems. All proposed sewer impacts would involve connections to existing service systems, as discussed in section 3.14, Utilities and Service Systems. There would be no impact.

## **Hydrology and Water Quality**

This Draft EIR includes a section on Hydrology and Water Quality that considers potential effects of the Proposed Project on water quality standards and waste discharge requirements, groundwater supplies and recharge, drainage patterns and erosion, stormwater drainage systems, and levee or dam failure. However, as discussed below, issues related to the placement of housing or structures within a 100-Year Flood Hazard Area and inundation by seiche, tsunami, or

<sup>43</sup> AECOM, 2018. Preliminary Geotechnical Report for Murphy's Bowl LLC. Page 17.

<sup>44</sup> AECOM, 2018. Preliminary Geotechnical Report for Murphy's Bowl LLC. Page 11.

mudflow would not be affected and are not further addressed in this Draft EIR. Additionally, as described in *CBIA v. BAAQMD*, an agency is only required to analyze the potential impact of existing or potential environmental hazards on future residents if the project would exacerbate those existing environmental hazards or conditions. Ordinary CEQA analysis is therefore concerned with a project's impact on the environment, rather than with the environment's impact on a project and its users or residents. Thus, with respect to flooding, seiche, tsunami, or mudflow hazards, the City is not required to consider the effects of bringing people or structures into an area where such hazards exist, because the project itself would not increase or otherwise affect the geologic conditions that create those risks. Nonetheless, in order to provide a complete picture of the Proposed Project, these impacts are addressed below.

### ***Placement of Housing within a 100-Year Flood Hazard Area***

Implementation of the Proposed Project would not result in the construction of housing. The project site is not within a 100-year flood hazard area as mapped on the Flood Insurance Rate Map by the Federal Emergency Management Agency.<sup>45</sup> The closest mapped flood hazard area is 2.1 miles slightly to the northwest; this mapped area is a 500-year flood zone. Therefore, the Proposed Project would not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map. There would be no impact.

### ***Placement of Structures within a 100-Year Flood Hazard Area***

As discussed above, the project site is not within a 100-year flood hazard area as mapped on the Flood Insurance Rate Map by the Federal Emergency Management Agency.<sup>46</sup> The closest mapped flood hazard area is 2.1 miles slightly to the northwest; this mapped area is a 500-year flood zone. Therefore, the Proposed Project would not place structures within a 100-year flood hazard area which would impede or redirect flood flows. There would be no impact.

### ***Flooding as a Result of the Failure of a Levee or Dam***

Flooding from dam failure or levees can result from natural and human causes, including earthquakes, erosion, and rapidly rising floodwater during heavy storms. Dam or levee failure can potentially cause loss of life, property or infrastructure damage, and/or displacement of persons residing in the inundation path. The nearest surface water to the project site is Dominguez Channel, located approximately one-mile south of the project site. The Dominguez Channel does not include levees, and in the event of flooding, is located downstream of the project site. According to the California Division of Safety of Dams (DSOD), there are 90 dams in Los Angeles County, however none are located within the City of Inglewood.<sup>47</sup> The nearest dam to the project site is the Greystone Reservoir Dam, located approximately 11 miles north of the

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<sup>45</sup> AECOM, 2018. Preliminary Geotechnical Report for Murphy's Bowl LLC. Page 12.

<sup>46</sup> AECOM, 2018. Preliminary Geotechnical Report for Murphy's Bowl LLC. Page 12.

<sup>47</sup> California Department of Water Resources Division of Safety of Dams, 2018. *Dams Within Jurisdiction of the State of California – Dams Listed Alphabetically*. Available: <https://water.ca.gov/Programs/All-Programs/Division-of-Safety-of-Dams>. Accessed October 24, 2018.

project site. The Greystone Reservoir was built in 1971 and has a capacity of 19 million gallons of drinking water.<sup>48</sup> If the reservoir were to fail, water would flow in a southerly direction, with the inundation area terminating at Santa Monica Boulevard (approximately 9 miles north of the project site). As the project site is not located within the dam inundation zone, the project site would have no impact related to flooding as a result of the failure of a levee or dam.

### ***Inundation by Seiche, Tsunami, or Mudflow***

A seiche occurs when there is a temporary disturbance or oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank, often as a result of earthquakes or other large environmental disturbances. There are no lakes or reservoirs proximate to the project site, with the nearest being the Morningstar Park Reservoir, approximately 1.1 miles to the northeast of the project site. Risk of inundation by seiche is minimal.<sup>49</sup>

The hazards from tsunamis are relatively low in southern California because of its wide physiographical offshore borderland. There is no immediate danger to Inglewood from this type of natural hazard. If a major tsunami were to strike the southern California region, Inglewood would not suffer any direct damage because it is not a coastal city. The City's elevation ranges from approximately 50 feet to 250 feet above sea level and is located over four miles inland from the Pacific Ocean.<sup>50</sup> Given the project site's distance from the Pacific Ocean, and its general elevation profile, risk of inundation by tsunami is minimal.

Mudflow hazards can occur in areas where there are changes in topography such as near a hillside or cliff. Mudflow can occur as a result of seismic-induced slope instability. The project site and its surrounding area are relatively flat, with gentle slopes from east to west and north to south, depending on the parcel. The project site is not located within an area designated by the State Geologist where previous occurrence of landslide movement has occurred, or where local topographic, geological, geotechnical, and subsurface conditions indicate a potential for permanent ground displacement.<sup>51</sup> Risk of inundation by mudflow is minimal.

The Proposed Project would be subject to inundation by seiche, tsunami, or mudflow. There would be no impacts.

## **Land Use and Planning**

This Draft EIR includes a section on Land Use and Planning that considers potential effects of the Proposed Project on physically dividing an established community and whether or not the Proposed Project would conflict with any applicable land use plan or policy. However, as discussed below, issues related to whether or not the Proposed Project would conflict with any

<sup>48</sup> City of Beverly Hills, 2018. Local Hazard Mitigation Action Plan 2017-2022. Page 176 through 177.

<sup>49</sup> AECOM, 2018. Preliminary Geotechnical Report for Murphy's Bowl LLC. Page 18.

<sup>50</sup> City of Inglewood, Department of Community Development and Housing, 1995. Safety Element of the Inglewood General Plan. Adopted July 1995, p. 51.

<sup>51</sup> AECOM, 2018. Preliminary Geotechnical Report for Murphy's Bowl LLC. Page 11.

applicable habitat conservation plan would not be affected and are not further addressed in this Draft EIR.

### ***Habitat Community Plan or Natural Community Conservation Plan***

The project site is entirely in a disturbed and/or developed condition and is not located within the boundaries of, or in the vicinity of, any habitat conservation plan (HCP) or Natural Communities Conservation Plan (NCCP). The closest designated HCP, the City of Rancho Palos Verdes HCP, is located approximately 10 miles south/southwest from the project site.<sup>52</sup> Since there would be no interaction between the Proposed Project and an approved HCP or NCCP, the Proposed Project would not conflict with the provisions of any adopted conservation plan. There would be no impact.

## **Mineral Resources**

### ***Loss of Availability of a Known Mineral Resource***

The project site is in a Mineral Resource Zone (MRZ) classified as MRZ-1, which covers those areas where available geologic information indicates that little likelihood exists for the presence of significant mineral resources.<sup>53,54,55,56</sup> Although the project site is located within the San Gabriel Production-Consumption Region, the project site is not located within a MRZ-2 zone, which would indicate that significant mineral resources are present.<sup>57</sup> Construction and operation of the Proposed Project would not result in the loss of availability of any known mineral resource that would be of value to the region and the residents of the state. There would be no impact.

### ***Loss of Availability of a Locally Important Mineral Resource***

As discussed above, the project site is located within a MRZ-1 zone, which indicates that there is little likelihood that the project site contains significant mineral resources. The project site is not delineated or designated by the City of Inglewood as a locally important mineral resource

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<sup>52</sup> City of Rancho Palos Verdes, 2004. Natural Communities Conservation Planning Subarea Plan, Figure 2-1. Available: [https://pvplc.org/\\_lands/docs/NCCP.pdf](https://pvplc.org/_lands/docs/NCCP.pdf). Accessed September 24, 2018.

<sup>53</sup> California Department of Conservation, 1982. California Department of Mines and Geology, Mineral Land Classification Map, Aggregate Resources Only, Inglewood Quadrangle, Special Report 143, Plate 4-15. Available: [ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR\\_143/PartIV/](ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_143/PartIV/). Accessed September 25, 2018.

<sup>54</sup> California Department of Conservation, 1982. California Department of Mines and Geology, California Geological Survey, Mineral Land Classification of the Greater Los Angeles Area, Part IV: Classification of Sand and Gravel Resource Areas, San Gabriel Valley Production-Consumption Region, Special Report 143, Part IV. Available: [ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR\\_143/PartIV/](ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_143/PartIV/). Accessed September 25, 2018.

<sup>55</sup> California Department of Conservation, 2010. California Department of Mines and Geology, Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California, Special Report 209, Plate 1: San Gabriel Valley P-C Region Showing MRZ-2 Areas and Active Mine Operations. Available: [ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR\\_209/](ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_209/). Accessed September 25, 2018.

<sup>56</sup> California Department of Conservation, 2010. California Department of Mines and Geology, California Geological Survey, Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California, Special Report 209. Available: [ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR\\_209/](ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_209/). Accessed September 25, 2018.

<sup>57</sup> California Department of Conservation, 2010. California Department of Mines and Geology, Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California, Special Report 209, Plate 1: San Gabriel Valley P-C Region Showing MRZ-2 Areas and Active Mine Operations. Available: [ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR\\_209/](ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_209/). Accessed: September 25, 2018.

recovery site. Construction and operation of the Proposed Project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. There would be no impact.

## **Public Services**

This Draft EIR includes a section on Public Services that considers potential effects of the Proposed Project on fire protection and emergency medical services, police protection, and parks and recreation services. However, as discussed below, issues related to school services and facilities would not be affected and are not further addressed in this Draft EIR.

## **School Services**

The Proposed Project would develop entertainment-related uses on a mostly undeveloped project site. No residential uses are permitted on the project site due to its location within a Federal Aviation Administration (FAA) Runway Safety Area, and therefore there would be no direct increase of the student population associated with new residences. The Proposed Project would employ a total of 439 permanent employees, who would likely come from the larger Los Angeles region and are not anticipated to move to the area, thereby indirectly increasing enrollment at nearby schools. It is not anticipated that event or temporary employees would move to the area for employment, thereby moving their children into new schools. However, it is possible, but unlikely, that a small number of Project employees would put their children into school near the project site. This would result in a negligible increase in students, if any at all, and would not substantially affect school services and facilities within the City of Inglewood. The Proposed Project would not remove existing residential uses or a school site, and therefore would not reduce the student population or availability of school facilities. The Alternate South Prairie Avenue Access Variant, if implemented, would remove four residential units. However, the removal of those units would likely result in the removal or relocation of only a few students in the school district, a potential negligible decrease in enrollment. School services and facilities would not be affected by the Proposed Project. There would be no impact.

## **Utilities and Service Systems**

This Draft EIR includes a section on Utilities and Service Systems that considers potential effects of the Proposed Project on wastewater treatment requirements, new or expanded stormwater drainage facilities, water supplies, wastewater treatment capacity, landfill capacity, and whether or not the Proposed Project would conflict with solid waste regulations. However, as discussed below, issues related to new or expanded water or wastewater treatment facilities would not be affected and are not further addressed in this Draft EIR.

## ***Construction of New Water or Wastewater Treatment Facilities and Expansion of Existing Facilities***

As discussed in section 3.14, Utilities and Service Systems, the Proposed Project would include all new infrastructure to serve the project site, including water, wastewater, and storm drainage infrastructure. The Proposed Project would also remove the City-owned Water Well #6 and

would construct a new well, Water Well #8. Water Well #8 would include water pumps and associated infrastructure similar to Water Well #6. These impacts are analyzed as part of the Proposed Project.

The Golden State Water Company would be able to provide water to the project site from existing water facilities within Century Boulevard, West 103<sup>rd</sup> Street, South Prairie Avenue, and South Doty Avenue.<sup>58</sup>

The average increase in wastewater flow expected to be generated from the Proposed Project is expected to be 251,438 gallons per day (gpd).<sup>59</sup> The wastewater generated by the Proposed Project would be treated at the Joint Water Pollution Control Plant, which has a maximum treatment capacity of 400 million gallons per day (mgd). The Joint Water Pollution Control Plant would have sufficient capacity to treat all wastewater generated from the Proposed Project.<sup>60</sup>

### 3.0.4 Cumulative Projects

Section 15130 of the California Environmental Quality Act Guidelines (CEQA Guidelines) requires that the EIR discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable. Cumulative impacts are defined in section 15355 of the CEQA Guidelines as "an impact which is created as a result of the combination of a project evaluated in the EIR together with other projects causing related impacts." As defined in State CEQA Guidelines section 15355, a cumulative impact consists of an impact that is created as a result of the combination of a project evaluated in the EIR together with other past, present and reasonably foreseeable projects causing related impacts. As identified in section 15130(b), the discussion of cumulative impacts shall "reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone."

Either of the following are necessary to an adequate discussion of significant cumulative impacts:

- A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or
- A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing the cumulative effect.

An analysis of cumulative impacts follows the project-specific impacts and mitigation measures evaluation in each section. An introductory discussion that identifies the cumulative impact methodology and defines the cumulative context being addressed in each respective analysis (e.g., the South Coast Air Basin) is included at the beginning of the cumulative impact analysis in each technical section. In some instances, a project-specific impact may be considered less than

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<sup>58</sup> Golden State Water Company, 2017. Will Serve Letter for 17 Acres Development between Century Blvd to the north, 103<sup>rd</sup> Street to the south, Prairie Ave to the west and Doty Ave to the east. November 13.

<sup>59</sup> County Sanitation Districts of Los Angeles County, 2018. Will Serve Letter for Project Condor. January 19.

<sup>60</sup> County Sanitation Districts of Los Angeles County, 2018. Will Serve Letter for Project Condor. January 19.

significant, but may be determined to be potentially significant when considered in combination with other cumulative development of the surrounding area or in combination with regional growth projections. In some instances, a potentially significant impact may result on a project-level but would not result in a considerable contribution to a significant cumulative impact. The cumulative impacts analysis is formatted the same as the project-specific impacts, as shown above in section 3.0.2, Section Format. **Table 3.0-1**, Cumulative Projects List, provides a list of all past, present, and reasonably foreseeable projects.

To support the environmental analysis of the proposed IBEC project, the City assembled a list of cumulative projects. Projects on this list consist of development projects within the City or other identified surrounding jurisdictions which have a pending development application, are approved, or are under construction. Certain plan documents are included on the list if they have applications pending for specific projects proposed within the plan area. CEQA Guidelines section 15125(a) states that the appropriate baseline is established when the Notice of Preparation (NOP) is published. The City published the NOP in February 2018. Following publication of the NOP, and consistent with guidance provided in CEQA Guidelines section 15130(b), the City began identification of reasonably foreseeable projects to include in the cumulative environmental analysis. Projects on this list consist of development projects within Inglewood and identified surrounding jurisdictions which have a pending development application, are approved, are under construction, and/or would be a significant traffic generator. Certain plan documents are included on the list if they have applications pending for specific projects proposed within the plan area.