

## CHAPTER 8

## CUMULATIVE IMPACTS

This chapter analyzes the potential for the proposed Downtown Inglewood and Fairview Heights TOD Plan to have significant cumulative impacts when combined with other past, present, and reasonably foreseeable future projects per the requirements of CEQA Guidelines Section 15130. If the effects of the proposed TOD Plan, in combination with the effects of other past, present, and reasonably foreseeable future projects will be significant, the project's incremental effects are analyzed as required by CEQA to determine if the TOD Plan's contribution to the cumulative impact is cumulatively considerable. Cumulative impacts are organized by resource topic and analyzed below.

### 8.1 DEFINITIONS

**Cumulative impacts** are defined as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (CEQA Guidelines Section 15355).

**Cumulatively considerable** means that the incremental effects of an individual project are significant when viewed in connection with the effects of past, current, and reasonably foreseeable future projects (CEQA Guidelines Section 15065(a)(3)).

### 8.2 CEQA REQUIREMENTS AND APPROACH TO CUMULATIVE IMPACTS

In accordance with CEQA Guidelines Section 15130(b), the discussion of cumulative impacts provided in this Chapter is intended to “reflect the severity of the impacts and their likelihood of occurrence.” CEQA Guidelines Section 15130(b) states that the discussion of cumulative impacts “need not provide as great [a level of] detail as is provided for the effects attributable to the project alone.” CEQA Guidelines direct that the discussion should be guided by practicality and reasonableness, and focus on the cumulative impacts that would result from the combination of the proposed project and other projects, rather than the attributes of other projects which do not contribute to cumulative impacts.

Pursuant to CEQA Guidelines Section 15130(a)(1), an EIR should not discuss cumulative impacts that do not result at least in part from the project being evaluated in the EIR. Thus, cumulative impact analysis is not provided for any environmental issue where the proposed TOD Plan would have no environmental impact. Analysis of cumulative impacts is, however, provided for all project impacts, whether they were determined to be significant and unavoidable, significant but mitigable, or less than significant.

When incorporating the impacts of past and present projects into the cumulative analysis set forth below, the currently developed portions of ongoing phased projects as they existed in the 2016 baseline year are incorporated in the environmental setting/baseline described in the individual resource sections. The portions of ongoing phased development projects that were yet to be built as of the 2016 baseline year are included as part of the analysis of cumulative impacts.

CEQA Guidelines provide two approaches to analyzing cumulative impacts (CEQA Guidelines Section 15130(b)(1)). The first is the “list approach,” which requires a listing of past, present, and reasonably foreseeable future projects producing related or cumulative impacts, including, if necessary, projects outside the control of the lead agency. The second approach relies upon projections contained in an adopted local, regional, or statewide plan or related planning document as the basis of the cumulative analysis. A reasonable combination of the two approaches may also be used.

The cumulative analysis for air quality, greenhouse gas emissions, and traffic relies on projections contained in adopted local, regional, or statewide plans or related planning documents, such as Southern California Regional Transportation Plan/Sustainable Communities Strategy and relevant regional plans developed by the Southern California Association of Governments (SCAG). The analysis of cumulative transportation impacts (and transportation-related traffic and air quality) also relies on regional traffic model travel demand estimates, which was also used to evaluate the impacts of proposed area development. The land use and socio-economic database, as well as growth forecasts for the Southern California that were described in the proposed 2016 Regional Transportation Plan/Sustainable Communities Strategy were also used in the traffic analysis. The cumulative analyses for other environmental issues use the list of projects approach. The list of reasonably foreseeable future projects within the geographic scope of the impact analyses is based upon information provided by the cities of Inglewood and Los Angeles, Los Angeles County, Los Angeles County Metropolitan Transportation Authority (Metro), and Los Angeles World Airports.

Different types of cumulative impacts occur over different geographic areas. For example, the geographic scope of the cumulative air quality analysis, where cumulative impacts occur over a large area, is different from the geographic scope considered for cumulative analysis of aesthetic resources, for which cumulative impacts are limited to specific viewsheds. Thus, in assessing aesthetic resources impacts, only development within and immediately adjacent to the Downtown Inglewood and Fairview Heights planning areas that would contribute to a cumulative visual effect is analyzed, whereas cumulative air quality impacts are based upon all development within the air basin. Because the geographic scope and other parameters of each cumulative analysis discussion can vary, the cumulative geographic scope, and the cumulative projects included in the geographic scope (when the list of projects approach is used), are described for each environmental topic.

## **8.2 LAND USE AND PLANNING POLICY**

**Would the proposed Downtown Inglewood and Fairview Heights TOD Plan, in conjunction with past, present, and reasonably foreseeable future projects, result in cumulatively considerable land use impacts?**

### **8.2.1 PHYSICAL DIVISION OF A COMMUNITY**

The cumulative study area related to community effects would include all areas within Inglewood and the areas (such as the City of Los Angeles and unincorporated County areas (such as Ladera Heights, Westmont, and Lennox) that are adjacent to the Downtown Inglewood and Fairview Heights areas.

The analysis set forth in Section 4.A, *Land Use and Planning Policy*, concludes that the proposed TOD Plan would not result in any impacts related to physical division of an established community. Pursuant to CEQA Guidelines Section 15130(a)(1), because the proposed TOD Plan would have no impacts, any cumulative impacts would not result even in part from the TOD Plan, and further analysis of cumulative impacts is therefore unnecessary.

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### 8.2.2 CONSISTENCY WITH APPLICABLE POLICIES

The geographic context for this cumulative analysis includes the City of Inglewood in relation to the City's General Plan, and the non-desert portion of Los Angeles County in relation to regional transportation and sustainable community strategy planning.

Cumulative development would result in substantial changes to existing land use patterns through conversion of underdeveloped properties and remaining vacant land to higher intensity development. Cumulative development would also be subject to site-specific environmental and planning reviews that would address consistency with adopted General Plan goals, objectives, and policies, as well as consistency with regional transportation and sustainable communities strategy policies. As part of environmental review, projects would be required to provide mitigation for any inconsistencies with local General Plan and regional transportation and sustainable communities strategy policies that would result in adverse physical environmental effects. The cumulative projects as a whole would result in a more intensely developed built environment than currently exists, and would be required to be consistent with local General Plan policies.

While cumulative projects could include General Plan amendments and/or zone changes, modifications to existing land uses that require such amendments do not necessarily represent an inherent negative effect on the environment, particularly if the proposed changes involve changes in types and intensity of uses, rather than eliminating application of policies that were specifically adopted for the purpose of avoiding or mitigating environmental effects. Past and present cumulative projects do not involve amendments that would eliminate application of policies that were adopted for the purpose of avoiding or mitigating environmental effects. Determining whether any future project might include such amendments and determining the cumulative effects of any such amendments would be speculative since it cannot be known what applications that are not currently filed might request. Due to the developed urban environment within the non-desert portion of Los Angeles County, it is anticipated that most development would be infill and transit oriented development. Additionally, all cumulative projects would be subject to applicable land use regulations and guidelines of local General Plans and all discretionary actions that would be taken by agencies throughout the non-desert portion of Los Angeles County would be subject to CEQA review. Thus, it would be expected that the land uses of cumulative projects would be consistent with policies that avoid an environmental effect; therefore, cumulatively considerable impacts from cumulative projects related to policy consistency would be less than significant.

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### 8.2.3 COMMUNITY CHARACTER

The cumulative analysis area related to community effects would include the City of Inglewood and the areas (such as the City of Los Angeles and unincorporated County areas (such as Ladera Heights,

Westmont, and Lennox) that are adjacent to the TOD Plan areas. Like the TOD Plan areas, the cumulative analysis area has long been urbanized with a mix of commercial, residential, industrial, and public facilities uses.

Because of the built out nature of the cumulative analysis area, cumulative development would be characterized as infill, and would primarily consist of increasing existing development intensities. As a result, cumulative development would reinforce the existing urban and developed character of the area. Future cumulative development would result in changes to the existing development intensities through conversion of vacant land to developed uses, as well as through the conversion of existing land uses to substantially higher development intensities. Cumulative development would also be subject to environmental and planning review that would address community character and compatibility with adjacent land uses. Each cumulative development, as adopted, would be required to be consistent with the adopted goals, objectives, and policies of the applicable General Plan, and with applicable zoning requirements. Cumulative development as a whole would result in a more intensely developed built environment than currently exists. However, because each community's General Plan sets forth policies to protect the character of existing development, including provisions calling for development patterns that include transitions from lower to higher density uses, it is anticipated that cumulative projects adopted in a manner consistent with those General Plans would not cumulatively degrade the existing character of area land uses. As a result, there would be no significant cumulative impact to which implementation of the proposed TOD Plan could contribute.

#### 8.4 POPULATION, HOUSING, AND EMPLOYMENT

**Would the proposed Downtown Inglewood and Fairview Heights TOD Plan, in conjunction with past, present, and reasonably foreseeable future projects, result in a significant population growth-inducing impact?**

The geographic context for an analysis of cumulative impacts would be Los Angeles County. As described in Section 4.B, *Population, Housing, and Employment*, past and present development projects have resulted in the population levels and housing inventory that exist for the County as of the date of this document. In the last 15 years, these developments have been within the overall population and housing projections for the County; and future County projections (shown in Table 4.B-2) indicate substantial growth projections (between 11 and 13 percent) for the County through 2040.

The proposed TOD Plan would result in development of new land uses that would, in combination with other cumulative development in the area, increase population, housing, and employment in Los Angeles County. However, SCAG's population, housing, and employment forecasts take into account all past, present, and reasonably foreseeable future development projects. Because the proposed TOD Plan is within SCAG growth forecasts, cumulative development would not result in a significant cumulative impact to which the proposed TOD Plan might contribute.

#### 8.5 AESTHETICS

**Would the proposed Downtown Inglewood and Fairview Heights TOD Plan, in conjunction with past, present, and reasonably foreseeable future projects, result in significant effects on aesthetic resources?**

### 8.5.1 SCENIC VISTAS

The cumulative aesthetics analysis area for the proposed TOD Plan is the viewshed that the TOD Plan areas lie within. As described in Section 4.C, *Aesthetics*, there are no existing scenic vistas within or nearby the TOD Plan areas. Thus, no impacts would occur. Pursuant to CEQA Guidelines Section 15130(a)(1), because the proposed TOD Plan would have no impacts, any cumulative impacts would not result even in part from the TOD Plan, and further analysis of cumulative impacts is unnecessary.

### 8.5.2 LIGHT AND GLARE

The cumulative study area for light and glare for the proposed TOD Plan areas is immediately adjacent to lands that could receive light or glare from new development within the Downtown Inglewood and Fairview Heights Plan areas, or could generate daytime glare or nighttime lighting that would be visible within the TOD Plan areas. All such areas are urban and contain a variety of sources of nighttime lighting, such as roadways, lighted parking lots, commercial and residential exterior lighting, as well as sources of daytime glare, such as glass windows on buildings. Because cumulative projects would result in more intense development than currently exists, the proposed TOD Plan, in combination with past, present, and reasonably foreseeable future projects could create significant cumulative nighttime lighting and daytime glare impacts. However, application of the City's regulations (Chapter 12 of the Inglewood Municipal Code) require compliance with light and glare performance standards that would avoid significant effects. These regulations state that lighting shall be shielded to prevent light from shining onto adjacent properties, onto public rights-of-way, and into driveway areas in a manner that would obstruct motorists' vision. With implementation of this existing Municipal Code regulation, the development that would occur by the related projects would not result in a cumulatively considerable contribution of light and glare. Thus, the cumulative effects of development from the TOD Plan in combination with cumulative projects related to light and glare are less than significant.

## 8.6 CULTURAL RESOURCES

**Would the proposed Downtown Inglewood and Fairview Heights TOD Plan, in conjunction with past, present, and reasonably foreseeable future projects, result in significant effects on cultural resources?**

Cumulative effects involving cultural resources occur as the result of multiple projects affecting cultural resources involving a resource type or theme, such as historic ethnic sites or an industry (e.g., railroads), that occur within a larger geographic context than a site-specific development project site. Thus, this analysis considers cumulative development projects that are located immediately adjacent to the Downtown Inglewood and Fairview Heights planning areas.

### 8.6.1 HISTORIC RESOURCES

Urban development that has occurred over the past several decades in the Los Angeles Basin has resulted in the demolition and alteration of historical resources, and it is reasonable to assume that

present and future development activities will continue to result in impacts on historical resources. Because all historical resources are unique and nonrenewable members of finite classes, all adverse effects or negative impacts erode a dwindling resource base. Federal and state laws and regulations protect historical resources when feasible. However, it is not always feasible to protect historical resources, particularly when an historic building has deteriorated beyond repair. For this reason, the cumulative effects of development on historical resources from cumulative projects in the region are considered significant.

Proposed TOD Plan development requirements include provisions related to preservation of historic resources. In addition, implementation of Mitigation Measure 4. D-1 would avoid demolition of historically significant structures, and require adaptive reuse of historically significant structures to comply with Secretary of the Interior Standards and thereby protect the historic integrity of the structure's façade. Thus, with the application of Mitigation Measures 4.D-1 and the applicable historic design standards in the TOD Plan, the proposed Plan's contribution to the cumulative effect to historic resources in the region would be less than cumulatively considerable.

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### **8.6.2 ARCHAEOLOGICAL RESOURCES**

Based upon existing studies documenting extensive ground disturbance and loss of cultural resources, as well as the documented, observable material culture (i.e. artifacts) recovered from the prehistoric era to the present, the Los Angeles Basin is known to have high archaeological sensitivity. For this reason, there is a possibility that ground-disturbing activities during future construction may uncover or disturb known or previously unknown archaeological resources. However, cumulative development would be required to undergo environmental review, which would establish requirements for avoidance or mitigation of impacts to known resources. In addition, the likelihood of uncovering a multiple currently unknown resources within previously developed areas sufficient to create a significant cumulative impact is extremely low. Thus, the cumulative effects of development on archaeological resources from cumulative projects in the region would be less than significant.

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### **8.6.3 PALEONTOLOGICAL RESOURCES**

Based upon the geologic history of the Los Angeles Basin, and the high paleontological sensitivity of the rock units within this region, there is always the possibility that ground-disturbing activities during future construction may uncover previously unknown paleontological resources or sites or unique geologic features. Therefore, the cumulative effects of development on paleontological resources from cumulative projects in the region are considered significant. However, cumulative development would be required to undergo environmental review, which would establish requirements for avoidance or mitigation of impacts to known resources. In addition, the likelihood of uncovering multiple currently unknown resources within previously developed areas sufficient to create a significant cumulative impact is extremely low. Thus, the cumulative effects of development on paleontological resources from cumulative projects in the region would be less than significant.

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### **8.6.4 DISCOVERY OF HUMAN REMAINS OUTSIDE A FORMAL CEMETERY**

Treatment of human remains is covered under standard regulatory requirements as set forth in the California Public Health and Safety Code and Public Resources Code. Compliance with these

regulations, which is assumed for all development in the State of California, would ensure that cumulative disturbance of human remains would not occur. Thus, the cumulative effects to disturbance of human remains from cumulative projects is considered less than significant.

## 8.7 TRAFFIC AND CIRCULATION

Would the proposed Downtown Inglewood and Fairview Heights TOD Plan, in conjunction with past, present, and reasonably foreseeable future projects, cause roadway level of service standards to be exceeded or result in an increase in transit demand that could not be accommodated by transit capacity?

### 8.7.1 CONFLICT WITH AN APPLICABLE PLAN, ORDINANCE, OR POLICY ESTABLISHING A MEASURE OF EFFECTIVENESS FOR THE PERFORMANCE OF THE CIRCULATION SYSTEM

Impacts of proposed development within the TOD Plan areas in relation to roadway levels of service, in combination with past, present, and reasonably foreseeable future development was evaluated in Section 4.E, *Traffic and Circulation*. As shown in Table 4.E-6, seven intersections are forecast to operate at unsatisfactory peak period levels of service (LOS E or worse during peak periods) under Cumulative without Project conditions, and 13 intersections would operate at unsatisfactory peak period LOS under Cumulative with Project conditions.

As discussed in Section 4.E, *Traffic and Transportation*, of this EIR, roadway level of service standards would be exceeded, and significant cumulative impacts would result under Cumulative without Project conditions. The addition of traffic from development under the proposed TOD Plan is cumulatively considerable due to the large amount of traffic and significant impacts that would result from the TOD Plan, as demonstrated in Section 4.E.

### 8.7.2 CONFLICT WITH AN APPLICABLE CONGESTION MANAGEMENT PROGRAM

Impacts of proposed development within the TOD Plan areas in relation to the County's CMP roadway network, in combination with past, present, and reasonably foreseeable future development was evaluated in Section 4.E, *Traffic and Circulation* (Impact 4.E-2).

The evaluation of Impact 4.E-2 concluded that CMP thresholds would be exceeded at two intersections, one of which could not be mitigated to less-than-significant levels (Crenshaw Boulevard/Manchester Boulevard). Because CMP thresholds would be exceeded at one intersection even after mitigation under Cumulative with Project conditions, a significant cumulative impacts would result. The addition of traffic from development under the proposed TOD Plan is cumulatively considerable due to its significant impact at that intersection.

### 8.7.3 RESULT IN A CHANGE IN AIR TRAFFIC PATTERNS

The evaluation of Impact 4.E-3 concluded that the proposed TOD Plan would result in no impact in relation to air traffic patterns. Pursuant to CEQA Guidelines Section 15130(a)(1), because the proposed

TOD Plan would have no impacts, any cumulative impacts would not result even in part from the TOD Plan, and further analysis of cumulative impacts is therefore unnecessary.

#### **8.7.4 SUBSTANTIALLY INCREASE HAZARDS DUE TO DESIGN**

The evaluation of Impact 4.E-4 concluded that the proposed TOD Plan would result in no impact in relation to hazards due to roadway design. Pursuant to CEQA Guidelines Section 15130(a)(1), because the proposed TOD Plan would have no impacts, any cumulative impacts would not result even in part from the TOD Plan, and further analysis of cumulative impacts is therefore unnecessary.

#### **8.7.5 RESULT IN INADEQUATE EMERGENCY ACCESS**

Cumulative development would be subject to site-specific environmental and planning reviews, including reviews by police and fire protection authorities that would address emergency access needs. Because all future development would be required to provide for adequate emergency access, cumulative impacts would be less than significant.

#### **8.7.6 CONFLICT WITH ADOPTED POLICIES, PLANS, OR PROGRAMS REGARDING PUBLIC TRANSIT, BIKEWAYS, OR PEDESTRIAN FACILITIES**

Cumulative development would be subject to site-specific environmental and planning reviews that would address consistency with adopted policies, plans and provisions related to public transit, bicycle facilities and pedestrian facilities. Because future development would be required to be consistent with these plans, cumulative impacts would be less than significant.

### **8.8 AIR QUALITY**

**Would the proposed Downtown Inglewood and Fairview Heights TOD Plan, in conjunction with past, present, and reasonably foreseeable future projects, result in significant effects to air quality?**

The cumulative impact analysis area for air quality is the South Coast Air Basin. The following cumulative impact analysis is based on the Program EIR for the 2016 Regional Transportation Plan/Sustainable Communities (RTP/SCS PEIR).

#### **8.8.1 CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF OF THE APPLICABLE AIR QUALITY PLAN.**

According to the RTP/SCS, buildout of the entire Southern California region would result in a less than significant air quality impact related to the potential to conflict with or obstruct implementation of the adopted AQMPs/Attainment Plans in the SCAG region. This is because the projected long-term emissions of regional growth are in alignment with the AQMPs, which is demonstrated in the transportation conformity analysis, found in the appendices to the RTP/SCS PEIR. The emissions resulting from the RTP/SCS Plan are within the applicable emissions budgets for the South Coast Air Basin for all milestone, attainment, and planning horizon years.



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**8.8.2 POTENTIAL TO VIOLATE ANY AIR QUALITY STANDARD OR CONTRIBUTE SUBSTANTIALLY TO AN EXISTING OR PROJECTED AIR QUALITY VIOLATION.****Construction Impacts**

Implementation of the proposed TOD Plan, when taken into consideration with other development and infrastructure projects within the South Coast Air Basin, would have the potential to result in a significant cumulative impact to violating an air quality standard or contributing substantially to an existing or projected air quality violation from construction emissions. This is due to the large number of construction projects that would occur within the Air Basin on a daily basis into the future cumulatively exceeding applicable impact thresholds.

Because (1) the proposed TOD Plan represents a very small portion of regional growth, (2) would build out over a 20-year time period such that Plan-related construction activities would not likely occur on a daily basis throughout the buildout period, and (3) construction impacts of the proposed TOD Plan were determined to be less than significant, the contribution of the proposed TOD Plan to the cumulatively significant regional impact would be less than cumulatively considerable.

**Operations Impacts**

Projected long-term operations emissions were determined in the RTP/SCS PEIR to have a less than significant cumulative impact because the RTP/SCS is consistent with the local air quality management plans and state implementation plans. The modeling of emissions was inclusive of all potential air emissions in the SCAG region that could occur as a result of the RTP/SCS.

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**8.8.3 RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE PROJECT REGION IS NON-ATTAINMENT**

The RTP/SCS PEIR determined that a less than significant cumulative impact would occur in relation to increasing any criteria pollutant that is in nonattainment. The RTP/SCS EIR determined that cumulative growth would not contribute to a net increase in the pollutants for which the Air Basin is in non-attainment, and would be within the emission budgets set by the AQMP and State Implementation Plan in the SCAG region.

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**8.8.4 EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS**

The RTP/SCS PEIR concluded that even with regional strategies to improve public health, a significant cumulative impact would result by exposing sensitive receptors to substantial pollutant concentrations that could harm public health outcomes. While the RTP/SCS aims to limit growth within the 500-foot buffers of freeways and high volume roadways, a small percentage of sensitive receptors would nevertheless be located within this 500-foot buffer area. The Health Risk Analysis prepared for the RTP/SCS PEIR revealed that despite a 50 to 90 percent reduction in mobile source

emissions, the cancer risk threshold as measured at the receptor locations would be exceeded at several locations.

As discussed in Section 4.F, *Air Quality*, of this EIR, the proposed TOD Plan would not place any sensitive uses within 500 feet of freeways and high volume roadways. Thus, the TOD Plan would have a less than cumulatively considerable contribution to the regionally significant impact.

#### **8.8.5 EXPOSE A SUBSTANTIAL NUMBER OF PEOPLE TO OBJECTIONABLE ODORS**

The RTP/SCS PEIR determined that because all projects would be required to comply with odor regulations as prescribed by the South Coast Air Quality Management District and local municipalities, a less than significant cumulative impact to exposing a substantial number of people to objectionable odors would occur.

### **8.9 GREENHOUSE GAS EMISSIONS**

**Would the proposed Downtown Inglewood and Fairview Heights TOD Plan, in conjunction with past, present, and reasonably foreseeable future projects, generate greenhouse gas emissions that would have a significant cumulative impact on the environment?**

Greenhouse gas (GHG) emissions impacts are assessed in a cumulative context, since no single project can cause a discernible change to climate. Climate change impacts are the result of incremental contributions from natural processes, and past and present human-related activities. Therefore, the area in which a proposed project in combination with other past, present, or future projects, could contribute to a significant cumulative climate change impact would not be defined by a geographical boundary such as a project site or combination of sites, city or air basin. GHG emissions have high atmospheric lifetimes and can travel across the globe over a period of 50 to 100 years or more. Even though the emissions of GHGs cannot be defined by a geographic boundary and are effectively part of the global issue of climate change, CEQA places a boundary for the analysis of impacts at the state's borders. Thus, the geographic area for analysis of cumulative GHG emissions impacts is the State of California.

Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006 (Nunez), recognizes that California is the source of substantial amounts of GHG emissions. The statute begins with several legislative findings and declarations of intent, including the following:

Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. 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 diseases, asthma, and other human health-related problems” (California Health and Safety Code, Section 38501(a)).

Thus, AB 32 recognizes the significance of the statewide cumulative impact of greenhouse gas emissions from sources throughout the state, and sets a performance standard for mitigation of that cumulative impact: reducing GHG emissions to 1990 levels by the year 2020 (a reduction of approximately 25 percent from forecast emission levels) with further reductions to follow.

As evidenced by the findings of AB 32 (California Health and Safety Code, Section 38501(a)), a significant cumulative greenhouse gas emission impact would result.

The analysis of greenhouse gas emission impacts under CEQA contained in this EIR effectively constitutes an analysis of a project's contribution to the significant statewide cumulative impact of GHG emissions. As evidenced by the TOD Plan's consistency with applicable plans for the reduction of GHG emissions, the contribution of the TOD Plan to significant cumulative GHG impacts is less than cumulatively considerable.

## 8.10 ENERGY RESOURCES

**Would the proposed Downtown Inglewood and Fairview Heights TOD Plan, in conjunction with past, present, and reasonably foreseeable future projects, use energy in a wasteful manner?**

The geographic context for analysis of cumulative impacts regarding energy includes past, present, and future development within southern California because energy supplies (including electricity, natural gas, and petroleum) are generated and distributed throughout the southern California region.

All development projects throughout the region would be required to comply with the energy efficiency standards in CALGREEN/Title 24 and LID requirements; additionally, some of the developments could provide for additional reductions in energy consumption by use of solar panels, sky lights, or other LEED type energy efficiency infrastructure. With implementation of the existing energy conservation regulations, cumulative electricity and natural gas consumption would not be cumulatively wasteful.

Petroleum consumption associated with the new development identified above would be primarily attributable to transportation, especially vehicular use. However, pursuant to SCAG Plans, development patterns throughout the region would provide for greater use of transit and alternative modes of transportation from development of new mixed-uses that allow residents to work, shop, and live within a small area, reducing average trip lengths, which would in turn result in lower consumption of fuels. These considerations would reduce wasteful petroleum consumption associated with unnecessary automobile trips and long commutes. State fuel efficiency standards and alternative fuels policies (per AB 1007 Pavely) would also contribute to a reduction in fuel use.

In addition, modifications to CEQA Guidelines within the next two to three years pursuant to SB 743, which would introduce substantial increases in vehicle miles travelled (VMT) as a new significance threshold under CEQA. The intent of this new threshold is to reduce VMT within the region, including increasing transit usage and decreasing per capita energy consumption for vehicular travel. Other existing regulations are likely to result in more efficient use of all types of energy, and reduction in reliance on non-renewable sources of energy over the next 20+ years. These include the federal Energy Independence and Security Act and the state Long Term Energy Efficiency Strategic Plan

(described in Section 4.H, *Energy*), which are designed to reduce reliance on non-renewable energy resources and reduce demand by providing federal tax credits for purchasing fuel-efficient items. For these reasons, the consumption of petroleum would not occur in a wasteful manner and would be less than cumulatively considerable. Overall, impacts from cumulative projects associated with energy would be less than significant.

## 8.II NOISE AND VIBRATION

**Would the proposed Downtown Inglewood and Fairview Heights TOD Plan, in conjunction with past, present, and reasonably foreseeable future projects, expose people to or generate excessive ambient noise levels, groundborne vibration, or groundborne vibration noise?**

The geographic area considered for cumulative traffic noise analysis includes the roadways examined in the transportation impact analysis and evaluated in Section 4.E, *Traffic and Circulation*, of this EIR. The cumulative development program assumed in the traffic forecasts used in the noise modeling effort includes cumulative growth over the next 20 years, as well as large projects such as the Hollywood Park redevelopment program.

### 8.II.1 EXPOSE PERSONS TO OR GENERATE NOISE LEVELS IN EXCESS OF APPLICABLE STANDARDS; TEMPORARY OR PERMANENT INCREASE IN AMBIENT NOISE LEVELS

#### Construction Impacts

Cumulative noise impacts would occur if construction activities associated with cumulative projects were to overlap in close physical proximity. Because of the low likelihood of two or more site-specific developments both being under construction simultaneously within proximity to the same sensitive use, cumulative impacts would not be significant.

#### Operations Impacts

As shown in Table 4.I-14, roadway segments where future without project noise levels range in the low 70's dBA CNEL are near commercial and office building land use zones. These noise levels are slightly higher than existing noise levels but still are classified as Conditionally Acceptable. Similarly, roadway segments where future without project noise levels that approach 65 dBA CNEL are in land use zones for residential areas, also increase above existing noise levels. The build out for the TOD Plan would increase noise levels by a maximum of 1.0 dBA CNEL, which would not exceed the noise limits in the City's Municipal Code. Thus, cumulative impacts related to traffic noise increases to sensitive receptor locations would be less than significant.

### 8.II.2 EXPOSE PERSONS TO OR GENERATE EXCESSIVE GROUNDBORNE VIBRATION OR GROUNDBORNE NOISE LEVELS

Cumulative vibration impacts principally occur from two conditions. First, a project, together with other past, present, and reasonably foreseeable development projects that include vibration-generating operational sources, could combine to expose receptors to cumulative operational

vibration impacts. The only operational source of groundborne vibration anticipated within or near the TOD Plan areas is the Metro rail line. As noted in Section 4.I-2, *Noise and Vibration*, vibration impacts from the Metro line would be less than significant. Thus, any cumulative impact related to vibration would need to include construction sources of vibration. As further discussed in Section 4.I-2, vibration from construction sources dissipates quickly over distance. Because of the low likelihood of two or more site-specific developments both being under construction simultaneously within 50 feet of a sensitive use, cumulative impacts would not be significant.

### **8.II.3 EXPOSE PEOPLE RESIDING OR WORKING IN THE VICINITY OF AN AIRPORT TO EXCESSIVE NOISE LEVELS**

The analysis set forth in Section 4.I, *Noise and Vibration*, concludes that the proposed TOD Plan would not result in any impacts related to noise levels in the vicinity of a public airport. Pursuant to CEQA Guidelines Section 15130(a)(1), because the proposed TOD Plan would have no impacts, any cumulative impacts would not result even in part from the TOD Plan, and further analysis of cumulative impacts is therefore unnecessary.

### **8.II.4 EXPOSE PEOPLE RESIDING OR WORKING IN THE VICINITY OF A PRIVATE AIRSTRIP**

The analysis set forth in Section 4.I, *Noise and Vibration*, concludes that the proposed TOD Plan would not result in any impacts related to noise levels in the vicinity of a private airstrip. Pursuant to CEQA Guidelines Section 15130(a)(1), because the proposed TOD Plan would have no impacts, cumulative impacts would not result even in part from the TOD Plan, and further analysis of cumulative impacts is therefore unnecessary.

## **8.12 HAZARDS AND HAZARDOUS MATERIALS**

**Would the proposed Downtown Inglewood and Fairview Heights TOD Plan, in conjunction with past, present, and reasonably foreseeable future projects, result in significant effects with respect to hazards and hazardous materials?**

The geographic context for analysis of cumulative impacts regarding transport of hazardous materials includes past, present, and future development within Los Angeles County, since hazardous materials from throughout the County could be transported through the TOD Plan areas.

### **8.12.1 HAZARDOUS MATERIALS**

Cumulative land use changes within the County and the City would have the potential to expose future area residents, employees, and visitors to chemical hazards through redevelopment of sites and structures that may be contaminated from either historic or ongoing uses. The severity of potential hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. However, all hazardous materials users and transporters, as well as hazardous waste generators and disposers are subject to regulations that require proper transport, handling, use, storage, and disposal of such materials to ensure public safety.

Thus, if hazardous materials are found to be present on present or future project sites appropriate remediation activities would be required pursuant to standard federal and state regulations. Compliance with the relevant federal, state, and local regulations during the construction and operation of related projects would ensure that cumulative impacts from the routine transportation, use, disposal, or accidental release of hazardous materials would be less than significant.

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#### 8.12.2 EMERGENCY RESPONSE

In regards to emergency response and evacuation plans, related projects would be required (per City construction permits and County Fire Department regulations) to provide adequate access during construction activities for vehicular, pedestrian, and bicycle circulation and emergency vehicles. In addition, new development throughout the City and the County is required to comply with the California Building Code standards, which provide for safety, access, and evacuation measures. As a result, cumulative impacts related to interference with an emergency response plan or evacuation route would be less than significant.

### 8.13 HYDROLOGY AND WATER QUALITY

**Would the proposed Downtown Inglewood and Fairview Heights TOD Plan, in conjunction with past, present, and reasonably foreseeable future projects, degrade water quality or increase flooding?**

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#### 8.13.1 WATER QUALITY

The geographic scope for cumulative impacts related to hydrology and water quality includes the Ballona Creek Watershed because the condition of the waterbody is impaired and both cumulative projects and developments pursuant to the proposed TOD Plan could incrementally exacerbate the existing impaired condition and could result in new pollutant related impairments.

Related developments within the urban and developed watershed would be required to implement LARWQCB measures pursuant to the same SWRCB Construction General Permit that requires implementation of a SWPPP (for construction), a WQMP (for operation) and BMPs for both to eliminate or reduce the discharge of pollutants in stormwater discharges, reduce runoff, reduce erosion and sedimentation, increase filtration and infiltration.

The Ballona Watershed is urban in character and largely covered with impervious surfaces. Thus, future development would not likely result in a major increase in the amount of impervious surfaces, but may increase groundwater infiltration in order to meet regional runoff permit requirements. As described in Section 4.K, *Hydrology and Water Quality*, regional permit requirements have been set by the State Water Board and implemented by the LARWQCB to reduce incremental effects of individual projects so that they would not become cumulatively considerable. Therefore, overall potential impacts to water quality associated with present and future development in the watershed would not be cumulatively considerable with compliance with all applicable laws, permits, ordinances and plans. As a result, the cumulative impact of related projects would be less than significant.

### 8.13.2 GROUNDWATER BASIN

The geographic scope related to groundwater supplies and recharge includes the West Coast Groundwater Basin because it's the groundwater basin within the project region, and provides water supplies to the City and TOD Plan areas.

As described above, groundwater rights are adjudicated in the Basin, which has regulated groundwater supplies and identifies the natural safe yield that can be withdrawn from the aquifer without adverse effect, after considering natural replenishment from runoff and precipitation. During the 2013-2014 year (which runs from June to July), the West Coast Basin had 41,060 acre-feet of water extracted, of an allowable 77,394.54 acre-feet (DWR 2014); and therefore had additional allowable pumping supply. The Watermaster's management of the adjudicated basin and the prescriptive allowable pumping rights for each agency that accesses the groundwater basin eliminates the potential of incremental increases to groundwater pumping that could result in a cumulatively considerable impact on the groundwater basin, since imported water supplies are required to maintain water balance in the basin.

As described above, the area is urban in character and largely covered with impervious surfaces. It is not likely there would be major increases in impervious surfaces as the result of future development. However, future development would potentially increase pervious surfaces in order to meet regional runoff permit requirements, which could increase water infiltration into the groundwater basin as the result of requirements for water quality management and detention of any increases in stormwater runoff. As a result, impacts related to cumulative projects and water infiltration into the groundwater basin would be less than significant.

## 8.14 GEOLOGY, SOILS, AND SEISMICITY

**Would the proposed Downtown Inglewood and Fairview Heights TOD Plan, in conjunction with past, present, and reasonably foreseeable future projects, result in significant effects with respect to geology, soils, or seismicity?**

The potential cumulative exposure of people or structures to seismic hazards (other than surface rupture of a fault) because earthquakes and their direct effects (groundshaking, liquefaction, and ground failure) tend to be regionwide in nature, even though each site-specific development has unique geologic considerations. Site-specific development projects within Inglewood would be subject to uniform site-development policies and construction standards imposed by the City. Seismic design requirements will also be applied by other communities throughout the region based on the California Building Code (CBC) and site-specific geotechnical studies prepared to define site-specific conditions that might pose a risk to safety. While increases in the number of people and structures subject to seismic hazards will be substantial over the next 20 years as the TOD Plan areas build out, given the application of CBC requirements, the cumulative effects of development related to geology and seismic hazards are less than significant.

Conversely, a watershed-wide context is considered for the analysis of the cumulative effects of potential erosion and siltation because the direct effects (turbidity, reduction of water quality, channel-

bed sedimentation) can affect all downstream reaches of a waterway system. The potential for cumulative impacts to occur is limited because all development is required to follow the California Building Code and NPDES related grading requirements. These measures are implemented as conditions of approval for project development and related project development, which are subject to continuing enforcement. As a result, it is anticipated that cumulative impacts caused by runoff and erosion from cumulative development activity would be less than significant.

## 8.15 PUBLIC SERVICES

**Would the proposed Downtown Inglewood and Fairview Heights TOD Plan, in conjunction with past, present, and reasonably foreseeable future projects, result in substantial adverse physical impacts associated with the provision of new or physically altered public service facilities, need for new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives?**

Cumulative public service impacts, including police, fire protection, schools, and libraries, would result when past, present, and reasonably foreseeable future projects combine with the proposed modernization and zero waste program to increase demand on public services facilities such that additional facilities must be constructed to maintain acceptable levels of service, and the construction of such facilities would result in a physical impact on the environment.

### 8.15.1 POLICE

The geographic context for cumulative police services is the City of Inglewood, which is the service area of the Inglewood Police Department. Numerous cumulative development projects are anticipated to occur throughout the City within the 20-year implementation period of the proposed TOD Plan. As described in Section 4.B, *Population and Housing*, SCAG estimates that Inglewood's population will increase by an overall 6.79 percent between 2020 and 2040, which will generate a proportional increase in calls for police services. As described in Section 4.M, *Public Services*, the existing Police Department facilities are anticipated to be adequate to serve the City in the future. The related projects would be reviewed by City Police Department staff prior to development permit approval to ensure adequate security measures are provided for each site-specific development in the City. Because the cumulative area is currently urbanized and future cumulative site-specific development projects would consist of infill development and redevelopment of existing underdeveloped sites, and not a physical expansion of the geography served by the police department, it is anticipated that future development would result in the need for additional sworn officers and equipment, but not a new or expanded station, the construction of which could result in an environmental impact. Therefore, cumulative impacts associated with police services would not be cumulatively significant.

### 8.15.2 FIRE PROTECTION

The geographic context for cumulative fire protection and emergency services is the service areas of the three fire stations that are serving the TOD Plan areas. Numerous cumulative development projects are anticipated to occur within the TOD Plan vicinity throughout the 20-year implementation



period of the proposed Plan. As described in Section 4.B, *Population and Housing*, SCAG estimates that Inglewood's population will increase by an overall 6.79 percent between 2020 and 2040, which will generate and proportional increase in demand for additional fire protection and emergency medical services. Like the proposed TOD Plan, cumulative projects would be reviewed by City Planning and Fire Department staff prior to permit approval and would be required to implement fire protection design features per the California Building Code and City of Inglewood Fire Code (Chapter 6, Article 1 of the Inglewood Municipal Code) regulations that would reduce potential fire hazards. Because the cumulative area is urban and developed and contains three fully staffed fire stations, and future cumulative development projects would consist of infill development or redevelopment of underdeveloped sites. The cumulative effect of new development in compliance with current fire codes could result in an overall reduction of fire hazards within the area.

As development occurs within the City, the Fire Department would continue to monitor response times to ensure the stations are operating within the established level of service standards and would add staffing and equipment as necessary. However, because of the existing geographical coverage of fire stations in the area, cumulative projects are not anticipated to result in the need for a new or expanded fire station, the construction of which could result in significant impacts. Therefore, impacts from cumulative projects associated with fire services would be less than cumulatively significant.

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### 8.15.3 PUBLIC SCHOOLS

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#### Cumulative Impacts

The geographic context for cumulative school services is the area served by the Inglewood Unified School District, which largely consists of the City of Inglewood. Numerous cumulative development projects are anticipated to occur throughout the City within the 20-year implementation period of the proposed TOD Plan that are anticipated to result in an increase of the City's population by 6.79 percent between 2020 and 2040. This increase in population will generate a proportional increase in student enrollment within the District, along with a need for new classroom seating capacity in local schools.

All new residential and non-residential development will be required to pay statutory impact fees in accordance with Government Code Section 65995(b) to the Inglewood Unified School District to help fund construction of additional classrooms and offset any additional increases in education demand at schools. Because these fees are required by law for mitigation of impacts to schools under CEQA and presumed under the law to constitute full mitigation for impacts, the cumulative impact of cumulative development on public schools would be less than significant.

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### 8.15.3 PUBLIC LIBRARIES

The geographic scope for cumulative library services is the City of Inglewood, which is the area served by the existing Inglewood library. As described in Section 4.M, *Public Services*, library usage has been declining in recent years and library service needs are changing with increasing resources being available online and the availability of high speed internet services. Therefore, new development results in a limited need for library resources/services or square footage of library space. However,

cumulative increases in population growth over time could increase the demand for library services citywide.

As described in Section 4.B, *Population and Housing*, SCAG estimates that Inglewood's population will increase by an overall 6.79 percent between 2020 and 2040, which will generate increases in demand for library services citywide. Although library use would be expected to incrementally increase by cumulative developments and result in an increased demand for library services, the City has stated that because library use has declined in the past, the Inglewood Library branches that are currently providing services would be able to meet the increased need (Library, 2016). Additionally, technology and the information available on the Internet is anticipated to increase exponentially over the timeline of implementation of the TOD Plan, which would act to limit the demands on library services.

Furthermore, the Library indicated that it may re-open the Morningside Park Library Branch (3202 W. 85th Street, which is west of the Fairview Heights TOD Plan area) that was closed in December 2010, should demand for library services increase enough to support the branch. The building is approximately 2,260 square feet. In 2006, branch's resources included approximately 19,700 books, magazines, and sound recordings, as well as Internet access, educational computer games, word processing, spreadsheet software, and an electronic encyclopedia, dictionary, and atlas materials (City, 2006). The ability to re-open this library branch would provide for expansion of library services without the need to construct new or expanded facilities that could result in an impact to the environment.

Overall, cumulative development within the City of Inglewood is not anticipated to result in the need for a new or expanded library, the construction of which could result in significant impacts. Therefore, impacts from cumulative projects associated with library services would be less than significant.

## **8.16 UTILITIES, SERVICE SYTEMS, AND WATER SUPPLY**

**Would the proposed Downtown Inglewood and Fairview Heights TOD Plan, in conjunction with past, present, and reasonably foreseeable future projects, result in significant cumulative effects associated with increased demands for utilities and service systems?**

### **8.16.1 WASTEWATER GENERATION**

Cumulative wastewater infrastructure impacts are considered on a systemwide basis, and are associated with the overall capacity of existing and planned infrastructure. The cumulative system evaluated includes City's sewer system and the conveyance system through wastewater disposal at the LACSD Joint Water Pollution Control Plant (JWPCP).

Due to the general age of the sewer system and to accommodate the increased demand for water resulting from increased development, wastewater treatment facilities have been assessed and the City is implementing a proactive sewer rehabilitation program that prioritizes and replaces sewer lines that have been identified as deficient, through its sewer inspection program (SSMP, 2015). In addition, the City performs video inspection of its entire sewer system every 5 years. Thus, the City's regular assessment, maintenance, and upgrades of the sewer system would reduce the potential of

development projects resulting in a cumulatively substantial increase in wastewater such that new or expanded facilities would be required, which could result in an environmental impact. Thus, increases in wastewater in the City's system would result in a less than significant cumulative impact.

Additionally, the JWPCP facility processes both primary and secondary treatment for an average flow of 280 mgd and a design capacity of 400 mgd (LACSD, 2016). Due to this volume of excess capacity that is designed by LACSD to accommodate future regional growth, the increase in wastewater flow from cumulative projects would not significantly impact the JWPCP. As a result, impacts related to cumulative projects wastewater treatment and conveyance capacity would be less than significant.

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### 8.16.2 WATER SUPPLY

Cumulative water supply impacts are considered on a citywide basis and are associated with the adequacy of the City's primary sources of water that include groundwater pumped through City wells, deliveries from MWD, and recycled water from the West Basin Municipal Water District.

As described above, groundwater rights are adjudicated in the Basin, which has regulated groundwater supplies. During the 2013-2014 year, the West Coast Basin had 41,060 acre-feet of water extracted, of an allowable 77,394.54 acre-feet (DWR, 2014); and therefore had additional allowable pumping supply. The Watermaster's management of the adjudicated basin and the prescriptive allowable pumping rights for each agency that accesses the groundwater basin reduces the potential of incremental increases to groundwater pumping that could result in a cumulatively considerable impact on the groundwater supplies.

In addition, as described in Section 4.N, the City's UWMP provides projections for water supply and demand through 2035, which includes MWD imported water and recycled water sources, and shows that in "Multiple Dry Water Years" (three-year) conditions with anticipated growth in the City, the City would have a surplus of 3,230 acre-feet of water annually. Furthermore, all development is required to meet water conservation goals including a 20 percent reduction in per capita demand statewide by 2020. As a result, cumulative impacts would be less than significant.

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### 8.16.3 STORMWATER DRAINAGE

The geographic scope for cumulative impacts related to stormwater drainage includes the geographic area served by the existing stormwater infrastructure for the TOD Plan areas, from capture of runoff through final discharge points. This includes pipelines and culverts that are owned and maintained by the Los Angeles County Flood Control District (LACFCD) and the City of Inglewood. Because the cumulative area is urban, developed, and is generally covered with impervious surfaces, development of cumulative projects would not result in a substantial increase in impervious surfaces in the area that could increase stormwater and runoff flows through the stormwater drainage system. In accordance with state and regional MS4, LID, and County SUSMP regulations that require development projects to maintain pre-project hydrology, no net increase of offsite stormwater flows would occur. RWQCB Permit conditions require a hydrology/drainage study to demonstrate that all runoff would be appropriately conveyed and not leave the project sites at rates exceeding pre-project conditions, prior to receipt of necessary permits. As a result, increases of runoff

from cumulative projects that could cumulatively combine to impact stormwater drainage capacity would not occur, and impacts would be less than significant.

#### 8.16.4 LANDFILL CAPACITY

The geographic scope of cumulative analysis for landfill capacity is the service area for the Sunshine Canyon Landfill, which serves the TOD Plan area. The projections of future landfill capacity based on the entire projected waste stream going to these landfills is used for cumulative impact analysis. As presented in Section 4.N, *Utilities, Service Systems, and Water Supply*, the Sunshine Canyon Landfill has a maximum permitted capacity of 12,100 tons per day takes in an average of 7,582 tons per day and would reach full capacity by 2037 (CalRecycle, 2016). After the closure of Sunshine Canyon Landfill, the following landfills listed in **Table 8-1** would be available to dispose of regional solid waste.

As shown in **Table 8-1**, based on the average disposal amount in 2014, these landfills have an average remaining daily disposal capacity of 16,145 tons. In addition, after 2020, development projects would be required to divert 75 percent (an additional 25 percent) of solid waste pursuant to AB 341. As described above, the Sunshine Canyon Landfill has an excess daily capacity of 4,518 tons per day (County, 2014), and has projected capacity through 2037.

**TABLE 8-1  
LANDFILLS IN THE TOD PLAN REGION OPEN AFTER 2037**

Landfill	Distance from Inglewood	Maximum Permitted Daily Tons	Average Daily Tonnage in 2014	Average Remaining Daily Capacity 2014 (Tons)	Expected Closure Date
Savage Canyon Landfill	25 miles	3,350	286	3,064	2055
Simi Valley Landfill & Recycling Center	40 miles	6,000	2,442	3,558	2052
El Sobrante Landfill	52 miles	16,054	6,531	9,523	2045
<b>Totals</b>	-	<b>25,404</b>	<b>9,259</b>	<b>16,145</b>	-

Source: 2014 Annual Report Los Angeles County Countywide Integrated Waste Management Plan.

Furthermore, the 2014 Annual Report Los Angeles County Countywide Integrated Waste Management Plan states that existing and planned landfill capacity would be able to accommodate the anticipated cumulative growth in the County (County, 2014). As a result, cumulative impacts related to landfill capacity would be less than significant.

## 8.17 RECREATIONAL RESOURCES

**Would the proposed Downtown Inglewood and Fairview Heights TOD Plan, in conjunction with past, present, and reasonably foreseeable future projects, result in cumulative impacts regarding the degradation of recreational facilities or the construction of new recreational facilities?**

The geographic context for cumulative recreational use impacts includes the City of Inglewood. Municipal Code Chapter 12 Planning and Zoning, Article 30, Park Land Dedication, In-Lieu Fees and

Park Development Fees requires the dedication of land at the rate of 3.0 acres per thousand persons (Municipal Code Section 12-105.5) or fees in lieu of such dedication be paid in the amount equal to each acre which otherwise would have been required to be dedicated at the median fair market value. Thus, cumulative projects within Inglewood would each be required to provide adequate parks and recreational facilities as defined in Municipal Code Section 12-105.5, or to provide fees in lieu of such dedication. Thus, adequate parks and recreation facilities would be required to satisfy cumulative demand, and cumulative impacts would be less than significant, site it would be incumbent on the City to use such finds to provide physical mitigation for recreation impacts.

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## 8.18 REFERENCES – CUMULATIVE IMPACTS

2014 Annual Report Los Angeles County Countywide Integrated Waste Management Plan. (County 2014) Accessed April 29, 2016:

<https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=3473&hp=yes&type=PDF>

Southern California Association of Governments, Final Program Environmental Impact Report for the 2012-2035 RTP/SCS, March 12, 2012. (SCAG 2016). Accessed June 3, 2016:

<http://rtpscs.scag.ca.gov/Pages/Final-2012-PEIR.aspx>

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