

SECTION I.

This Initial Study evaluates the environmental impacts of the City of Inglewood Housing Element. The State of California has mandated that all local governments (both cities and counties) must prepare and maintain a housing element to identify strategies to conserve, rehabilitate, and provide housing to meet the existing and projected needs of the community. The City of Inglewood Housing Element fulfills the requirements of the State of California Planning and Zoning Laws and the regulations of Sections 65580 through 65589.5 of the California Government Code. The draft Housing Element is considered to be a project pursuant to the California Environmental Quality Act (CEQA). As part of the review of the draft Housing Element, the City of Inglewood must approve a Negative Declaration or other environmental document to ensure that decision-makers and the public understand the environmental implications of the draft Housing Element prior to its approval.

The City of Inglewood Housing Element of the Comprehensive General Plan identifies and established the City's policies with respect to meeting the needs of existing and future residents. It establishes policies that will guide the City decision-making process and sets forth programs and an action plan to implement its housing goals in the next seven years. These commitments are in furtherance of the statewide housing goal of "early attainment of decent housing and a suitable living environment for every California family," as well as a reflection of the concerns unique to the City of Inglewood. This Initial Study has evaluated each of the issues contained in the checklist provided in Section III of this document.

This update must be reviewed and certified by the State of California Housing and Community Development (HCD) Department in order for the Housing Element to be in compliance with state law.

The authority to determine housing needs for the various income groups for cities within the Southern California region has been delegated to the Southern California Association of Governments (SCAG), pursuant to Section 65584 of the Government Code. The SCAG prepared a Regional Housing Needs Assessment (RHNA) that is applicable to all Southern California Cities, including Inglewood. The RHNA housing needs are categorized according to the following income groups:

- The Extremely Low Income households are those whose income does not exceed 30% of the median household income for the greater Los Angeles area;
- The Very Low Income households are those whose income does not exceed 50% of the median household income for the greater Los Angeles area;
- The Low Income households earn from 51% to 80% of the median;
- The Moderate Income groups earn from 81% to 120% of the median; and,
- The Above Moderate households earn over 120% of the median income. SCAG's RHNA estimated the seven-year future housing construction need for Inglewood at 1,658 units. During this planning period, beginning in 2006 and continuing into

2014, a total of 2,485 are identified as being required to meet and exceed Inglewood’s RHNA units.

2008-2014 RHNA New Housing Allocation for Inglewood						
	Very Income <50% Median	Low of Income <80% Median	Low of Income 100% 120% Median	Moderate Income to of >120%	Above Moderate Income >120%	Total All Incomes
No. of Units Percent of Total Units to be Provided	398	255	278	727	1,658	100%
	24.0%	15.4%	16.8%	43.8%		

These housing units totals are goals and therefore, based on economic and other conditions may not get completed.

SECTION II.

The following is an overview of the City’s residential zoning designations, density and residential development standards. The standards are intended to enhance the quality of life in residential zones. The Inglewood Municipal Code requires a minimum of 6,000 square feet of lot area for the creation of new residential lots. However, under certain circumstances the Municipal Code does allow a minimum residential lot size of 5,000 square feet. Additionally, all residential zones allow single-family residences.

The R-1(One-family Residential) zone allows for the development of a single-family residence per lot. The maximum height limit for a single-family home is two and one-half stories and it cannot exceed thirty-five feet. The minimum front and rear yard setback is 25 feet. The side yards can be 10% of the lot width, but cannot be less than three feet and need not be more than five feet. However, the front setback can be 20 feet under certain circumstances.

The R-1Z (One-family Zero Lot Line Residential) zone allows for the development of a single-family residence per lot. The R-1Z zone is intended to establish regulations for comprehensively planned single-family land and subdivisions that have zero side yard setbacks. The maximum height limit for single-family homes shall not exceed two and one-half stories and thirty-five feet. The minimum front and rear yard setbacks are 20 and 16 feet, respectively. In this zone a residence can have a zero side yard setback on one side and provide at least a 10-foot side yard on the open (other) side.

The R-1½ (Limited Two-family Residential) zone allows two-family dwellings per every 10,000 square feet of lot area, provided that the dwellings and all accessory buildings shall, together, cover not more than 60% of the total area of an interior lot, and not more than 70% of the total area of a corner lot. The maximum height limit for R-1½ zone structures cannot exceed one-story or twenty feet. The minimum front and rear yard setbacks are 25 feet. However, the front setback can be 20 feet under certain circumstances. The side yards can be 10% of the lot width, but cannot be less than three feet and need not exceed five feet.

The R-2 (Limited Multiple-family Residential) zone allows a total of two units for the first 5,000 square feet of lot area. For every additional dwelling unit above two there must be an additional minimum lot area of 3,000 square feet. No building in the R-2 zone shall exceed two and one-half stories in height or thirty-five feet. The minimum front and rear yard setback(s) in the R-2 zone is 20 and 25 feet, respectively. The minimum side yard setbacks can be 10% of the lot width, but cannot be less than three feet and need not exceed five feet.

The R-2A (Limited Multiple-family Residential) zone allows a total of two units for the first 5,000 square feet of lot area. For every additional dwelling unit above two there must be an additional minimum lot area of 4,000 square feet. No building in the R-2A zone shall exceed two and one-half stories in height or thirty-five feet. The minimum front and rear yard setbacks in the R-2A zone is 20 and 25 feet, respectively. The minimum side yard setbacks can be 10% of the lot width, but cannot be less than three feet and need not exceed five feet.

The R-3 (Multiple-family Residential) zone allows one unit per 1,400 square feet of lot area for lots less than 12,000 square feet in area or less than 80 feet in width. For lots with a minimum area of 12,000 square feet and a minimum width of 80 feet, the density is one unit per 1,100 square feet of lot area. The maximum building height in the R-3 zone is three stories or 40 feet. The minimum front and rear yard setback is 20 feet. The minimum side yard setback is seven feet (10 feet for three-story buildings).

The R-4 (Multiple-family Residential) zone allows one unit per 1,250 square feet of lot area for lots less than 12,000 square feet in area or less than 80 feet in width. For lots with a minimum area of 12,000 square feet and a minimum width of 80 feet, the density is one unit per 800 square feet of lot area. The maximum building height in the R-4 zone is four stories or 52 feet. The maximum building height can be six stories or 75 feet if the lot has a minimum area of 12,000 square feet and a minimum width of 80 feet. The minimum front and rear yard setbacks are 15 feet. The minimum side yard setback is seven feet for buildings not more than two and one-half stories in height. For a building three or more stories in height, the side yard must be increased three feet for each story over two.

When built in conformance with the R-3 zone provisions the R-M zone allows one unit per 1,400 square feet of lot area for lots less than 80 feet in width. For lots with a

minimum area of 12,000 square feet and a minimum width of 80 feet, the density is one unit per 1,100 square feet of lot area. The maximum building height in the R-3 zone is three stories or 40 feet. The minimum front and rear yard setback(s) is 20 feet. The minimum side yard setback is seven feet (10 feet for three-story buildings).

Residential and commercial uses can be built in the same structure on R-M zoned lots and must adhere to the following:

- (1) They must be located in a structure at least four stories in height, but it cannot exceed six stories or 75 feet.
- (2) They must have a minimum front yard setback of 15 feet, a minimum rear yard setback of 20 feet, and minimum side yard setbacks of 10 feet. There is no minimum density requirement for mixed use development that has a minimum of four stories. However, main and accessory buildings cannot cover more than 60% of the lot.

This Initial Study is based on an Environmental Checklist Form, as suggested in Section 15063 (d)(3) of the State CEQA Guidelines. The Form is found in Section III of this Initial Study. It contains a series of questions about the proposed project for each of the listed areas. The Form is used to evaluate whether or not there are any significant environmental effects associated with implementation of the proposed project.

Following the Form, in Section IV is an explanation for each answer on the Form. The Form and accompanying evaluation of the responses provide the information and analysis upon which the City may make its determination as to whether or not an EIR may be required for the project. The Form is used to review the potential environmental effects of the proposed project for each of the following areas:

EXISTING DOCUMENTS TO BE INCORPORATED BY REFERENCE

Section 15150 of the State CEQA Guidelines permits an environmental document to incorporate by reference other documents that provide relevant data. The documents outlined in this section are hereby incorporated by reference, and the pertinent material is summarized throughout this Initial Study, where that information is relevant to the analysis impacts of the project. Any document incorporated by reference is available for review at the Planning Division counter:

City of Inglewood
One Manchester Boulevard
Fourth Floor
Inglewood, CA 90301

References:

Draft City of Inglewood Housing Element Update, December 2009.
City of Inglewood Comprehensive General Plan Elements

**Initial Study and Negative Declaration
City of Inglewood 2008-2014 Housing Element
December 2009**

Governor's Office of Planning and Research (OPR) *Preliminary Draft CEQA Guideline Amendments for Greenhouse Gas Emissions*, January 8, 2009

City of Inglewood Storm Water Management and Discharge Control Rules and Regulations and the Inglewood Stormwater Management Plan (SWMP).
California Building Code and City of Inglewood Building Division staff
California Fire Code and Los Angeles County Fire Department staff
State of California Hazardous Waste & Substances List
City of Inglewood Municipal Code
USGS Map Showing Faults and Earthquake Epicenters in Inglewood, CA

SECTION III.

EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Potentially Significant Unless Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from an earlier analysis may be cross-referenced).
- 5) Earlier analysis may be used where, pursuant to the tiring, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c) (3) (d). In this case, a brief discussion should identify the following:
 - (a) Earlier Analysis Used. Identify and state where they are available for review.
 - (b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - (c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were

incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The analysis of each issue should identify: (a) the significance criteria or threshold used to evaluate each question; and (b) the mitigation measure identified, if any, to reduce the impact to less than significance.

SECTION IV.

Explanation of Study Checklist Responses

1. Geology and Soils

- A. Expose people or structures to 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? Refer to Division of Mines and Geology Special Publication 42.**

Impact Adequately Analyzed in this Initial Study and previous environmental studies. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The law requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults

Additionally, the loss of habitat for one or more California species of special concern and candidates for Federal listing would not occur and would therefore also be less than significant. Project implementation would not have a substantial adverse effect on any species and to issue appropriate maps. ["Earthquake Fault Zones" were called "Special Studies Zones" prior to January 1, 1994.] The City of Inglewood is affected by a State-established Earthquake Fault Zone. The city is located within two geomorphic provinces: the southwestern portion of the Transverse Ranges, controlled by the effects of large flat-lying basins with generally east-west trending mountains and valleys and the northern limits of the Peninsula ranges that is controlled by a series of north-south trending fault zones such as the Newport-Inglewood and San Andreas Faults. The residential development anticipated by the Housing Element could expose people or structures to adverse effects involving fault rupture. The buildout would expose more people to the effects of geological hazards with the potential to impact Inglewood, including seismically induced surface rupture.

However, the policies and programs contained in the Inglewood General Plan are expected to mitigate the impacts from seismic-related hazards (i.e., fault rupture) to a less than significant level. The proposed Housing Element was considered in the general Plan EIR analysis, since additional residential development was assumed. As such, exposure of people or structures to potential substantial adverse effects involving fault rupture was anticipated in the GPEIR. Implementation of the proposed Project would be consistent with the analysis presented in the GPEIR, and would result in no greater impacts than previously identified. Compliance with the GPEIR mitigation measures, which establish requirements for site-specific geologic and soils studies, and

use of the most current professional standards in building design, would reduce potential impacts to less than significant.

Mitigation Program: No mitigation is required.

B. Strong seismic ground shaking?

Impact Adequately Analyzed in the original GPEIR and Safety Element. The City is located within a seismically active region of southern California. Regional faults, including the Newport/Inglewood Fault, and the Sierra Madre/San Fernando/Santa Susana Fault, among others, are potential sources of ground shaking within the City. The City would experience ground shaking from earthquakes generated along these faults. The intensity of ground shaking would depend upon the magnitude of the earthquake, distance to the epicenter, and the geology of the area between the epicenter and the City. The residential development anticipated by the Housing Element could expose people or structures to adverse effects involving strong seismic ground shaking. The possibility of moderate to high ground acceleration or shaking in the City may be considered as approximately similar to the Southern California region, as a whole. The GPEIR concluded buildout of the General Plan would expose more people to the effects of geological hazards with the potential to impact Inglewood, including ground shaking. However, the policies and programs contained in the General Plan are expected to mitigate the impacts from seismic-related hazards (i.e., ground shaking) to a less than significant level. The proposed Housing Element was considered in the GPEIR analysis, since additional residential development was assumed. As such, exposure of people or structures to potential substantial adverse effects involving strong seismic ground shaking was anticipated in the GPEIR. Implementation of the proposed Project would be consistent with the analysis presented in the GPEIR, and would result in no greater impacts than previously identified.

Numerous controls would be imposed on future residential development through the permitting process. In general, the City regulates development (and reduces potential seismic impacts) under the requirements of the California Building Code (CBC), the Alquist-Priolo Earthquake Fault Zoning Act, local land use policies, and zoning, and project specific mitigation measures. The effects of ground shaking would be sufficiently mitigated for buildings designed and constructed in conformance with current building codes and engineering standards.

Compliance with project specific building and design measures, which establish requirements for site-specific geologic and soils studies, and use of the most current professional standards in building design, would be required. Therefore, the residential development anticipated by the Housing Element would not expose people or structures to potential substantial adverse effects involving strong seismic ground shaking.

Mitigation Program: No mitigation is required.

C. Seismic-related ground failure, including liquefaction?

Impact Previously Adequately Analyzed as General Plan. Liquefaction occurs when seismic-induced ground shaking causes waterladen, cohesion less soils to form a quicksand-like condition below the ground surface. Subsidence involves settlement of under-consolidated soils that may occur during earthquake shaking. Lurching is the actual displacement or movement of the ground due to the passage of seismic waves. The City is not subject to liquefaction. The City's future housing needs would be accommodated within vacant land and redevelopment. Future residential development anticipated by the Housing Element would not expose people or structures to adverse effects involving liquefaction, subsidence, and/or lurching. Therefore, the residential development anticipated by the Housing Element would not expose people or structures to potential liquefaction.

Mitigation Program: No mitigation is required.

D. Landslides

No impact. Seismically-induced landslides occur in areas where steep slopes, unstable geologic features, and/or or seismic activity combine to upset the force of gravity and cause earth to move down a hillside. The City of Inglewood is a fully urbanized area that does not include large hillsides, steep slopes or unstable geologic features. The City's future housing needs would be accommodated within vacant land and redevelopment. Future residential development anticipated by the Housing Element would not expose people or structures to adverse effects involving seismically-induced landslides.

Mitigation Program: No mitigation is required.

E. Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Clearing and grading for construction associated with future residential developments anticipated by the Housing Element could expose soils to minimal short-term erosion by wind and water, and loss of topsoil. Grading plans for proposed residential developments would include an approved drainage and erosion control plan to minimize the impacts from erosion and sedimentation during grading. Additionally, project sites encompassing an area of one or more acres would require compliance with a National Pollutant Discharge Elimination System (NPDES) permit and consequently the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). Given that future residential developments would be subject to the City's *Water Quality Ordinance*, as well as NPDES requirements for erosion control, grading, and soil remediation, less than significant impacts are anticipated in this regard.

Mitigation Program: No mitigation is required.

F. Be located on expansive soil, as defined in Table 18-1-B of the California Building Code (2001), creating substantial risks to life or property?

Less Than Significant Impact. Expansiveness refers to the potential to swell and shrink with repeated cycles of wetting and drying and is a common feature of fine-grained clayey soils. This wetting and drying causes damage due to differential settlement within buildings and other improvements. The City is underlain by various soils series, with shrink-swell potentials ranging from low to high—generally low. Future residential development anticipated by the Housing Element would therefore not likely be located on expansive soils, creating risk to life or property, unless proper engineering techniques are implemented. Due to the conceptual nature of the future residential development, proposals would require individual assessments of potential geological impacts, including expansion potential. The effects of expansive soils would be sufficiently mitigated for buildings designed and constructed in conformance with current building codes and engineering standards. Compliance with CBC and local Building Division mitigation measures, which establish requirements for site-specific geologic and soils studies, and use of the most current professional standards in building design, would be required. Therefore, the residential development anticipated by the Housing Element would result in less than significant impacts involving expansive soils.

Mitigation Program: No mitigation is required.

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

No Impact. The City's Public Work's Department oversees the local sanitary sewer collection system. Sewers are available throughout the City for the disposal of wastewater, thus, use of septic tanks or alternative wastewater disposal systems would not occur.

Mitigation Program: No mitigation is required.

2. Air Quality

A. Substantial air emissions or deterioration of ambient air quality?

Less than a significant impact. The Housing Element update, as a policy document, will not impact any air quality issues. The Housing Element anticipates an increase of approximately 1,658 units for the City's Regional Housing Need Allocation (RHNA) number of units through 2014. Population growth is anticipated to be incremental and would occur gradually as individual projects are approved by the City. The impacts to air quality from these additional units will be analyzed as specific development projects are reviewed by the City.

In reviewing this section, as well as other development based sections of this initial study, it is important to note that the proposed Housing Element does not include any changes to land use designations, zoning classifications, building heights and intensities or residential densities.

An action or project will normally have a significant adverse environmental impact on air quality, if it results in any of the following:

- The project results in a conflict with, or obstructs the implementation of, the applicable air quality plan;
- A violation of an air quality standard or contribute substantially to an existing or projected air quality violation;
- A cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard;
- The exposure of sensitive receptors to substantial pollutant concentrations; or
- The creation of objectionable odors. The South Coast Air Quality Management District (SCAQMD) has also established daily emissions thresholds for a number of criteria pollutants. These thresholds include: 550 pounds of carbon monoxide (CO), 55 pounds of nitrogen oxides (NO_x), 150 pounds of sulfur dioxide (SO_x), 55 pounds of reactive organic gases (ROG), and 150 pounds of PM₁₀ particulates. These thresholds apply to both short term (construction-related) emissions and long-term (operational) emissions.

Localized significance thresholds (LSTs) represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area. The cleaner the air is in a local area, the greater emissions increment it can afford without causing or contributing to an exceedance of the most stringent ambient air quality standard. If the existing air quality is not yet in compliance with the air quality standards, all areas are subject to generally equivalent LSTs. LSTs apply to projects that are less than five acres in size. Public agencies can use LST methodology and mass rate look-up tables by source receptor area (SRA) to determine whether or not a project may generate significant adverse localized air quality impacts. LSTs are only applicable to the following criteria pollutants: oxides of nitrogen (NO_x), carbon monoxide (CO), and particulate matter less than 10 microns in aerodynamic diameter (PM₁₀). LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. For PM₁₀ LSTs were derived based on requirements in SCAQMD Rule 403 (Fugitive Dust).

The draft Housing Element promotes the development of new housing as a means to meet the City's RHNA. Air quality emissions that are anticipated to occur were evaluated as part of the development of the RHNA by the Southern California Association of Governments and as a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

The draft Housing Element designates adequate sites for development that could potentially accommodate any unmet portion of the RHNA through 2014. Since the housing assessment in the RHNA is determined by SCAG, the proposed project would accommodate increases in population based on SCAG's demographic projections. Also, development as proposed to meet the RHNA goals is based on the construction of housing units approved as part of the Hollywood Specific Plan, which evaluated air quality impacts for the area and deterioration of ambient air quality. The project would not cause substantial air emissions or deterioration of ambient air quality and would be consistent with the AQMP because it is based on demographic projections for the City of Inglewood from which SCAQMD creates the regional emissions inventory. Therefore, impacts would not occur.

B. Would the project create objectionable odors affecting a substantial number of people?

No Impact. The SCAQMD's CEQA Air Quality Handbook identifies those uses that will typically create odors that, in turn, could generate complaints. These uses include agricultural activities, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding operations. The draft Housing Element promotes the development of new housing as a means to meet the City's RHNA. No odors are anticipated once the units are occupied. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

Mitigation Program: No mitigation is required.

C. Would the project conflict with or obstruct implementation of the applicable air quality plan?

No Impact.

The City of Inglewood is located within the southbay area of the South Coast Air Basin. The basin covers a 6,600-square-mile area within Los Angeles and Orange Counties, Riverside County, and San Bernardino County. Air quality in the basin is monitored by the South Coast Air Quality Management District (SCAQMD) at various monitoring stations located throughout the area. The adoption and implementation of the draft Housing Element will result in operational emissions which will exceed SCAQMD thresholds. The RHNA housing need (1,658 units) represents a mandate required by the State of California as part of the RHNA's implementation.

The City is obligated under State law, to fulfill the RHNA requirements that have been assigned to the City. As part of the RHNA's development, SCAG relied on growth projections developed as part of the Regional Transportation Plan (RTP). These growth projections were evaluated in the environmental studies prepared for both the RHNA and RTP. The Inglewood Draft Housing Element will not introduce any additional impacts beyond that previously anticipated under the City of Inglewood General Plan, the Hollywood Park Specific Plan, the village Specific Plan, the Inglewood Business Park Specific Plan or the aforementioned regional plans.

The City is obligated under State law, to fulfill the RHNA requirements that have been assigned to the City. As part of the RHNA's development, SCAG relied on growth projections developed as part of the Regional Transportation Plan (RTP). These growth projections were evaluated in the environmental studies prepared for both the RHNA and RTP. The Inglewood Draft Housing Element will not introduce any additional impacts beyond that previously anticipated under the City of Inglewood General Plan, the Hollywood Park Specific Plan, or the aforementioned regional plans. As a result, no significant adverse impacts are anticipated. As a result, no significant adverse impacts are anticipated.

Mitigation Program: No mitigation is required.

D. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

No Impact. The potential short-term air quality impacts associated with the residential development include construction equipment emissions, vehicle emissions, emissions from power generation, and dust from demolition, excavation, grading, and debris transport. As indicated previously, the long-term operational impacts, related to both stationary and mobile (vehicle) emissions, will occur following occupancy. The Housing Element addresses housing units as a collective whole, no emission calculations are necessary in the preparation of this document. Notwithstanding, residential development anticipated by the Housing Element could violate air quality standards or contribute substantially to an existing or projected air quality violation.

The City is obligated under State law, to fulfill the RHNA requirements that have been assigned to the City. As part of the RHNA's development, SCAG relied on growth projections developed as part of the Regional Transportation Plan (RTP). These growth projections were evaluated in the environmental studies prepared for both the RHNA and RTP. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

Climate Change

California is a substantial contributor of global greenhouse gases, emitting over 400 million tons of CO₂ a year. Climate studies indicate that California is likely to see an increase of three to four degrees Fahrenheit over the next century. Methane is also an important greenhouse gas that potentially contributes to global climate change.

Greenhouse gases are global in their effect, which is to increase the earth's ability to absorb heat in the atmosphere. As primary greenhouse gases have a long lifetime in the atmosphere, accumulate over time, and are generally well mixed, their impact on the atmosphere is mostly independent of the point of emission. The impact of anthropogenic activities on global climate change is apparent in the observational record. Air trapped by ice has been extracted from core samples taken from polar ice sheets to determine the global atmospheric variation of CO₂, methane, and nitrous oxide from before the start of the industrialization (approximately 1750), to over 650,000 years ago. For that period, it was found that CO₂ concentrations ranged from 180 parts per million (ppm) to 300 ppm. For the period from approximately 1750 to the present, global CO₂ concentrations increased from a pre-industrialization period concentration of 280 ppm to 379 ppm in 2005, with the 2005 value far exceeding the upper end of the pre-industrial period range.

The Intergovernmental Panel on Climate Change (IPCC) constructed several emission trajectories of greenhouse gases needed to stabilize global temperatures and climate change impacts. It concluded that a stabilization of greenhouse gases at 400 to 450 ppm carbon dioxide-equivalent concentration is required to keep mean global warming below 2°C, which in turn is assumed to be necessary to avoid dangerous climate change. Regulations and Significance Criteria California Governor Arnold Schwarzenegger issued Executive Order S-3-05 in June 2005, which established the following greenhouse gas emission reduction targets:

- 2010: Reduce greenhouse gas emissions to 2000 levels
- 2020: Reduce greenhouse gas emissions to 1990 levels
- 2050: Reduce greenhouse gas emissions to 80 percent below 1990 levels

AB-32 requires that the California Air Resources Board (CARB) determine what the statewide greenhouse gas emissions level was in 1990, and approve a statewide greenhouse gas emissions limit that is equivalent to that level, to be achieved by 2020. CARB has approved a 2020 emissions limit of 427 metric tons of CO₂ equivalents (MTCO₂eq).

Global Climate Change Gasses

The natural process through which heat is retained in the troposphere is called the "greenhouse effect."⁹ The greenhouse effect traps heat in the troposphere through a three-fold process summarized as follows: Short wave radiation emitted by the Sun is absorbed by the Earth; the Earth emits a portion of this energy in the form of long wave radiation; and greenhouse gases in the upper atmosphere absorb this long wave radiation and emit this long wave radiation into space and toward the Earth. This "trapping" of the long wave (thermal) radiation emitted back toward the Earth is the underlying process of the greenhouse effect.

Without the greenhouse effect, the Earth's average temperature would be approximately -18 degrees Celsius (°C) (0° Fahrenheit [°F]) instead of its present 14°C (57°F). The most abundant greenhouse gases are water vapor and carbon dioxide.

Many other trace gases have greater ability to absorb and re-radiate long wave radiation; however, these gases are not as plentiful. For this reason, and to gauge the potency of greenhouse gases, scientists have established a Global Warming Potential (GWP) for each greenhouse gas based on its ability to absorb and re-radiate long wave radiation. The GWP of a gas is determined using carbon dioxide as the reference gas with a GWP of one (1).

Methodology

Per the Attorney General's Office, their recommended General Plan (including the Housing Element) measures will reduce greenhouse gas emissions and the effects of global warming.¹³ Additionally, the Climate Action Team Report to Governor Schwarzenegger at the Legislature (CAT Report) provides "overarching recommendations considered essential by the (Climate Action Team) in meeting the statewide climate change emissions reduction targets" and "lays out a path forward to ensure that California's climate change emission reduction targets are met." The CAT Report identifies strategies designed to reduce California's greenhouse gas emissions and meet the AB 32 goal. Therefore, compliance with all applicable CAT Report strategies and Attorney General's General Plan recommendations would ensure the proposed Housing Element Project would help achieve the AB 32 goal to reduce greenhouse gas emissions for California and would result in a less than significant impact.

The California Air Pollution Control Officers Association (CAPCOA) identifies various approaches to global climate change. The CAPCOA approach utilized in this analysis is identified below:

The emissions associated with a [general plan] are assumed to have a significant impact unless one can arrive at a less-than-significant finding by ...the [methodology] below:

1. Demonstrate that a General Plan (GP) or a Regional Plan (RP) is in Compliance with AB 32:

- For most GPs or RPs this will require demonstration that projected ... emissions will be equal to or less than 1990 emissions.*
- GPs or RPs are expected to fully document 1990 and [future] GHG [greenhouse gas] emission inventories.*
- Projection of ...emissions is complicated by the fact that CARB is expected to promulgate emission reductions in the short term. Until explicit CARB regulations are in place, unmitigated GP ...emission inventories represent business-as-usual scenarios.*
- EIRs for GPs or RPs which demonstrate [future] mitigated emissions are less than or equal to 1990 emissions are considered less than significant.*

Global Climate Change Analysis

Population growth anticipated to occur under the Housing Element, which was anticipated by the General Plan, is expected to result in increased emissions of greenhouse gases, largely due to increased vehicle miles traveled (VMTs), as well as increased energy consumption and waste generation. As discussed previously, increased emissions of greenhouse gases could contribute to global climate change patterns and the adverse global environmental effects thereof. Increased concentrations of greenhouse gas emissions could also potentially conflict with the requirement of AB 32 to reduce Statewide greenhouse gas emissions to 1990 levels by 2020.

Construction Emissions

CEQA does not require an agency to evaluate an impact that is “too speculative,” provided that the agency identifies the impact, engages in a “thorough investigation” but is “unable to resolve an issue,” and then discloses its conclusion that the impact is too speculative for evaluation. (CEQA Guidelines Section 15145, Office of Planning and Research Commentary). Additionally, CEQA requires that impacts be evaluated at a level that is “specific enough to permit informed decision making and public participation” with the “production of information sufficient to understand the environmental impacts of the proposed Project and to permit a reasonable choice of alternatives so far as environmental aspects are concerned.” (CEQA Guidelines Section 15146, Office of Planning and Research Commentary). Pursuant to CEQA Guidelines Section 15146(b):

An EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance or a local general plan should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow.

Construction of future residential new and infill development projects would result in greenhouse gas emissions from the use of construction equipment. However, details of these future construction activities are unknown at this time, and therefore, cannot be quantified. Compliance with General Plan EIR mitigation measures (4.2-1 through 4.2-9) would reduce construction-related emissions to a level below “business as usual.”

Operational Emissions

Area sources include emissions from natural gas combustion, hearth (wood stove/fireplaces), landscaping equipment, consumer products, and architectural coatings. Indirect sources include emissions from energy consumption and water conveyance. Mobile sources include emissions from passenger vehicles and delivery trucks. Typically, mobile sources are the primary contributor of greenhouse gas emissions. However, consistent with the General Plan, the Housing Element would discourage sprawl, encourage infill development, and encourage public transportation.

Moreover, the City’s Municipal Code and General Plan allow for residential development patterns that incorporate energy and resource conservation principles. The City allows for mixed-use development in the C-1 and C-2 Zones and through the development of specific plans. Concentrating higher density housing in close proximity to services and employment centers may reduce the need for the use of private automobiles, encourages the use of public transit, and reduces fuel consumption, which in turn reduce emissions. The City also reviews project proposals for passive solar design through building siting in the Site Plan Review process. Compliance with GP Programs/Policies (for residential zones) and measures would further minimize long-term emissions.

Compliance with the Attorney General’s Recommendations

The California Office of the Attorney General has established recommended measures for projects to mitigate greenhouse gas emissions. According to CEQA Guidelines Section 15002(a)(1), one of the basic purposes of CEQA is to, “Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities.” Senate Bill 97 requires the California Office of Planning and Research (OPR) to develop CEQA Guidelines for analysis and, if necessary, the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions to the Resources Agency by July 1, 2009. Additionally, it is the position of the State Legislature (as expressed in its adoption of AB 32, The California Climate Solutions Act of 2006) that global climate change poses significant adverse effects to the environment of the State of California and the entire world. Additionally, the State Legislature adopted the public policy position that global climate change is, “a serious threat to the economic well-being, public health, natural resources, and the environment of California” (Health and Safety Code Section 38501).

Housing Element Update’s Compliance with the Attorney General’s Recommendations

Attorney General’s Recommended Measures	Compliance with Attorney General’s Recommendations
<p>Housing Element Improve the jobs-housing balance and promote a range of affordable housing choices near jobs, services, and transit.</p>	<p>Compliant. The Housing Element includes policy actions that promote affordable housing choices near jobs, services, and transit. As specified in the Housing Element, it is the City’s policy to provide programs that address the supply of housing for all segments of the population, in order to ensure that Inglewood’s current residents and workforce will have the opportunity to live in the City. Additionally, it is City policy to preserve and improve the quality of life of Inglewood residents through resource efficient design. These design considerations will promote environmental and</p>

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	energy efficiency in both existing and future housing stock. The General Plan's Land Use Element establishes goals and policies that promote affordable housing choices near jobs, services, and transit. It is the City's goal to provide compatible and balanced land uses, which are well maintained or revitalized, provide pleasant environments, and adequately serve present and future populations. Compliance with Land Use policies would be required of future housing development, to Mitigation Program below.
Concentrate mixed use and medium to higher density residential development in areas near jobs, transit routes, shopping areas and recreation.	Compliant. Refer to response above.
Increase density in single-family residential areas located near transit routes or commercial areas. For example, promote duplexes in residential areas and increased height limits of multi-unit buildings on main arterial streets, under specified conditions.	Compliant. Refer to response above.
Encourage transit-oriented developments.	Compliant. Compliance would be required of future housing development, in order to encourage transit.
Impose minimum residential densities in areas designated for transit-oriented, mixed-use development to ensure higher	Compliant. Refer to response above
Designate mixed use areas where housing is one of the required uses.	Compliant. Refer to response above.
Promote infill, mixed use, and higher density development by, for example, reducing developer fees; providing fast track infrastructure loans; and giving preference for infrastructure improvements in these areas.	Compliant. Future housing development would be subject to compliance with Housing Element policies that promote mixed use and higher density development: Provision of Adequate Sites for Housing Development, Policy Expedited Processing for Extremely Low, Very- Low, and Moderate Income Housing Developments, Facilitate Infill Development, Policy Encourage Mixed Use Development, and Policy Continue to process Planned Assembly

	Development Projects that allow increased Density.
Source: State of California Department of Justice, Attorney General's Office, The California Environmental Quality Act, Addressing Global Warming Impacts at the Local Agency Level, updated May 21, 2008.	

The State Legislature has determined that, "the potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the State from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment and an increase in the incidences of infectious disease, asthma and other human health-related problems" and that, "Global warming will have detrimental effects on some of California's largest industries, including agriculture, wine, tourism, skiing, recreational and commercial fishing, and forestry (and)...will also increase the strain on electricity supplies necessary to meet the demand for summer air-conditioning in the hottest parts of the State" (Health and Safety Code Section 38501). These public policy statements became law with the enactment of Assembly Bill 32, Statutes of 2006.

California Governor Arnold Schwarzenegger issued Executive Order S-3-05 in June 2005, which established the following greenhouse gas emission reduction targets:

- 2010: Reduce greenhouse gas emissions to 2000 levels;
- 2020: Reduce greenhouse gas emissions to 1990 levels; and
- 2050: Reduce greenhouse gas emissions to 80 percent below 1990 levels.

AB 32 requires that the CARB determine what the statewide greenhouse gas emissions level was in 1990, and approve a statewide greenhouse gas emissions limit that is equivalent to that level, to be achieved by 2020. The CARB has approved a 2020 emissions limit of 427 metric tons of CO₂ equivalent (CO₂e).¹⁵ By January 2009, CARB must adopt mandatory reporting rules for significant sources of greenhouse gases and also a plan indicating how reductions in significant greenhouse gas sources would be achieved through regulations, market mechanisms and other actions.

It is noted that there are no established quantitative thresholds of significance or methodologies in place to analyze and determine the significance of global climate change with respect to a General Plan. This analysis has been formulated to comply with the purpose and intent of CEQA, as well as the guidance issued from CAPCOA and the California's Attorney General's Office. Consistent with the General Plan, the Housing Element anticipates infill residential and mixed-use development.

Although, the automobile would continue to dominate as the main transportation mode, alternative transportation modes would be promoted through the General Plan's existing policies and implementation measures. The Housing Element would promote a range of affordable housing choices near jobs, services, and transit, which would inherently reduce sprawl and thus total VMTs. The General Plan establishes policies and implementation measures to reduce greenhouse gases by adopting and implementing

the AQMP, encouraging transportation demand management, improving traffic flow, encouraging energy conservation, and reducing work trips. The General Plan and several City Council Ordinances also call for the City to minimize energy use, maximize waste reduction and diversion, and implement water conservation measures. As indicated in the previous table, the proposed Project would be in compliance with the recommended measures and strategies identified by the Attorney General's Office.

Mitigation Program: No mitigation is required.

E. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact. Future residential development associated with the adoption and subsequent implementation of the draft Housing Element will result in both short-term (construction-related) and long-term (operational) terms. As indicated previously, the long-term (operational) emissions for the entire 1,658 unit unmet need will exceed the SCAQMD's daily thresholds. State law requires the City to fulfill the RHNA requirements that have been assigned to the City. As part of the RHNA's development, SCAG relied on growth projections developed as part of the Regional Transportation Plan (RTP). These growth projections were evaluated in the environmental studies prepared for both the RHNA and RTP. Additionally, air quality impacts were evaluated as part of the Hollywood Park Redevelopment project, as subsequently reviewed by SCAG, MTA and SCAQMD for long term operational plans. As a result, the potential cumulative air quality impacts are considered to be less than significant.

Mitigation Program: No mitigation is required.

F. Would the project expose sensitive receptors to substantial pollutant concentrations?

No Impact. Sensitive receptors refer to land uses and/or activities which are especially sensitive to poor air quality. Sensitive receptors typically include homes, schools, playgrounds, hospitals, convalescent homes, and other facilities where children or the elderly may congregate. The City is obligated under State law, to fulfill the RHNA requirements that have been assigned to the City. As part of the RHNA's development, SCAG relied on growth projections developed as part of the Regional Transportation Plan (RTP). These growth projections were evaluated in the environmental studies prepared for both the RHNA and RTP. As a result, no significant adverse impacts on sensitive receptors are anticipated.

Mitigation Program: No mitigation is required.

G. Would the project alter air movement, moisture, or temperature, or cause any change in climate?

No Impact. The future residential development anticipated as part of the draft Housing Element's implementation will not involve the construction of structures of sufficient mass or height to cause wind jetting or heat islands. As a result, no impacts related to this issue are anticipated.

Mitigation Program: No mitigation is required.

3. Water Drainage, Lakes, Bodies of Water

A. Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. As part of Section 402 of the Clean Water Act, the U.S. Environmental Protection Agency (EPA) has established regulations under the National Pollution Discharge Elimination System (NPDES) program to control direct storm water discharges. In California, the State Water Resources Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the Regional Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality. The City of Inglewood is within the jurisdiction of the Los Angeles County RWQCB (LACRWQCB).

Short-Term Construction. The SWRCB adopted NPDES General Permit No. CAS000002, Waste Discharge Requirements (WDRs) for Discharges of Stormwater Runoff Associated With Construction Activity (General Construction Permit). Construction sites with 1.0 acre or greater of soil disturbance or less than 1.0 acre, but part of a greater common plan of development, are required to apply for coverage for discharges under the General Construction Permit by submitting a Notice of Intent (NOI) for coverage, developing a Stormwater Pollution Prevention Plan (SWPPP), and implementing Best Management Practices (BMPs) to address construction site pollutants. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation, but does not include regular maintenance activities. Construction activities from future residential development anticipated by the Housing Element would be subject to compliance with IMC *Water Quality Ordinance*, and NPDES requirements. More specifically, prior to issuance of any Grading or Building Permit, and as part of the future development's compliance with the NPDES requirements, a NOI would be prepared and submitted to the Los Angeles County RWQCB providing notification and intent to comply with the General Construction Permit. Also, a SWPPP would be submitted and approved by the Director of Public Works and the City Engineer for water quality construction activities onsite. A copy of the SWPPP would be made available and implemented at the construction site at all times. The SWPPP is required to outline the source control and/or treatment control BMPs to avoid or mitigate runoff pollutants at the construction

site to the “maximum extent practicable.” Additionally, through the City’s development review process, future residential projects would be evaluated for potential site-specific water quality impacts from construction activities. Compliance with IMC Chapter and NPDES requirements would reduce short-term construction-related impacts to water quality to a less than significant level.

Long-Term Operations. The Municipal Storm Water Permitting Program regulates storm water discharges from municipal separate storm sewer systems (MS4s). The RWQCBs have adopted NPDES storm water permits for medium and large municipalities. Most of these permits are issued to a group of co-permittees encompassing an entire metropolitan area. The LA County RWQCB issued the permit governing the public storm drain system discharges in the south bay from the storm drain systems owned and operated by the Los Angeles County cities and Los Angeles County (collectively “the Co-permittees”). This permit regulates storm water and urban runoff discharges from development to constructed and natural storm drain systems in the City of Inglewood. Among other requirements, the NPDES permit specifies requirements for managing runoff water quality from new development and significant redevelopment projects, including specific sizing criteria for treatment BMPs. Compliance with IMC Chapter 10 and NPDES requirements would reduce long-term impacts to water quality to a less than significant level.

Mitigation Program: No mitigation is required.

B. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Less Than Significant Impact. In compliance with California’s Urban Water Management Planning Act (Act), the City has prepared and adopted its Urban Water Management Plan 2005 (UWMP). The City is dependent on Metropolitan Water District of Southern California (MWD), the California Golden State Water Company for its imported water supplies and also owns/manages four well sites (wells #1, 2, 4 and 6) through the West Coast Basin. The City has six connections to Golden State Water Company and two connections to Metropolitan Water District. Subsequently, the City has purchased water rights from several sources, including Frank Abell, Boise Cascade building Company, Georgia Pacific Corporation, Kaugman, Leo and Sheldon Baer and George R. Murdock. Currently, the City produces its water supply from five active wells and the imported water connections. The SAR Basin is not an adjudicated basin, but rather a managed basin. Each year OCWD evaluates the amount of groundwater that can be taken from the Basin. For the last ten fiscal years, the City has pumped approximately 74 percent of its water from the groundwater supply. The UWMP describes the water demands and future trends in the City. Population projections for Inglewood, according to the UWMP, indicate an increase to about 130,000 persons by 2030, or approximately 11.9 percent from the 2005 population of 114,580 persons. The water demand associated with

future housing could impact groundwater supplies. The UWMP concluded that the City would be 100 percent in meeting water demands through 2030 (i.e., 130,000 persons by 2030). The UWMP also concludes that the City's service area will have sufficient supplies to meet 100 percent of its projected demand for the next 25 years under single dry year and multiple dry year scenarios. The proposed Housing Element was considered in the UWMP analysis, since additional residential development was assumed. As such, potential increases in water demand associated with future housing were anticipated in the UWMP. Implementation of the proposed Project would be consistent with the analysis presented in the UWMP, and would result in no greater impacts to groundwater than previously identified. All future residential development would be subject to compliance with the UWMP's Conservation Programs, which would ensure that future development would incorporate water conservation measures. Therefore, Project implementation would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge.

Mitigation Program: No mitigation is required.

C. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?

Impact Adequately Analyzed in GPEIR. The City of Inglewood is 98 percent built and has an existing stormwater infrastructure. The City's housing needs would be accommodated as infill development and redevelopment, which could increase the amount of impervious surfaces, and potentially alter existing drainage patterns, thereby increasing runoff volumes and velocities. Increased runoff volumes and velocities could create nuisance flooding in areas with inadequate drainage facilities. General Plan implementation would increase the amount of runoff generated, however, the impacts would be less than significant. Additionally, implementation of the proposed Project would be consistent with the analysis presented in this analysis, and would result in no greater impacts than previously identified. It is further noted, there are a limited number of remaining vacant parcels and future housing development would occur primarily as infill and redevelopment. Future residential development would be required to ensure project-specific and citywide drainage systems have adequate capacity to accommodate their increased flows, if any. Compliance with project specific site plan, public works or building code measures would ensure new development projects are designed to result in less than significant impacts related to the drainage system capacity.

Mitigation Program: No mitigation is required.

D. Create or contribute runoff which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

No impact. Refer to previous response.

Mitigation Program: No mitigation is required.

E. 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?

No impact. The Federal Emergency Management Agency (FEMA) prepares and maintains Flood Insurance Rate Maps (FIRMs), which show the extent of Special Flood Hazard Areas (SFHAs) and other thematic features related to flood risk, in participating jurisdictions. To receive insurance benefits in the event of flood, participating agencies must recognize these official flood boundaries and establish appropriate land use policy for the flood zones. There are no portions of the City that are located within the 100-year flood zone where the potential for private property flooding exists. The 100-year flood (one percent annual chance flood), also known as the base flood, is the flood that has a one percent chance of being equaled or exceeded in any given year. area. Therefore the Project would not result in impacts.

Mitigation Program: No mitigation is required.

F. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Impact less than Significant.

The City is not located within a dam inundation areas. Therefore, residential development anticipated by the Housing Element would not expose people or structures to risk involving flooding as a result of dam failure. Thus, no impacts are anticipated in this regard.

Mitigation Program: No mitigation is required.

G. Inundation by seiche, tsunami, or mudflow?

No impact. A seiche is a surface wave created when a large body of water is shaken, often by an earthquake. Dams located in seismically active regions may overtop due to seiching during seismic activity or from seismically-induced landsliding. The resulting disaster could affect downstream communities located in the dam inundation area. A seiching hazard from seismic activity can also occur in storage tanks. As discussed in the pervious response., risk from inundation is not a threat or potential impact to the City. Implementation of the proposed Project would be consistent with the analysis

presented herein, and would result in no greater impacts than previously identified. Thus, no impacts are anticipated in this regard.

Mitigation Program: No mitigation is required.

4. Plant Life

A. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status plant species in local or regional plans, policies, or regulations, or cause the reduction of the numbers of any unique or endangered species of plants?

No Impact. The City's housing needs would be accommodated primarily by redevelopment, since only a limited amount of vacant land permitted for residential development remains. All of the vacant parcels are located in fully urbanized areas that are not habitat for species identified on federal or state habitat listings. Due to the limited number and geographical locations of the remaining vacant parcels and since future housing development would occur primarily as infill and redevelopment, Project implementation would not impact any riparian habitat or other sensitive natural community. Notwithstanding, due to the conceptual nature of the future residential development, individual proposals would require individual assessments of potential impacts to biological resources, or other sensitive natural communities.

Mitigation Program: No mitigation is required.

B. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. There are no federally protected wetlands occurring in the City. The potential housing sites as proposed under the draft Housing Element are located throughout the City and surrounded by urbanized development. Therefore, implementation of the Housing Element would not result in adverse effects in this regard.

Mitigation Program: No mitigation is required.

5. Animal Life

A. Reduction in the numbers of unique or endangered species of animals?

No Impact. There are no federally protected endangered species of animals occurring in the City. Therefore, implementation of the Housing Element would not result in adverse effects in this regard.

Mitigation Program: No mitigation is required.

B. Introduction or increase of any new animals?

No Impact. The City's housing needs would be accommodated primarily by redevelopment, since only a limited amount of vacant land permitted for residential development remains. All of the vacant parcels are located in fully urbanized areas that are not habitat for species identified on federal or state habitat listings, and therefore increases would not occur. Notwithstanding, due to the conceptual nature of the future residential development, individual proposals would require individual assessments of potential impacts to biological resources, or other sensitive natural communities.

Mitigation Program: No mitigation is required.

C. Impact any existing animal habitat?

No Impact. Inglewood is fully developed, and is surrounded by development. Wildlife corridors no longer exist in the City. The loss of wildlife habitat and associated plant and animal species that would not occur with implementation of the Housing Element programs or policies and therefore impacts would be less than significant. Therefore, Project implementation would not interfere with an existing animal habitat.

Mitigation Program: No mitigation is required.

D. 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?

No Impact. Inglewood is fully developed, and is surrounded by development. Wildlife corridors no longer exist in the City. The loss of wildlife habitat and associated plant and animal species that would not occur with implementation of the Housing Element programs or policies and therefore impacts would be less than significant. Therefore, Project implementation would not interfere with a wildlife corridor.

Mitigation Program: No mitigation is required.

6. Noise

A. Increase in existing noise levels?

Less than Significant Impact. The State of California Office of Planning and Research (OPR) Noise Element Guidelines include recommended interior and exterior level standards for local jurisdictions to identify and prevent the creation of incompatible land uses due to noise. The OPR Guidelines describe the compatibility of various land uses with a range of

environmental noise levels in terms of dBA CNEL. The State of California Office of Noise Control has established guidelines for acceptable community noise levels. The State Office of Noise Control defines an outdoor level of 60 dBA CNEL or less as being “normally acceptable” for residential uses. The City of Inglewood Municipal Code (Chapter 5) contains noise criteria that are incorporated into the land use planning process to reduce future noise and land use incompatibilities. This table shown below is the primary tool that allows the City to ensure integrated planning for compatibility between land uses and outdoor noise. All ambient noise measurements shall commence at the base ambient noise levels in decibels within the respective times and zones as follows:

Decibels	Time	Land Use Zone
45 dB(A)	10:00 p.m.— 7:00 a.m.	residential
55 dB(A)	7:00 a.m.— 10:00 p.m.	residential
65 dB(A)	anytime	commercial and uses not specified
75 dB(A)	anytime	industrial

As shown in the previous table, the acceptable interior noise levels for residences are up to 55 A-weighted decibels (dBA) on the community noise equivalent level (CNEL) scale; up to 65 dBA CNEL for schools, churches, libraries, hospitals, and nursing homes; and up to 65 dBA CNEL for office and commercial uses.

City of Inglewood Noise Standards

The City of Inglewood maintains a comprehensive Noise Ordinance within its Municipal Code (Chapter 5) that establishes citywide interior and exterior noise level standards. The City has adopted a number of policies that are directed at controlling or mitigating environmental noise effects. The City’s Noise Ordinance (IMC Chapter 5, *Noise Standards and Regulation*) establishes daytime and nighttime noise standards. The ordinance is intended to control unnecessary, excessive, and annoying sounds.

According to IMC Section 5.25-29; “It shall be unlawful for any person at any location to create any noise, or to allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by that person, when the foregoing causes the noise level, when measured on any other property, to exceed any noise level for the cumulative time periods...”

Pursuant to IMC Section 5-41. Construction of Building and Projects, Noise Regulated. Noise sources associated with construction, repair, remodeling, or grading of any real property shall be exempt from the noise level standards specified by IMC Chapter Five provided they take place between the hours of 7 a.m. and 8 p.m. on any day.

Significance of Changes in Ambient Noise Levels

Changes of 5.0 dBA or greater may be noticed by some individuals and, therefore, may be considered an environmental impact, since under these conditions sporadic complaints may occur. Changes in community noise levels of less than 3.0 dBA are normally not noticeable and are therefore considered less than significant.³⁵ Areas where ambient noise levels exceed the established standards or where sensitive land uses are exposed to levels in excess of 60 dBA. These areas generally occur along freeways, toll roads, arterial and secondary roadways where noise barriers have not been constructed.

Short- and long-term ambient noise level occurrences were evaluated in preparation of the City's Noise Element, an element of the Comprehensive General Plan. Impacts would be less than significant. Implementation of the proposed Project would be consistent with the analysis presented in the Inglewood Noise Element and various housing project environmental studies conducted between 2004 and 2009 and would result in no greater impacts than previously identified. Future residential development would be required to comply with City, State, and Federal noise standards and guidelines. This would ensure that noise levels in Inglewood are maintained within acceptable standards. In addition, residential developments would be analyzed on an individual basis in order to evaluate potential increases in noise levels. Compliance with the provisions of IMC Chapter 5 and project specific noise measures would reduce noise impacts to less than significant levels.

Mitigation Program: No mitigation is required.

B. Exposure of people to serve noise levels or exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than Significant Impact. The Housing Element anticipates the development of additional housing units, the construction and operation of which would generate both short-term and long-term noise impacts. Short term noise impacts could occur during grading and construction. Construction activities have the potential to expose adjacent land uses to noise levels between 70 and 90 decibels at 50 feet from the noise source. Construction activities associated with future residential projects are anticipated to temporarily exceed the City's noise standards. The degree of noise impact would be dependant upon the distance between the construction activity and the noise sensitive receptor. Long-term noise impacts would be associated with vehicular traffic to/from the site (including residents and visitors), outdoor activities, and stationary mechanical equipment on site. To determine noise levels and project-related impacts, specific

information is needed for a particular project. Future residential development would be required to comply with City, State, and Federal guidelines regarding vehicle noise, roadway construction, and noise abatement and insulation standards. This would ensure that noise levels in Inglewood are maintained within acceptable standards that prevent extensive disturbance, annoyance, or disruption. In addition, future residential development would require individual assessments of potential impacts from project-related noise sources. If necessary, mitigation would be required to reduce potential impacts to a less than significant level.

Short-term acoustic impacts are those associated with construction activities necessary to implement the land uses proposed General Plan. Noise impacts may result from the incremental, and in some cases “audible,” increase in noise from General Plan-related traffic volumes on area roadways. Short- and long-term noise impacts would be less than significant. Implementation of the proposed Project would be consistent with the analysis presented in various housing project environmental studies conducted between 2004 and 2009 and would result in no greater impacts than previously identified. Future residential development would be required to comply with City, State, and Federal noise standards and guidelines. This would ensure that noise levels in Inglewood are maintained within acceptable standards. In addition, residential developments would be analyzed on an individual basis in order to evaluate potential increases in noise levels. Compliance with the provisions of IMC Chapter 5 and project specific noise measures would reduce noise impacts to less than significant levels.

Mitigation Program: No mitigation is required.

C. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

No Impact. The draft Housing Element designates adequate sites for potential future development that could accommodate any unmet portion of the RHNA through 2014. Traffic related to the future developments would result in long-term increases in ambient noise levels. However, depending on the size of each development, this increase may be noticeable for some people but may not significantly impact surrounding sensitive uses and may not generate a substantial increase in ambient noise levels. Future development would be subject to CEQA review and consideration of potential noise impacts. Therefore, the impacts regarding noise due to the adoption of the Housing Element would be less than significant.

D. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

No Impact. Refer to Item 6B.

E. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport,

would the project expose people residing or working in the project area to excessive noise levels?

Less than Significant. The Los Angeles International Airport is approximately two miles southwest of Inglewood. The southern area of Inglewood is located in the ALUP height restriction zone. There may be a potential for future projects to be exposed to excessive noise levels. The projects would be required to go through the CEQA process and comply with the ALUP. Impacts regarding excessive noise levels due to the adoption of the Housing Element would be less than significant.

7. Light

Will the proposal produce significant Light or Glare?

Many sources of night lighting and glare occur within the City of Inglewood. Sources of night lighting include street lamps, accent and security lighting on buildings, parking lot lighting, and vehicle headlights at night. Existing substantial sources of night lighting include California I-405 and I-105, the Market at Hollywood Park Shopping Center, the Village Shopping, the Burlington Coat Factory Shopping Center, and parking lots/garages, downtown, commercial signs, the Forum and the Hollywood Park Casino/Racetrack. Additionally, residential, commercial, office, and industrial development located along major arterials also contribute to the overall level of night lighting in the vicinity. Sources of glare during the day result primarily from parked cars located in large parking lots and light reflecting off of window glazing on buildings, particularly tall office buildings.

An incremental increase in the amount of nighttime light and glare would result from new housing development in the City. However, this increase would be within the context of an urbanized area. Nonetheless, the incremental amount of new nighttime light that could be expected to occur throughout the City would not be a substantial change from existing conditions and would not have a substantial effect on any particular area.

The City's existing landscaping setback provisions that apply to residential projects are shown below:

Zone	Front	Side	Rear
R-1 (One-family Residential)	25% setback or 25 feet maximum	10% of side setback or 5 feet maximum	25% of rear setback or 20 feet maximum
R-1Z (One-family Zero Lot Line Residential)	25% setback or 20 feet maximum	0 on one side-10 feet on one side	10 foot minimum to 16 feet maximum
R-1½ (Limited Two-family Residential)	25 feet maximum but less for substandard lots	10% of side setback or 5 feet maximum	25 feet maximum but less for substandard lots

R-2 (Limited Multiple-family Residential)	20% setback or 20 feet maximum	10% of side setback or 5 feet maximum	25% of lot depth or 25 feet maximum
R-2A (Limited Multiple-family Residential)	20% setback or 20 feet maximum	10% of side setback or 5 feet maximum	25% of lot depth or 25 feet maximum
R-3 (Multiple-family Residential)	20% setback or 20 feet maximum	10% of side setback or 5 feet maximum	20% of lot depth or 20 feet maximum
R-4 (Multiple-family Residential)	20% setback or 15 feet maximum	10% of side setback or 5 feet maximum	rear setback not less than 20 feet
R-M (Residential Medical) Zone	20% setback or 20 feet maximum	10 feet minimum	rear setback not less than 20 feet
P-1 (Automobile Parking)	20% setback or 20 feet maximum	10% of side setback or 5 feet maximum	20% of Lot depth of or 20 feet maximum
HPSP	Varies but generally 5-10 feet	5 feet	5 feet

In addition, changes made to State standards (Title 24, parts 1 and 6, Building Energy Efficiency Standards) will improve the quality of outdoor lighting and help to reduce the impacts of light pollution, light trespass, and glare. The standards regulate lighting characteristics such as maximum power and brightness, shielding, and sensor controls to turn lighting on and off. Development proposals submitted to the City shall be required to conform to State standards.

As such, the Housing Element would result in a less than significant impact to light and glare.

Mitigation Program: No mitigation is required.

8. Natural Resources

A. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. There are no known mineral resources present in the City. Therefore, Project implementation would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

Mitigation Program: No mitigation is required.

B. 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?

No Impact. There are no known mineral resources present in the City. Therefore, Project implementation would not result in the loss of availability of a locally-important mineral resource recovery site.

Mitigation Program: No mitigation is required.

C. Substantial increase in consumption of any natural resource?

No Impact. The proposed project will not consume inordinate or significant amounts of fossil fuels or other natural resources.

Mitigation Program: No mitigation is required. Notwithstanding, due to the conceptual nature of the future residential development and the use of natural resources for heating, fuel and other purposes, proposals would require individual assessments of potential impacts.

Mitigation Program: No mitigation is required.

9. Agricultural Resources

Discussion:

The Housing Element update will not impact agricultural resources. The City of Inglewood was established in February 1908 and is a fully urbanized area. There is no land classified Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland). Project implementation would not convert farmland to non-agricultural use.

A. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. According to the City of Inglewood Zoning Map and the Farmland Mapping and Monitoring Program of Statewide Importance, no zoning for agricultural use exists within the City and no properties are subject to a Williamson Act contract.

Mitigation Program: No mitigation is required.

B. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. According to the Farmland Mapping and Monitoring Program, the City of Inglewood does not currently contain Prime Farmland, Unique Farmland, or Farmland of

Statewide Importance. Even though vacant and underutilized land throughout the City may be developed with housing units, as anticipated by the draft Housing Element, this land is not designated Farmland of any type. Therefore, no impact would occur.

Mitigation Program: No mitigation is required.

C. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

No Impact. The vacant and underutilized land identified in the draft Housing Element for potential residential development does not contain any agricultural uses. Therefore, the project would not involve any changes to land uses and any changes to the environment that would result in the conversion of farmland to nonagricultural use. No impact would occur.

Mitigation Program: No mitigation is required.

10. Biological Resources

Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and game have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. The vacant and underutilized land identified in the draft Housing Element for potential residential development does not contain any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game. Therefore, the project would not involve any changes to biological resources and any changes to the environment that would result in affects to sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. No impact would occur.

Mitigation Program: No mitigation is required.

11. Cultural resources

There are numerous historical resources present in the City; refer to the General Plan Update Technical background Report and map. The City's housing needs would be accommodated primarily by redevelopment, therefore, Project implementation could cause a substantial adverse change in the significance of a historical resource. Historic resources are particularly vulnerable to redevelopment activities accompanying revitalization. The degradation or loss of historic structures or resources that would occur with General Plan implementation was determined to be less than significant with

mitigation incorporated. Additionally, the Hollywood Park Redevelopment EIR evaluated the potential impacts to the demolition of structures for that property. Potential impacts to historic resources were anticipated in the Hollywood Project and in the implementation of the proposed Housing Element Project. These impacts would be consistent with the analysis presented here, and would result in no greater impacts than identified for previous initial studies conducted for the Inglewood Senior Center Project, the Renaissance Housing Project, and other housing projects.. Moreover, due to the conceptual nature of the future residential development and the known existence of historical resources in the area, proposals would require individual assessments of potential impacts to historical resources, as defined by CEQA Guidelines Section 15064.5. Through implementation of the Housing Element programs and policies the Project implementation would result in less than significant impacts to historical resources.

Due to the limited number of remaining vacant parcels and since future housing development would occur primarily as infill and redevelopment, Project implementation is not anticipated to cause a substantial adverse change in the significance of an archaeological resource. Moreover, the residential development sites have already been subject to extensive disruption and may contain artificial fill materials. As such, any archaeological resources, which may have existed on the development sites, have likely been disturbed. Notwithstanding, due to the conceptual nature of the future residential development and the known existence of archaeological resources in the south Bay, proposals would require individual assessments of potential impacts to archaeological resources, as defined by CEQA Guidelines Section 15064.5.

A. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Less than Significant Impact. The draft Housing Element designates adequate sites for potential future development that could accommodate any unmet portion of the RHNA through 2014. The anticipated development would occur on either vacant or underutilized parcels throughout the City. Underutilized parcels in the City may currently contain substandard structures. Although the recycling of underutilized parcels containing substandard structures is an opportunity to create a positive aesthetic impact on that parcel, each future development would be reviewed to determine impacts to cultural or historical resources. If necessary, appropriate mitigation measures designed to protect historic structures would be implemented. Impacts to historical resources due to the adoption of the Housing Element would be less than significant.

Mitigation Program: No mitigation is required.

B. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less than Significant Impact. The City of Inglewood General Plan does not refer to any archaeologically sensitive areas. The project itself would not involve ground-disturbing

activities and would have no potential to adversely affect archaeological resources. However, the draft Housing Element designates adequate sites for potential future development through 2014. Through the City's environmental review process, future development projects would be evaluated for potential impacts to archaeological resources. Impacts to archaeological resources due to the adoption of the Housing Element would be less than significant.

Mitigation Program: No mitigation is required.

C. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant Impact. Due to the past agricultural uses and current urbanized character of the City, it is unlikely that any paleontological resource would be uncovered by future development. Each development that occurs as anticipated by the draft Housing Element would be considered on an individual basis to determine potential impacts to any paleontological resources. Impacts to paleontological resources due to the adoption of the Housing Element would be less than significant.

Mitigation Program: No mitigation is required.

D. Disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact. No conditions exist that suggest human remains are likely to be found on the residential development sites. Due to the level of past disturbance on the development sites, it is not anticipated that human remains, including those interred outside of formal cemeteries, would be encountered during earth removal or disturbance activities. Notwithstanding, ground-disturbing activities, such as grading or excavation, have the potential to disturb as yet unidentified human remains. If human remains were found, those remains would require proper treatment, in accordance with applicable laws. State of California Public Resources Health and Safety Code Section 7050.5-7055 describe the general provisions for human remains. Specifically, Health and Safety Code Section 7050.5 describes the requirements if any human remains are accidentally discovered during excavation of a site. As required by State law, the requirements and procedures set forth in Section 5097.98 of the California Public Resources Code would be implemented, including notification of the County Coroner, notification of the Native American Heritage Commission, and consultation with the individual identified by the Native American Heritage Commission to be the "most likely descendant." If human remains are found during excavation, excavation must stop in the vicinity of the find and any area that is reasonably suspected to overly adjacent remains until the County coroner has been called out, and the remains have been investigated and appropriate recommendations have been made for the treatment and disposition of the remains. Following compliance with State regulations, which detail the appropriate actions necessary in the event human remains are encountered, impacts in this regard would be considered less than significant.

Mitigation Program: No mitigation is required.

12. Population

A. Induce substantial 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)?

Less than Significant Impact. The City's adjusted regional housing needs for the 2006-2014 planning period is 1,658 housing units. The Housing Element anticipates that future residential development would be accommodated within vacant land permitted for residential use (infill development) and redevelopment. A project could induce 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). Implementation of the Housing Element would not induce direct population growth in the City, because the Housing Element does not infer direct development rights. However, the residential development anticipated by the Housing Element would induce population growth in the City directly through the construction of housing. Assuming 100 percent occupancy and 3.0 persons per household, the population growth associated with Housing Element (i.e., development of 1,658 housing units) would be approximately 4,974 persons for the 2006-2014 planning period. This potential population growth would represent an increase of approximately 4.1 percent over the City's 2008 population estimate of 118,878 persons. Potential growth inducing impacts are also assessed based on a project's consistency with adopted plans that have addressed growth management from a local and regional standpoint. The Southern California Association of Governments (SCAG) is the responsible agency for developing and adopting regional housing, population, and employment growth forecasts for local Los Angeles County governments, among other counties. SCAG's six-county region is organized into 14 subregions. The City of Inglewood is located within the SouthBay Council of Governments (SBCOG) subregion.

SCAG's 2014 forecast population for the City of Inglewood is approximately 120,000 persons, representing a population growth of approximately 1,122 persons (approximately .99 percent) between 2008 and 2014.

In consideration of the Housing Element's growth projections and the RHNA's underlying objective to provide the City's fair share of additional housing, and since the City's General Plan is currently being updated to reflect current population estimates and forecasts, the proposed Housing Element would remain generally consistent with the General Plan. A less than significant impact would occur in this regard.

Mitigation Program: No mitigation is required.

B. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Less than Significant. The City of Inglewood is completing the Housing Element Update in order to meet needs for housing in the City determined in the RHNA. The project itself would not displace any housing, and would not involve demolition of any housing units or other structures. However, any future development projects proposed in accordance with the draft Housing Element would be subject to CEQA review. Therefore, the adoption of the Housing Element would have a less than significant impact.

C. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. The City of Inglewood is completing the Housing Element update in order to meet needs for housing in the City determined in the RHNA. The project itself would not displace any people, and would not involve demolition of any housing units or other structures. Any future projects proposed in accordance with the draft Housing Element would provide housing to meet the RHNA housing goals for the City. No impacts would occur.

13. Land Use Planning

A. Physically divide an established community?

No Impact. The residential development anticipated by the Housing Element would be accommodated within vacant land permitted for residential use (i.e., infill development) and redevelopment. Future residential development anticipated by the Housing Element would replace some vacant lands with residential uses throughout the City. However, the City is fully built out (98 percent) and fully urbanized; therefore, it is not anticipated that future residential development would physically divide an established community or lessen access to community amenities.

Mitigation Program: No mitigation is required.

B. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant Impact.

The City of Inglewood is fully built out and fully urbanized. The City's housing needs would be accommodated within vacant land permitted for residential use (infill development) and redevelopment. Residential development in accordance with the Housing Element would replace vacant lands with residential uses and intensify some areas through infill construction. Growth in the remainder of the City would be associated with the incremental buildout of vacant and underutilized properties. The incremental growth would consist of increased residential opportunities in the Downtown

Mixed Use area, along transit corridors and intensification within transitioning residential designations with additional density potential based on state Density Bonus provisions, among other areas. The City's housing needs would be accommodated primarily by redevelopment (i.e., underutilized land and rezoning). All future residential projects would be subject to review under the City's environmental and design review process. Additionally, due to the conceptual nature of the future residential development, proposals would require individual assessments to ensure consistency with the City's General Plan, Zoning Code, and other relevant planning documents. If necessary, appropriate mitigation would be required to avoid or reduce impacts. California Government Code Section 65300.5 requires internal consistency among various elements of the General Plan. City staff has reviewed the other elements of the General Plan and has determined that the proposed Housing Element provides this necessary consistency. The City would maintain this consistency, as future General Plan amendments are processed, by evaluating proposed amendments for consistency with all General Plan Elements.

There are several existing environmental plans that are applicable to the City, including the Regional Comprehensive Plan, the Congestion Management Plan, and the Air Quality Management Plan. The applicability of these plans is discussed under their respective issue areas (air quality, traffic and circulation, etc.). As indicated previously, the current adopted land use plans (the City of Inglewood Comprehensive General Plan and the Hollywood Park Specific Plan) will serve to promote the development of new housing as required under the RHNA. The RHNA housing need (1,658 units) represents a mandate required by the State of California as part of the RHNA's implementation. The City is obligated under State law, to fulfill the RHNA requirements that have been assigned to the City. As part of the RHNA's development, SCAG relied on growth projections developed as part of the Regional Transportation Plan (RTP).

These growth projections were evaluated in the environmental studies prepared for both the RHNA and RTP. The Inglewood Draft Housing Element will not introduce any additional impacts beyond that previously anticipated under the City of Inglewood General Plan, the Hollywood Park Specific Plan, or the aforementioned regional plans. As a result, no significant adverse impacts on adopted environmental plans are anticipated.

The draft Housing Element will not result in any changes to the adopted land use policy or the existing Land Use Plan provided in the Land Use Element that would divide an established community. As indicated previously, the RHNA housing objectives developed for the City by SCAG total 1,658 housing units. According to SCAG, this number represents the total number of new units that should be added to the City's housing inventory between 2006 and 2014 to meet the existing and projected housing need for the City. The City has established a range of residential zones that will allow completion of this RHNA housing goal. The City will retain the current general plan and zoning land use designations that are applicable to the residential neighborhoods as a means to accommodate the unmet RHNA of for 993 units. A total of 2,485 units are theoretically possible if economic conditions and other influencing factors contribute to a

positive housing market in Inglewood. In addition to maintaining the current land use designations, in 2009, the City approved the Hollywood Park Specific Plan that created a mixed-use housing designation and calls for increased density based on Specific Plan standards.

The Manchester-Prairie Redevelopment Project area and the Century Redevelopment Project area that included the 238-acre Hollywood Park Specific Plan site were amended in 2009 to change land use designations within both project areas to show the 238-acre property as “Major Mixed Use” on the General Plan Land Use map. The Major Mixed Use Land Use designation will allow the development of 2,995 single family and multiple-family units with densities ranging from 30 to 84 dwelling units per acre. Inclusionary affordable housing units will be required for this project.

Two other mechanisms to enable residential development are the C-1 zone residential standards and the Specific Plan standards established by California Government Code Section 65450 et. seq. As mentioned earlier in this Element, the C-1 zone allows residential units to be developed at a density of one unit per 800 square feet of lot area. Residential units are permitted in structures that are three stories or higher. There is no height limit in the C-1 zone. The Specific Plan provisions allow development of project specific goals, policies and programs that can modify density, setbacks, building heights and other general plan and zoning standards to accommodate a comprehensive development. Specific Plan were adopted for the 27-acre Village Specific Plan area and the 238-acre Hollywood Park Specific Plan area. Because of the availability of the PAD process, Specific Plan flexibility and the density standards for the C-1 zone, the City of Inglewood does not consider the down zoning changes in the late 1980's to be a hindrance to providing affordable housing to its residents.

In 2004 the City of Inglewood approved a General Plan Amendment and Zone Change to change the land use designation of 3500 Pincay Drive from commercial to residential in order to facilitate the development of 376 single-family residential units. The completed project consists of 376 single-family detached units, residential units with guest parking, and a large unenclosed community recreation area with homes clustered around courts and a pedestrian paseo encircling each residential cluster. The property was rezoned from (C-R) Commercial and Recreation to R-2 (Limited Multiple-family). The general plan was amended from Commercial to Low-Medium Density Residential. The units were fully occupied during 2008.

In addition, on March 15, 2005, the City Council adopted **Ordinance No. 05-03** to allow mixed-use (residential with commercial) development within a C-2 zoned portion of Morningside Park. This mixed-use overlay is located within an area bounded by 85th Street (south side of street only), Crenshaw Boulevard (west side of street only), Manchester Boulevard (north side of street only), and Crenshaw Drive (east side of street only).

On November 14, 2006, the City Council adopted **Ordinance No. 6-20** to change the General Plan Land Use designations from “Commercial” to “Commercial Residential” for

those C-2 (General Commercial) and C-2A (Airport Commercial) zoned properties on Manchester Boulevard bounded by the west side of Ash Avenue to the west, the west side of Eucalyptus Avenue (north of Manchester Boulevard) to the east, including those C-2 and C-2A zoned properties located immediately north and south of Manchester Boulevard on Ash Avenue, Oak Street, Cedar Avenue, Inglewood Avenue, and Eucalyptus Avenue that are contiguous to properties that front on Manchester Boulevard to allow mixed use development. The area also includes the properties that front the south side of Manchester Boulevard located between Inglewood High School the east and Eucalyptus Avenue on the west; and includes those C-2A zoned properties located on the east side of La Cienega Boulevard, bounded by the north side of Century Boulevard to the south and the 405 Freeway off-ramp to the north. An overlay zoning designation applies to the area.

The City is currently exploring extending as part of the Inglewood General Plan Update process, the mixed use overlay zone to other commercial areas of the city to increase housing opportunities and to encourage neighborhood oriented development that could provide live to work uses for residents.

The following table shows land use densities permitted for the various residential zones and changes that were made since adoption of the General Plan in 1968 and amendments in 1980.

<u>Zoning Designation</u>	<u>1985 Density</u>	<u>Density Changes Since 1985</u>
R-2	One unit per 2,500 sq. ft. of lot area up to two units; then one unit per 2,000 sq. ft. of lot area for each additional unit.	One unit per 2,500 sq. ft. of lot area up to two units then one unit per 3,000 sq. ft. of lot area for each additional unit.
R-2A	Zone did not exist; R-2A properties were zoned R-2 prior to 1985.	One unit per 2,500 sq. ft. of lot area up to two units; then one unit per 4,000 sq. ft. of lot area for each additional unit.
R-3/P-1	One unit per 1,000 sq. ft. of lot area.	One unit per 1,400 sq. ft. of lot area for small lots* and one unit per 1,100 sq. ft. of lot area for large lots.*
R-4	Number of units were	One unit per 1,250 sq. ft.

	determined by a floor-area to lot-area ratio.	of lot area for small lots* and one unit per
	(Complexity caused most developers to utilize R-3 standards instead.)	800 sq. ft. of lot area for large lots.*
HPSP	-----	30-84 Dwelling Units per acre, lot and unit sizes vary

The density changes that occurred in the R-3 and R-4 zoning categories should ensure that land use conflicts based on General Plan projections and goals does not occur.

Mitigation Program: No mitigation is required.

C. Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. There are no habitat conservation plans or natural community conservation plans within or in the vicinity of the City. Therefore, implementation of the draft Housing Element would not conflict with any habitat conservation plans or natural community conservation plans. No impacts would occur.

Mitigation Program: No mitigation is required.

14. Housing

A. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Less Than Significant Impact. The Housing Element anticipates that future housing development would be accommodated within vacant or underutilized land permitted for residential use and redevelopment. Therefore, future housing development occurring as redevelopment could displace existing housing and people, although, it is not anticipated to occur in substantial amounts. Construction of replacement housing would occur through redevelopment, as anticipated by the Housing Element. The City's housing needs would be accommodated primarily by redevelopment. The incremental growth was anticipated to consist of increased residential opportunities in the Downtown and mixed use area. As such, housing displacement and replacement was previously anticipated for development of ordinances to allow mixed uses in the downtown and elsewhere. The project would result in no greater impacts than previously identified. The California Government Code Section 7260(b) (the "California Relocation Law") establishes "a uniform policy for the fair and equitable treatment of persons displaced as a direct result of programs or projects undertaken by a public entity." A primary purpose of the California Relocation Law is to ensure that these persons not suffer

disproportionate injuries as a result of programs and projects designed for the benefit of the public as a whole and to minimize the hardship of displacement on these persons

Such activities would be conducted pursuant to all requirements of the California Redevelopment Law and Relocation Law, within the jurisdiction of the redevelopment Agency. Following compliance with the California Redevelopment and Relocation laws, impacts associated with the displacement of housing and persons would be reduced to a less than significant level. Additionally, the Housing Element has been developed to meet the future population needs of the City, and future development would be consistent with the goals and policies set forth in the Element, as well as other measures in the General Plan. Impacts relative to the displacement of existing housing are considered to be less than significant.

Mitigation Program: No mitigation is required.

B. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Less than Significant. The City of Inglewood is completing the Housing Element Update in order to meet needs for housing in the City determined in the RHNA. The project itself would not displace any housing, and would not involve demolition of any housing units or other structures. However, any future development projects proposed in accordance with the draft Housing Element would be subject to CEQA review.

Therefore, the adoption of the Housing Element would have a less than significant impact.

C. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. The City of Inglewood is completing the Housing Element update in order to meet needs for residents of 1,658 new housing units determined in the RHNA. The project itself would not displace any people, and would not involve demolition of any housing units or other structures. Any future projects proposed in accordance with the draft Housing Element would provide housing to meet the RHNA housing goals for the City. No impacts would occur.

15. Transportation/Traffic

Level of service (LOS) is commonly used as a qualitative description of intersection operation and is based on the capacity of the intersection and the volume of traffic using the intersection. The Intersection Capacity Utilization (ICU) analysis method is utilized in traffic impact analyses to determine the operating LOS of the signalized study intersections; and the Highway Capacity Manual (HCM) analysis methodology is utilized to determine the operating LOS of the unsignalized study intersections.

The ICU analysis methodology describes the operation of a signalized intersection using a range from LOS A (freeflow conditions) to LOS F (severely congested conditions), based on corresponding volume-to-capacity (V/C) ratios;
LOS and V/C Ratio Ranges – Signalized Intersections.

LOS	V/C Ratio
A	<0.60
B	0.61 – 0.70
C	0.71 – 0.80
D	0.81 – 0.90
E	0.91 – 1.00
F	>1.00
Source: 1990 Transportation Research	

The Highway Capacity Manual (HCM) operational analysis methodology describes the operation of an unsignalized intersection using a range from LOS A (free-flow conditions) to LOS F (severely congested conditions), based on delay experienced per vehicle; refer to Table 4.15-2, *LOS and V/C Ratio Ranges – Unsignalized Intersections.*

LOS	V/C Ratio
A	< 10.0
B	10.01 – 15.0
C	15.01 – 25.0
D	25.01 – 35.0
E	35.01 – 50.0
F	> 50.0
Source: 1990 Transportation Research	

LOS is based on the average stopped delay per vehicle for all movements of all-way stop-controlled intersections; for one-way or two-way stop-controlled intersections, LOS is based on the worst stop-controlled movement.

Performance Criteria

The Inglewood *General Plan* Circulation Element defines an “acceptable level of service” as Level of Service “D” or better. The LOS “D” goal adopted by the Inglewood reflects the City’s desire to maintain stable traffic flow, realizing that peak hour congestion may occur at locations near the freeways or other locations with unusual traffic characteristics due to regional traffic flow. LOS “D” conditions conform to County-wide goals for traffic control along regional and sub-regional transportation routes.

A. Cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?

Less than Significant Impact. The existing circulation system that serves the City is described in Circulation Element and in the General Plan Update Technical Report. With some exceptions, City major and minor intersections were also reviewed as part of the Hollywood Park Redevelopment Project FEIR. All of the study intersections are currently operating at an acceptable LOS (LOS D or better), with the exception of 17 intersections. The City's future housing needs would increase vehicular movement in the vicinity of each future development site during AM and PM peak hour periods. Future increases in traffic volumes could aggravate existing deficiencies and/or cause an intersection to operate at an unacceptable LOS. The proposed Housing Element RHNA goal of 1,658 units was considered in the SCAG Regional Plan and Congestion Management Plan growth projections for the region. The addition of 1,658 housing units will result in an additional 13,244 vehicle trips on a daily basis. Of this total traffic generation, more than 1,330 trips will be generated during the morning and evening peak hours. These trips will be distributed throughout the City, and the level of service of individual intersections will not be significantly affected. As indicated in the previous sections, the City is obligated under State law, to fulfill the RHNA requirements that have been assigned to the City. As part of the RHNA's development, SCAG relied on growth projections developed as part of the Regional Transportation Plan (RTP).

These housing and traffic growth projections were evaluated in the environmental studies prepared for both the RHNA and RTP. Furthermore, the residential development envisioned as part of the draft Housing Element's implementation is consistent with that contemplated under the City of Inglewood General Plan and the Hollywood Park Specific Plan. As a result, impacts are less than significant.

As such, the traffic increases and circulation impacts associated with future housing were anticipated in the regional traffic and congestion plan. Implementation of the proposed Project would be consistent with the analysis presented in the traffic and mobility plan, and would result in no greater impacts than previously identified. However, due to the conceptual nature of the future residential development, proposals could require individual assessments of potential impacts to traffic and circulation. If necessary, mitigation would be recommended to further minimize potential impacts.

Mitigation Program: No mitigation is required.

B. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?

Less than Significant Impact. In June 1990, the Congestion Management Program (CMP) was created statewide as a result of Proposition 111. The passage of Proposition 111 required that urbanized areas in California with a population over 50,000 to adopt a CMP. For the County of Los Angeles, the authorized CMP agency is the Los Angeles Metropolitan Transportation Authority (MTA). Los Angeles County adopted its most recent CMP in 2000. The City of Inglewood is required to demonstrate compliance with the Los Angeles County CMP. There are 2 CMP intersections within the City. The target operation for CMP facilities is LOS E or better. Both of the two CMP intersections are currently (at time of document preparation) operating deficiently (LOS E or worse).

The City's future housing needs would increase vehicular movement in the vicinity of each future development site and potentially impact CMP facilities. Depending on the proximity to the CMP facilities, future residential development could aggravate existing conditions. The two of the CMP intersections would operate deficiently (LOS E or worse) under future conditions. The RHNA housing unit goals were considered in the Congestion Management analysis, since additional residential development was assumed. As such, potential impacts to CMP facilities associated with future housing were anticipated. Implementation of the proposed Project would be consistent with the analysis presented in the CMP and SCAG population forecasts, and would result in no greater impacts than previously identified. Therefore, impacts to CMP facilities would be less than significant. Due to the conceptual nature of the future residential development, proposals would require individual assessments of potential impacts to traffic and transportation, including CMP facilities. If necessary, mitigation would be required to reduce potential impacts to a less than significant level. Additionally, project specific measures would further CMP objectives.

Mitigation Program: No mitigation is required.

C. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. Due to the nature and scope of the anticipated housing development, an increase in air traffic levels or change in location that would result in substantial safety risks are not anticipated to occur. The draft Housing Element itself would not involve building any structures and thus would not result in any changes to air traffic patterns and in any substantial safety risks related to aircraft traffic. Additionally, future development anticipated under the draft Housing Element would comply with ALUP and would not result in changes to air traffic patterns. Therefore, no impact would occur.

Mitigation Program: No mitigation is required.

D. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. The City's future housing needs would increase traffic volumes, potentially requiring circulation infrastructure improvements. All traffic improvements would be constructed according to the City's roadway safety standards. Therefore, transportation/traffic hazards due to a design feature or incompatible uses would not substantially increase. Furthermore, due to the conceptual nature of the future residential development, proposals would require individual assessments of potential impacts relative to traffic and circulation, including an evaluation of potential traffic hazards. If necessary, mitigation would be required to reduce potential traffic hazards to a less than significant level.

Mitigation Program: No mitigation is required.

E. Result in inadequate emergency access?

Less Than Significant Impact. All residential development site plans would be required to satisfy the City's traffic and safety regulations that address emergency access. Notwithstanding, due to the conceptual nature of the future residential development, proposals would require individual assessments of potential impacts to traffic patterns, including an evaluation of emergency access routes. If necessary, mitigation would be required to reduce potential impacts to a less than significant level.

Mitigation Program: No mitigation is required.

F. Result in inadequate parking capacity?

Less than Significant Impact. The Housing Element anticipates the development of 1,658 residential units, each with resultant demands for off-street parking. The, specific details of each project would determine actual parking demands. IMC Section 12-39, Parking Standards, specifies the parking requirements for Residential Zones in order to ensure that adequate off-street parking facilities, loading areas, and vehicle movement areas are provided. Through the City's site plan review process, all future residential development would be evaluated in order to ensure compliance with IMC Chapter 12. Therefore, Project implementation would not result in inadequate parking capacity and a less than significant impact would occur in this regard.

Mitigation Program: No mitigation is required.

G. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

Less than Significant Impact. Public transportation is available to Inglewood's residents through the Metro-rapid County Transportation Authority (METRO) bus service. The METRO operates several bus routes serving the City of Inglewood). Moreover, the City maintains shuttle service for senior residents and for use in the downtown area.

The City's future housing needs would increase the demand for bus service. Due to the conceptual nature of the future residential development, proposals would require

individual assessments of potential impacts to City policies, plans or programs supporting alternative transportation. If necessary, mitigation would be required to reduce potential impacts to a less than significant level. Compliance with project specific measures is anticipated to fully mitigate potential impacts associated with alternative transportation.

Mitigation Program: No mitigation is required.

16. Public Services

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

A. Substantial increase in demand for Fire protection or services?

Less than Significant Impact. Fire protection and emergency medical services for the City are provided by Battalion 20 of the Los Angeles County Fire Department (LACFD). Additionally, the LACFD participates in a mutual aid, regional response planning effort, without regard to jurisdictional boundaries. There are five fire stations located throughout the City; The City's future housing needs would increase the demand for fire protection services and may require improvements to existing facilities or increases in staffing and equipment. The environmental impacts associated with the provision of new or physically altered fire protection facilities would be dependant upon the location and nature of the proposed facilities, and would undergo separate environmental review pursuant to *CEQA Guidelines*. The increased demand for fire protection services from General Plan buildout could result in the need for additional fire facilities or personnel, although, impacts would be less than significant. The proposed Housing Element was considered in preparation of the General Plan Land Use Element that is based on a maximum population of 161,761 (Zoning Code) and 121,554 (Land Use Element). Since additional residential development was assumed. As such, the impacts to fire protection services associated with future housing were anticipated in the General Plan. Implementation of the proposed Project would be consistent with the analysis presented in the GPEIR, and would result in no greater impacts than previously identified. The LACFD would review and comment on each individual site plan submitted, prior to approval. As part of the review, the LACFD would impose standard conditions of approval, including recommending mitigation, which would ensure that individual project impacts on fire protection services are reduced to a less than significant level. Implementation of project specific measures imposed by LACFD would reduce impacts to fire protection services to less than significant.

Mitigation Program: No mitigation is required.

B. Substantial increase in demand for Police protection or services?

Impact Adequately Analyzed in General Plan. The Inglewood Police Department (IPD) provides police patrol and crime prevention services to the City of Inglewood. The IPD is headquartered at One Manchester Boulevard and services the entire City. The IPD is responsible for crime prevention, law enforcement, protection of life and property, preservation of peace, and the apprehension of criminals. The recommended officer-to-population ratio is 1.6 officers per 1,000 population. The City's future housing needs would increase the demand for police protection in the City, and may require improvements to existing facilities or increases in staffing and equipment. The environmental impacts associated with the provision of new or physically altered police protection facilities would be dependant upon the location and nature of the proposed facilities, and would undergo separate environmental review pursuant to *CEQA Guidelines*.

General Plan buildout would result in an increased demand for police protection services and may require a need for additional law enforcement personnel and patrol vehicles in the future, although, impacts would be less than significant. Implementation of the proposed Project would result in no greater impacts than previously identified. Future residential development would be reviewed by the IPD in order to assess potential impacts to police protection services on a project-by-project basis. Implementation of the General Plan measures would ensure that sufficient police facilities and personnel are maintained. Therefore, impacts to police services and facilities would be reduced to less than significant.

Mitigation Program: No mitigation is required.

C. Would the project cause an increase or unmet demand for educational services or schools?

Less than Significant Impact. The City is served by the Inglewood Unified School District. The IUSD has 19 schools under its authority. In 2008, there was a total of 10,527 elementary students, 2,698 middle school students and 4,798 high school student spaces. The City's future housing needs would increase the City's student population, and may require new school facilities and/or improvements to existing facilities. The degree of impacts to schools would be dependant upon the size and location of the residential development and the existing condition of the school facilities serving the area. The environmental impacts associated with the provision of new or physically altered school facilities would be dependant upon the location and nature of the proposed facilities, and would undergo separate environmental review pursuant to *CEQA Guidelines*. The General Plan buildout would generate additional students, resulting in less than significant impacts in the IUSD, based on the collection of school developer fees established by Senate bill 50. According to Government Code Section 65995, the development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation." As such, the impacts to school facilities associated with future housing would be less than significant.

Mitigation Program: No mitigation is required.

D. Impact on Parks or Recreation?

Less than Significant Impact. The City of Inglewood Parks and Recreation Services Department currently operates 11 park facilities totaling approximately 89.6 acres within the City. Additional public and private recreational opportunities are available within the City. The City's future housing needs would increase the demands for parkland and recreational facilities, and usage of existing facilities. Future developments anticipated by the draft Housing Element would be subject to CEQA review and would either be required to pay residential development fees and in-lieu fees to the City for the development and maintenance of park facilities or provide improved parks. If fees are necessary, the amount would be determined by the City Department of Planning and Building during the City's approval process for those projects. Impacts to parks and recreational facilities due to the adoption of the Housing Element would be less than significant.

Mitigation Program: No mitigation is required.

E. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less than significant impact. The City of Inglewood Parks and Recreation Services Department currently operates 11 park facilities totaling approximately 89.6 acres within the City. Additional public and private recreational opportunities are available within the City. The City's future housing needs would increase the demands for parkland and recreational facilities, and usage of existing facilities. The City of Inglewood Parks and Recreation Services Department currently operates 11 park facilities totaling approximately 89.6 acres within the City. Additional public and private recreational opportunities are available within the City. The City's future housing needs would increase the demands for parkland and recreational facilities, and usage of existing facilities. Additionally, future housing development may require new parks or recreational facilities, and/or improvements to existing facilities. The environmental impacts associated with the provision of new or physically altered parks and recreational facilities would be dependant upon the location and nature of the proposed facilities, and would undergo separate environmental review pursuant to *CEQA Guidelines*. The population growth associated with General Plan buildout would create a demand on current recreational infrastructure including parks, facilities, and programs, as well as a demand for an additional 35-45 acres of parkland.

The proposed Housing Element was considered in the GPEIR analysis, since additional residential development was assumed. Individual residential development projects are reviewed to determine their potential impact on parks and recreational facilities and developments that consist of the creation of more than five acres or five condominiums are required to pay developer impact park fees (Quimby to be used for the acquisition,

development, improvement, and maintenance of public parks and recreational facilities in the City.

Mitigation Program: No further mitigation is required.

F. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Less than Significant Impact. Refer to above response

Mitigation Program: No further mitigation is required.

17. Public Utilities

A. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less than Significant Impact. The City requires NPDES permits, as administered by the Los Angeles RWQCB, according to federal regulations for both point source discharges (a municipal or industrial discharge at a specific location or pipe) and nonpoint source discharges (diffuse runoff of water from adjacent land uses) to surface waters of the United States. For point source discharges, such as sewer outfalls, each NPDES permit contains limits on allowable concentrations and mass emissions of pollutants contained in the discharge. New residential development associated with the Housing Element would continue to comply with all provisions of the NPDES program, as enforced by the LARWCB. Additionally, the NPDES Phase I and Phase II requirements would regulate discharge from construction sites. All future residential projects would be required to comply with the wastewater discharge requirements issued by the LARWCB and LARWCB. Therefore, the residential development would not result in an exceedance of wastewater treatment requirements of the Los Angeles County RWQCB with respect to discharges to the sewer system or stormwater system within the City.

Mitigation Program: No mitigation is required.

B. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than Significant Impact .Water.

The State of California Urban Water Management Planning (UMWP) Act of 1983 requires urban water suppliers servicing 3,000 or more connections or supplying more than 3,000 acre feet to prepare and adopt an UMWP for submission to the Department of Water Resources. The deadline for submitting the 2010 UWMP is on December 31, 2010.

The quantity and the quality of the water resources have a significant impact upon the water supply to the people and economic zone. Hence better water management and planning will be the best guiding criteria for decision making to pursue the development and effective use of water.

Initial amendments to the UWMP required that the total projected water use be compared to water supply sources over the next 20 years, in 5 years increment. Other amendments include provisions for recycled water use and demand, management measures and a water shortage contingency plan.

The State of California Department of Water Resources (DWR) has prepared a guidebook for implementation of Senate Bill 610 and 221 to assist the water suppliers in integrating water and land use planning. The information provided in that bill can be used as a tool in preparing the plan.

The City's water service area covers approximately 4,600 acres within the City's corporate boundaries. Water is provided by the City's system to approximately 84 percent of the residences and businesses in the City. According to Census Bureau 2008 Data, the City's population is around 118,878 and records project an approximate annual 3.9% increase in population. In portions of the City, water services are provided by Golden State Water Company and Cal-American Water Company. It is estimated that there are approximately 18,500 residents receiving water service from these two companies.

The City's latest water statistics for 2009 comprise of around 13,255 meter connections, 8,002 acre-feet annual water consumption and 754 acre-feet recycled water consumption. Other sources of water supply are from Metropolitan Water District of Southern California (MWD) through West Basin Municipal Water District (WBMWD). The City of Inglewood has active wells that extract an average of 5,600 acre-feet per year. The total water production average at 10,705 acre-feet per year and the total consumptions average to 8,002 acre-feet per year. The average maximum month demand is around 800 acre-feet.

The City prepared and adopted its UWMP in 2005. Currently, the City produces its water supply from five active wells and seven imported water connections. Through these eight connections, Metropolitan' Water Districts capacity to supply the City is 4,000 gallons per minute. The UWMP describes the water demands and future trends in the City. Population projections for Inglewood, according to the UWMP, indicate an increase to about 120,000 persons by 2014, with a resultant water demand of approximately 8,034 acre feet (AF). Similarly, population projections for Inglewood indicate an increase to about 130,500 persons by 2030, with a resultant water demand of approximately 8,705 AF. The UWMP also concludes that the City's service area will have sufficient supplies to meet 100 percent of its projected demand for the next 25 years under single dry year and multiple dry year scenarios. According to the UWMP, "completion of several regional groundwater and imported water supply improvements, along with those currently under development, would heighten reliability and provide

greater flexibility in meeting the City's projected water demands." The City's future housing needs would increase water consumption, placing greater demands on water facilities. Due to the limited number and geographical locations of the remaining vacant parcels, and since future housing development would occur primarily as infill and redevelopment, Project implementation is not anticipated to require significant facility extensions/upgrades to the existing system, in order to meet the increased demand. The UWMP concluded future population growth would increase water consumption, placing greater demands on water facilities, as well as completion of several regional groundwater and imported water supply improvements. The UWMP also concluded the City's service area would have sufficient supplies to meet 100 percent of its projected demand. The proposed Housing Element was considered in the UWMP analysis, since additional residential development was assumed. As such, the increased water consumption and demand on facilities associated with future housing was anticipated in the UWMP. Implementation of the proposed Project would be consistent with the analysis presented in the UWMP, and would result in no greater impacts associated with water demands and facilities than previously identified. The conservation and management efforts by Metropolitan and Golden Water Co. among others to protect future water supplies, would reduce impacts to less than significant.

Wastewater. The City of Inglewood Public Works Department maintains and operates the local sanitary sewer collection system. The larger trunk lines are owned and maintained by the Sanitation District of Los Angeles County. The City's future housing needs would generate increased wastewater flows, placing greater demands on wastewater treatment and collection. The General Plan would not impact wastewater facilities, which are sufficient to handle the new wastewater generated. The proposed Housing Element population levels were considered by the Public Works Department as part of its water and wastewater annual reporting and service expansion programs. . As such, the increased wastewater generation and impacts to sewer facilities associated with future housing was anticipated and the proposed Project would be consistent with the level of service requirements projected by the Public Works Department. Due to the conceptual nature of the future residential development, proposals would require individual assessments of potential impacts to wastewater facilities. If necessary, mitigation would be required to reduce potential impacts to a less than significant level. Therefore, Project implementation would result in a less than significant impact.

The General Plan includes policies that call for the support of programs to reduce water and waste water usage in accordance with State requirements and local ordinances. In addition, the Plan provides policy to require on-site recycling for all new development in the City. With the reduction in water uses, and increased recycling efforts, the impact from increased dwelling units as stated in the Housing Element is less than significant.

Mitigation Program: No mitigation is required.

C. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than Significant Impact. See previous discussion of drainage facilities above. Future development could lead to the presence of debris, leaves, soils, oil/grease, and other pollutants within the parking areas on-site in the absence of mitigation. These pollutants may enter the storm drain system during periods of rainfall. Under Section 402 of the Clean Water Act (CWA), all point source discharges of pollutants to waters of the United States (including lakes, rivers, wetlands, etc.) must be issued a National Pollutant Discharge Elimination System (NPDES) permit. NPDES permits issued for point sources must contain measures for ensuring any discharges meet water quality-based provisions of Section 301 of the CWA. As a result, discharges may not contain pollutants at levels which would cause the receiving water body to fail in meeting a water quality standard set by the State of California or the EPA for that water body. In addition, discharges must meet the technology based requirements of Section 301 of the CWA. Discharges must meet an acceptable level of pollution control for that type of discharge, regardless of whether or not that level of control is specifically needed to protect the water body to which the discharge is directed. The implementation of these existing regulations and other pertinent requirements will mitigate any potential impacts. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

Mitigation Program: No further mitigation is required.

D. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less than Significant Impact.

Senate Bills 221 and 610 were signed into law in 2001 and took effect January 1, 2002. The two bills amended State companion bills provide a regulatory forum that requires more collaborative planning between local water suppliers and cities and counties. All SB 610 and 221 reports are generated and adopted by the public water supplier. Senate Bill (SB) 610 requires a detailed report regarding water availability and planning for additional water supplies that is included with the environmental document for specified projects. All "projects" meeting any of the following criteria require the assessment:

- A proposed residential development of more than 500 dwelling units (DU);
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet (SF) of floor space;
- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 SF of floor space;
- A proposed hotel or motel, or both, having more than 500 rooms;

- A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 SF of floor area;
- A mixed-use project that includes one or more of the projects specified in this subdivision; or
- A project that would demand an amount of water equivalent to, or greater than the amount of water required by a 500-DU project.

While SB 610 primarily affects the Water Code, SB 221 principally applies to the Subdivision Map Act. The primary effect of SB 221 is to condition every tentative map for an applicable subdivision on the applicant by verifying that the public water supplier (PWS) has “sufficient water supply” available to serve it. Due to the conceptual nature of the future development, proposals would require individual assessments of potential impacts to water supplies. All future residential development would be subject to compliance with conservation measures. Additionally, any future residential development meeting SB 610 criteria would require a water supply assessment. Similarly, any residential project involving a subdivision pursuant to SB 221 would require verification of sufficient water supply from the water supplier. Compliance with the existing regulatory framework and the GPEIR measures would further ensure that sufficient water supplies would be available from existing entitlements and resources to serve future development.

Future water consumption will be limited to that typical of residential development, and this consumption will be related to water used for potable consumption, routine maintenance and landscaping. No industrial wastewater discharges would be associated with the uses anticipated under the draft Housing Element’s implementation. The majority of the potential development sites are currently paved or covered over with impervious surfaces, which could lead to the presence of debris, leaves, soils, oil/grease, and other pollutants being transported into the storm drains on site. Given the developed character of the potential development sites, there is likely to be an improvement in the quality of storm water runoff. Future development projects will be required to comply with the National Pollutant Elimination System Discharge (NPDES) requirements. As a result, the draft Housing Element’s adoption and subsequent implementation will not result in any significant adverse impacts.

The General Plan includes policies that call for the support of programs to reduce water and waste water usage in accordance with State requirements and local ordinances. In addition, the Plan provides policy to require on-site recycling for all new development in the City. With the reduction in water uses, and increased recycling efforts, the impact from increased dwelling units as stated in the Housing Element is less than significant.

Mitigation Program: No mitigation is required.

E. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?

Less than Significant Impact. Future water wastewater amounts will be limited to that typical of residential development, and the uses will be related to wastewater generated from routine household uses. No industrial wastewater discharges would be associated with the uses anticipated under the draft Housing Element's implementation. The majority of the potential development sites are currently paved or covered over with impervious surfaces, which could lead to the presence of debris, leaves, soils, oil/grease, and other pollutants being transported into the storm drains on site. Given the developed character of the potential development sites, there is likely to be an improvement in the quality of storm water runoff. Future development projects will be required to comply with the National Pollutant Elimination System Discharge (NPDES) requirements. As a result, the draft Housing Element's adoption and subsequent implementation will not result in any significant adverse impacts.

Mitigation Program: No mitigation is required.

F. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less than Significant Impact. Waste Management Disposal, under contract with the City, provides weekly residential trash collection service (along with commercial and industrial refuse collection). The residents sort the trash, recyclables, and yard waste, as part of the City's curbside recycling program. After collection, the waste stream is sorted for recyclables and then transferred for shipment. The remaining non-recyclable materials are then disposed of at the Puente Hills Sanitary Landfill, Inglewood's primary disposal facility. In 2004, the average daily waste quantities disposed of were 22,345 cubic yards (12,290 tons) at the Puente Hills Landfill. The Puente Hills Sanitary Landfill is anticipated to reach capacity and close in December 2015. City's future housing needs would generate additional solid waste, placing an increased demand on solid waste disposal services and ultimately requiring disposal at a landfill. Without specific housing project details, it is not possible to precisely determine the volume of solid waste that would be generated by future residential development. The development of 1,658 residential units (1,000 square feet average) would generate a total of approximately 1,513 tons/year. Puente Hills Landfill handles 11,808 tons per day and therefore, the additional waste amount would be less than one percent. Based on criteria established by the Los Angeles County Sanitation Districts (LACSD) there would be an insignificant impact. The proposed Housing Element was considered and solid waste generation associated with future housing was anticipated and the proposed Project would result in no greater impacts than previously identified.

The City has adopted a Source Reduction and Recycling Element (SRRE) in compliance with the requirements of AB 939. Pursuant to AB 939, the California Integrated Waste Management Board required all cities and counties within the State to prepare integrated waste management plans to attain solid waste reduction of 50 percent by the end of year 2000. Specifically AB 939 requires that each city and county in California reduce the amount of waste disposed to the landfill by 50 percent

from 1990 levels by the year 2000, and to maintain the 50 percent level thereafter. In 2007 the City's waste stream diversion was 30% when measured; (30% measured equals 50% by the California Integrated Waste Management Board formula). All future residential development projects within the City must comply with the SRRE program for diverting solid waste. Additionally, GPEIR measures require recycling and composting. Continued compliance with the SRRE program and GPEIR measures would ensure that the impacts to the capacities of the landfill serving the City are minimized, thus, a less than significant impact would occur in this regard.

The General Plan includes policies that call for the support of programs to reduce solid waste materials in landfill areas and the recycling of solid waste in accordance with State requirements. In addition, the Plan provides policy to require on-site recycling for all new development in the City. With the reduction in solid waste through recycling efforts and the available capacity in landfill areas, the impact from increased dwelling units as stated in the Housing Element is less than significant.

18. Safety/ Hazards and Hazardous Materials

A. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less than Significant Impact. The secondary activities that would occur at the future residential developments (e.g., building and landscape maintenance) would involve the use of limited quantities of hazardous materials. Cleaning and degreasing solvents, fertilizers, pesticides, and other materials used in the regular maintenance of buildings and landscaping would be utilized by future residential uses. Thus, the residential development anticipated by the Housing Element would increase in the use of household cleaning products and other materials routinely used in building maintenance. However, no significant amounts of hazardous materials would be utilized, disposed of, or transported in conjunction with future residential developments. With proper use and disposal, household maintenance chemicals are not expected to create hazardous or unhealthful conditions for future residents. Following compliance with the local, State and Federal regulatory framework, implementation of the Housing Element is not anticipated to create a significant hazard to the public or the environment involving the routine transport, use, or disposal of hazardous materials.

Mitigation Program: No mitigation is required.

B. 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?

Less than Significant Impact. The City's future housing needs would be accommodated within vacant land and redevelopment of previously developed sites. Therefore, construction activities from residential development anticipated by the proposed

Housing Element could release hazardous materials into the environment through reasonably foreseeable upset and accident conditions.

Demolition. Since residential development would involve urban infill and redevelopment, existing structures may need to be demolished prior to construction of new buildings. Although, specific development projects have not been identified, it is assumed that older buildings would be demolished as residential uses are redeveloped. Demolition of structures could expose construction personnel and the public to hazardous substances such as asbestos containing materials (ACM) or lead-based paints (LBP), depending on the age of the structure. Further, the potential exists that construction activities may release potential contaminants that may be present in building materials (e.g., mold, lead, etc.). In addition, the disturbance of soils and demolition of structures could expose construction workers or employees to health or safety risks in the event contaminated structures and/or soils are encountered during construction. Exposure could occur from ACM or LBP in older buildings, or unknown contaminants that have not previously been identified. Federal and State regulations govern the renovation and demolition of structures where ACMs and LBPs are present. All demolition that could release ACMs or LBPs must be conducted according to Federal and State standards. Adherence to existing regulations, which require appropriate testing and abatement actions for hazardous materials, would ensure that impacts are less than significant.

Soil and Groundwater Contamination Unknown Contaminated Sites. Grading and excavation for future development under the proposed Housing Element could expose construction workers and the public to unidentified hazardous substances present in the soil or groundwater. Exposure to contaminants could occur if the contaminants migrated to surrounding areas or if contaminated zones were disturbed at the contaminated location. Exposure to hazardous substances would be considered significant unless mitigated. Additionally, the potential exists for unidentified underground storage tanks (USTs) to be present on a development site. Removal activities could pose risks to workers and the public. Potential risks would be minimized by managing the tank according to existing Regional Water Quality Board and Department of Toxic Substances standards. Potential impacts to groundwater would be dependant on the type of contaminant, the amount released, and depth to groundwater at the time of the release. If groundwater contamination is identified, remediation activities would be required by the Regional Water Quality Control Board prior to the commencement of construction activities. Compliance with measures established by Federal, State, and local regulatory agencies is considered adequate to offset the negative effects related to the reasonably foreseeable upset and accident conditions involving the release of hazardous materials in the City.

Mitigation Program: No mitigation is required.

C. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. Future housing developments anticipated by the Housing Element would not emit or handle hazardous or acutely hazardous materials. Therefore, no impacts to school facilities would occur in this regard.

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

Less than Significant Impact. As discussed above, the potential exists that adverse environmental conditions were created by previous uses on the development sites. Also, the potential exists that some housing developments may be located on or near hazardous materials sites. Through the City's environmental review process, it would be determined if a Phase 1 Environmental Site Assessment would be needed to assess whether hazardous materials, on or within the vicinity of the future residential sites, would pose any significant hazards to the public or the environment. If necessary, mitigation would be required to reduce potential hazardous materials impacts to a less than significant level.

Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The City is currently updating its Emergency Operations Plan, with an anticipated completion date of summer of 2010. In general, this plan establishes the emergency organization, assigns tasks, specifies policies and general procedures, and provides for coordination of planning efforts of the various emergency staff and service elements utilizing the Standardized Emergency Management System (SEMS).

The use of the Emergency Operations Plan would prepare the City to prevent disasters where and when possible; reduce the vulnerability of residents to any disasters that cannot be prevented; establish capabilities for protecting citizens from the effects of disasters; respond effectively to the actual occurrence of disasters; and provide for recovery in the aftermath of any emergency involving extensive damage.

Emergency evacuation activities are coordinated by the Inglewood Police Department (IPD) and the Los Angeles County Fire Department (LACD). The IPD would coordinate all law enforcement and traffic control operations during a disaster, including activation of any public warning systems. The unpredictability of the impact of any disaster on existing streets and highways makes evacuation route designation difficult. Although the routes to be used for an evacuation would depend upon the location of the incident, assuming major streets and freeways are functional, generally the routes would include major arterials and regional routes.

The Housing Element anticipates the construction of housing units on various parcels of vacant and under-utilized land in the City. Due to the conceptual nature of the future housing development, proposals would be analyzed individually in order to address changes in traffic patterns and circulation. As conditions for approval, each project would be required to meet all City and Los Angeles County Fire Department standards and regulations pertaining to emergency response access and evacuation procedures. Upon compliance with City Fire Department guidelines, it is anticipated that the residential development anticipated by the Housing Element would not physically interfere with an adopted emergency response plan or emergency evacuation plan.

Mitigation Program: No mitigation is required.

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

Less than Significant Impact. Inglewood is a fully built out community, with minimal areas of vacant land. Wildlands adjacent to urbanized areas and residences do not exist in the City and therefore wildland fires do not represent safety hazards for residents. Residential development anticipated by the Housing Element would not expose people or structures to a significant risk involving wildland fires. Any residential development that occurs in conjunction with the Housing Element would be designed to minimize fire risks by meeting or exceeding current Fire Code requirements. Therefore, the residential development anticipated by the Housing Element would not expose people or structures to a significant risk involving wildland fires.

Mitigation Program: No mitigation is required.

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

Less than Significant Impact. The Los Angeles international Airport is approximately two miles southwest of the City of Inglewood. The southern area of Inglewood is located in the airport land use plan (ALUP) height restriction zone. However, future development anticipated by the draft Housing Element would be required to comply with the City's Airport Environs Element and the ALUP. Impacts to airport-related hazards due to the adoption of the Housing Element would be less than significant.

Mitigation Program: No mitigation is required.

F. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. There are no private airstrips located within the City of Inglewood; therefore, the proposed project would not result in any significant safety hazards from airstrip/airport related activity. The project would not cause safety hazards related to people residing or working in Inglewood. No impact would occur.

Mitigation Program: No mitigation is required.

G. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. Implementation of the draft Housing Element would not conflict with the City of Inglewood's emergency response or evacuation plans. Additionally, future development would be subject to CEQA review and be evaluated regarding interference with adopted emergency response and evaluation plans. Adoption of the Housing Element would have a less than significant impact on emergency response plans.

Mitigation Program: No mitigation is required.

19. Aesthetics

A. Will the project result in substantial diminishment or obstruction of a publicly available scenic vista, or in the creation of an offensive site visible to the public?

No impact. The project site is the City of Inglewood that consists of various sources of natural and man made light. The most visually prominent sources of man-made light in the City include Civic Center-downtown area contains daytime and nighttime lighting along with the Hollywood Park Race track, the Forum, Edward Vincent Park and Inglewood Park Cemetery. Other significant sources of light and glare are shopping areas along century Boulevard, La Brea Avenue and Manchester Boulevard. Other aesthetic elements include landscaping associated with commercial and residential projects throughout the City of Inglewood. The City's housing needs would be accommodated primarily by redevelopment, therefore, Project implementation would not be expected to cause a substantial adverse change in the aesthetic quality or character of the City.

Mitigation Program: No mitigation is required.

B. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. According to the California Scenic Highway Mapping System of the California Department of Transportation, the City does not contain a major state-designated scenic highway. The draft Housing Element designates adequate sites

within the City's boundaries that would accommodate any unmet portion of the RHNA for development. Therefore, no impact would occur.

Mitigation Program: No mitigation is required.

C. Substantially degrade the existing visual character or quality of the site and its surroundings?

Less than Significant Impact. California housing element law allows local governments to obtain construction credits toward its RHNA housing goals in three ways; housing construction, available land for housing, and housing preservation. The City will pursue each of these strategies to achieve the regional housing needs production goals. The City has set forth a strategy for addressing its housing needs by identifying areas for future residential and mixed uses within its downtown area, mixed use overlay zones and transit corridors. To minimize potential impacts, future development proposed by the draft Housing Element would be required to be in compliance with specific design guidelines set forth in the Zoning Code. Impacts to the visual character due to the adoption of the Housing Element would be less than significant.

Mitigation Program: No mitigation is required.

20. Historical Resources

Will the project impact or alter any archaeological or historical site, structure or object?

Less than significant Impact. There are numerous historical resources present in the City; refer to the General Plan Update Technical background Report and map. The City's housing needs would be accommodated primarily by redevelopment, therefore, Project implementation could cause a substantial adverse change in the significance of a historical resource. Historic resources are particularly vulnerable to redevelopment activities accompanying revitalization. The degradation or loss of historic structures or resources that would occur with General Plan implementation was determined to be less than significant with mitigation incorporated. Moreover, due to the conceptual nature of the future residential development and the known existence of historical resources in the area, proposals would require individual assessments of potential impacts to historical resources, as defined by CEQA Guidelines Section 15064.5. Through implementation of the Housing Element programs and policies the Project implementation would result in less than significant impacts to historical resources.

Mitigation Program: No further mitigation is required.

21. General Evaluation

A. Long Term.

Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less than Significant Impact. The proposed project is the City of Inglewood Housing Element, which is a policy document addressing demographic issues and local housing needs in the City for the planning period from 2008 to 2014. The Housing Element anticipates the development of 1,658 residential units to meet the regional housing needs. Due to the limited number and zoning of the remaining vacant parcels, and since future housing development would occur primarily as infill and redevelopment, Project implementation would not have a substantial adverse effect on any species identified as a candidate, sensitive, or special status. Moreover, implementation of the Housing Element would not directly remove sensitive vegetation communities or species, because the Housing Element does not infer direct development rights. Development anticipated by the Housing Element would be subject to compliance with the regulations and guidelines set forth in the City's General Plan, Municipal Code, and development review process. The City's housing needs would be accommodated primarily by redevelopment. Project implementation would be consistent with the analysis presented in the GPEIR, and would result in no greater impacts than previously identified. Moreover, due to the conceptual nature of the future residential development and the known existence of historical resources in the area, proposals would require individual assessments of potential impacts to historical resources, as defined by CEQA Guidelines Section 15064.5. Through implementation of the GP Policy and Programs, Project implementation would result in less than significant impacts to all environmental categories. Due to the limited number of remaining vacant parcels and since future housing development would occur primarily as infill and redevelopment, Project implementation is not anticipated to cause a substantial adverse change in the significance of an archaeological resource. Moreover, the residential development sites have already been subject to extensive disruption and may contain artificial fill materials. Therefore, the proposed Housing Element would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

Mitigation Program: No mitigation is required.

B. Accumulative.

Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less than Significant Impact. The proposed Project is the Housing Element for the City of Inglewood. The Housing Element is a policy document designed to aid the City in future planning, and provides the policy and regulatory mechanism to allow the market development of 1,658 residential units for the planning period 2008 to 2014. Further, due to the conceptual nature of the future residential development, proposals would require individual assessments of potential cumulative impacts. If necessary, mitigation would be required to reduce potential impacts to a less than significant level.

Mitigation Program: No mitigation is required.

C. Environmental Effects

Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact. The proposed Project is the City of Inglewood Housing Element, which is a policy document addressing demographic issues and local housing needs in the City for the Planning period from 2008 to 2014. The Housing Element provides the policy and regulatory mechanism to allow the market development of 1,658 residential units. Each individual residential Project would be evaluated for their potential direct and indirect impacts on human beings. Through the City’s environmental review process, future residential developments would be evaluated to determine their impacts for all of the issue areas cited in this document. If needed, mitigation would be required to reduce potential impacts to a less than significant level.

Mitigation Program: No mitigation is required.

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