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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### I. LAND USE PLANNING

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#### ENVIRONMENTAL SETTING

##### Existing Land Uses

The approximate 238-acre Project Site is located at 1050 South Prairie Avenue in Inglewood, California. The Project Site is generally bounded by Prairie Avenue on the west, a vacant commercial property, residential development and Darby Park to the north, residential development to the east, and a commercial shopping center and Century Boulevard to the south (see Figure II-1, Regional and Project Vicinity Map, in Section II, Project Description).

The Project Site is currently developed with the Hollywood Park Turf Club (including the Hollywood Park Racetrack and grandstand), Casino, and adjacent surface parking areas. Photographs depicting land uses on the Project Site and immediately surrounding area are provided in Section IV.A, Aesthetics.

##### Surrounding Land Uses

The Project Site is located in a developed area which is supported by existing urban infrastructure. The surrounding area is comprised of a mix of low- to medium-density residential, commercial, and office uses. The properties immediately surrounding the Project Site are described as follows: on the north side of the Project Site is a vacant lot and the Renaissance Residential development; to the northeast of the Project Site is Darby Park (3400 West Arbor Vitae Street); to the east are single family residential uses and the Home Depot commercial shopping center; to the south (across Century Boulevard) is a commercial shopping center (the Village at Century Boulevard) and other commercial uses; and to the west (across Prairie Avenue) are several single-story retail/commercial and multi-family residential uses. (See Figure II-2, Aerial Photograph of the Project Area in Section II, Project Description.)

##### Relevant Land Use Policies

The Project Site is located within the jurisdiction of several local and regional planning agencies. At the regional level, the Project Site is located within the planning area of the Southern California Association of Governments (SCAG), the region's federally-designated metropolitan planning organization. The Proposed Project is also located within the South Coast Air Basin (SCAB) and therefore is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). As such, the Project Site is subject to SCAQMD's Air Quality Management Plan (AQMP). The Project Site is within the jurisdiction of the Regional Water Quality Control Board (RWQCB). In addition, the Project Site is subject to the Congestion Management Plan (CMP) for Los Angeles County.

At the local level, development of the Project Site is guided by the City of Inglewood General Plan (General Plan), which provides general guidelines on land use issues and planning policy for the entire City. The Project Site also falls within two constituent project areas of the Amended and Restated Redevelopment Plan (the "Redevelopment Plan") for the Merged In Town, La Cienega, Manchester-

Prairie, North Inglewood Industrial Park, Century, and Imperial-Prairie Redevelopment Projects (the “Merged Redevelopment Project Area,” each individual area, a “Constituent Redevelopment Project Area”)— the Century Constituent Redevelopment Project Area and the Manchester-Prairie Constituent Redevelopment Project Area. The Redevelopment Plan is administered by the Inglewood Redevelopment Agency (Agency). All development activity on-site is subject to the applicable land use regulations of the Inglewood General Plan, the Redevelopment Plan for the Merged Redevelopment Project Area, and the City of Inglewood Zoning Code (Chapter 12 of the Inglewood Municipal Code), and other applicable sections of the City of Inglewood Municipal Code (IMC).

### ***Regional Plans***

#### *Regional Comprehensive Plan and Guide*

The Project Site is also located within the six-county region that comprises the SCAG planning area. The City of Inglewood is located within the South Bay Cities Council of Governments (SBCCOG) subregion. SCAG’s Regional Comprehensive Plan and Guide (RCPG), adopted in 1994, serves as a policy document that sets broad goals for the Southern California region and identifies strategies for agencies at all levels of government to use in guiding their decision-making with respect to the significant issues and changes, including growth management, that can be anticipated by the year 2015 and beyond.

Adopted RCPG policies related to land use are contained primarily in Chapter 3 of the RCPG, entitled “Growth Management.” The purpose of the Growth Management chapter is to present forecasts that establish the socio-economic parameters for the development of the Regional Mobility and Air Quality Chapters of the RCPG, and to address issues related to growth and land consumption by encouraging local land use actions which could ultimately lead to the development of an urban form that would help minimize development costs, save natural resources, and enhance the quality of life in the region. Impacts associated with air quality and regional mobility are discussed in Sections IV.B (Air Quality) and IV.L (Transportation and Traffic), respectively.

Specific Growth Management Chapter policies are divided into four main categories: (1) growth forecasts; (2) improving the regional standard of living; (3) maintaining the regional quality of life; and (4) providing social, political and cultural equity. Growth Management policies that are pertinent to the Proposed Project are discussed under the “Project Impacts” subheading below.

#### *Growth Vision*

SCAG’s Compass Growth Vision, adopted in 2004, encourages better relationships between housing, transportation, and employment. The Growth Vision is driven by four key principles: (1) Mobility – Getting where we want to go, (2) Livability – Creating positive communities, (3) Prosperity – Long-term health for the region, and (4) Sustainability – Preserving natural surroundings. Additionally, the Compass Growth Vision incorporates a 2% Growth Strategy that will increase the region’s mobility by:

- Putting new employment centers and new neighborhoods near major transit systems so that people can have transportation choices other than their cars.

- Designing safe, attractive transit centers and plazas that people enjoy using.
- Creating mini-communities around transit stations, with small businesses, urban housing and restaurants all within an easy walk.

#### *South Coast Air Quality Management District*

The Proposed Project is located within the South Coast Air Basin (SCAB) and is therefore within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The most recent AQMP was adopted by the Governing Board of the SCAQMD on June 1, 2007. This AQMP, referred to as the 2007 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the Basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. Air quality impacts and consistency of the Project with the AQMP are analyzed in greater detail in Section IV.B (Air Quality) of this Draft EIR.

#### *Regional Water Quality Control Board*

The Project Site is within the jurisdiction of the Regional Water Quality Control Board (RWQCB). The RWQCB authorizes National Pollutant Discharge Elimination System (NPDES) permits that ensures compliance with wastewater treatment and discharge requirements. The Los Angeles Regional Water Quality Control Board (LARWQCB) enforces wastewater treatment and discharge requirements for properties in the project area. Water quality impacts by the Proposed Project and consistency of the Project with the RWQCB is analyzed in greater detail in Section IV.F (Hydrology/Water Quality) of this Draft EIR.

#### *Congestion Management Plan*

Within Los Angeles County, the Metropolitan Transportation Authority (MTA) is the designated congestion management agency responsible for coordinating regional transportation policies. The Congestion Management Plan (CMP) for Los Angeles County was developed in accordance with Section 65089 of the California Government Code. The CMP is intended to address vehicular congestion relief by linking land use, transportation and air quality decisions. Further, the program seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel and to propose transportation projects which are eligible to compete for state gas tax funds. To receive funds from Proposition 111 (i.e., state gasoline taxes designated for transportation improvements), cities, counties, and other eligible agencies must implement the requirements of the CMP. The Proposed Project's Traffic Impact Analysis, which is presented in greater detail in Section IV.L (Transportation and Traffic) of this Draft EIR and included as Technical Appendix G-1, was prepared in accordance with the County of Los Angeles CMP and City of Inglewood Department of Transportation (IDOT) Guidelines.

*Airport Land Use Commission (ALUC)*

The Project Site is located within 2 statute miles of two public airports; the Los Angeles International Airport (LAX), located approximately 2 miles to the west of the Project Site, and the Hawthorne Municipal Airport, located approximately 2 miles south of the Project Site.

Under Public Utilities Code Section 21670 et seq., each county in which there is an airport served by a scheduled airline and each county with an airport operated for the benefit of the general public, with certain exceptions, is required to establish an airport land use commission (ALUC). The ALUC's purpose is to coordinate planning for the area around public use airports to protect the public health, safety and welfare from land uses that do not minimize the public's exposure to excessive noise and safety hazards.<sup>1</sup> To that end, the ALUC has the power to prepare and adopt an airport land use compatibility plan, known as the Comprehensive Land Use Plan (the "CLUP"), and to review plans, regulations, or actions by a local government to ensure compatibility with the CLUP. To implement this plan, the ALUC has established provisions for safety, noise insulation, and the regulation of building height within areas adjacent to the airports. However, the authority of the ALUC is limited. The ALUC has no jurisdiction over existing land uses. Also, it does not have jurisdiction over airport operations, nor can it enact zoning requirements in cities. Instead, the ALUC sets uniform standards to "prohibit development of incompatible uses, but it is the responsibility of the cities and the County, through their planning and zoning powers, to specify which compatible uses are appropriate within their jurisdictions."<sup>2</sup>

Under Public Utilities Code Section 21676, prior to the amendment of a general plan or specific plan, the local agency must first refer the proposed action to the ALUC if the project is within the ALUC Planning Boundaries. The ALUC will determine whether the project is consistent with the CLUP. If the ALUC finds the project inconsistent with the CLUP, after a public hearing, the local government or agency may propose to overrule the ALUC by a two-thirds vote of its governing body if it makes specific findings that the proposed action is consistent with the purposes of the relevant statute, namely Public Utilities Code Section 21670 et seq.<sup>3</sup>

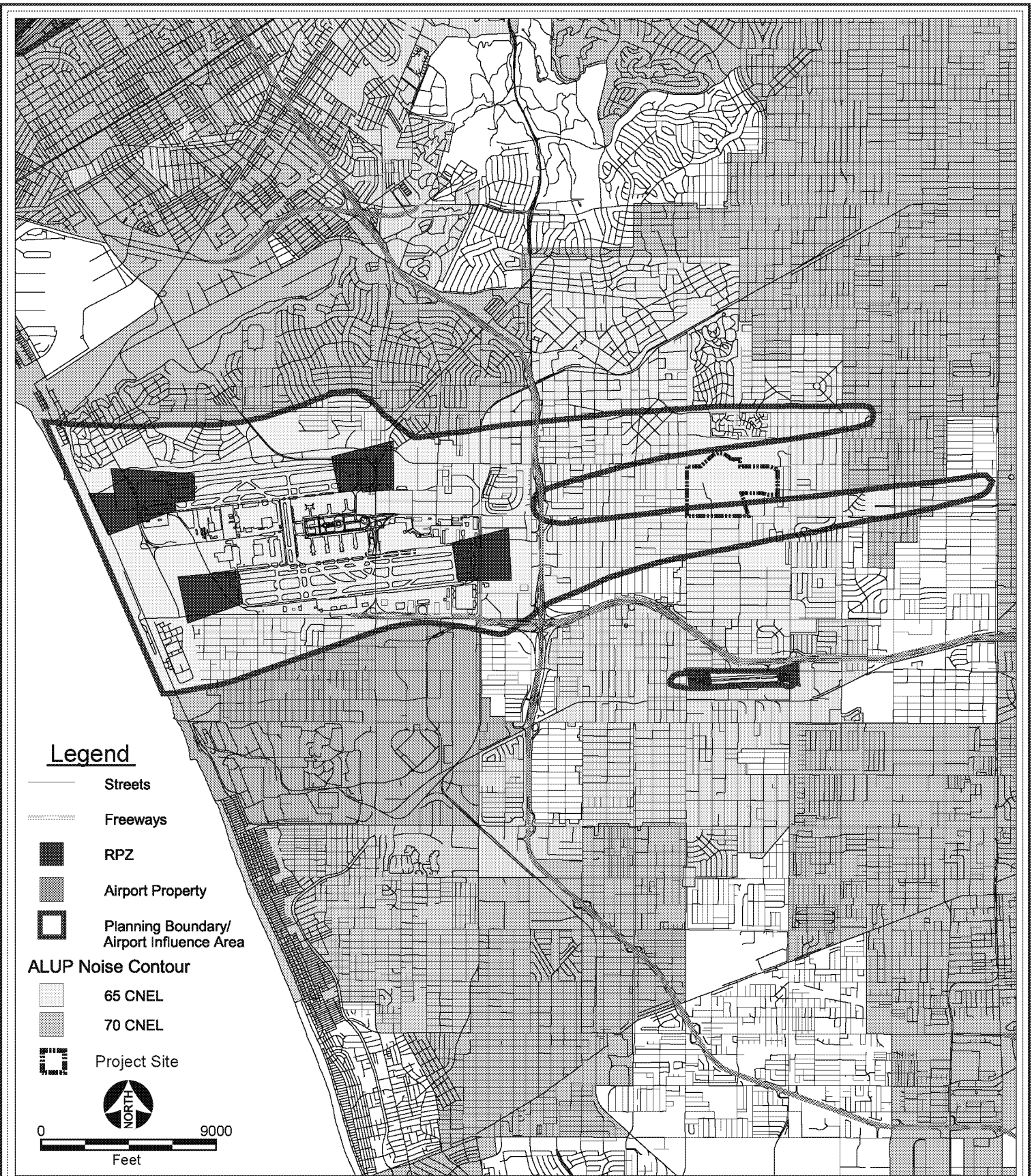
The Project Site is partially within the Planning Boundary/Airport Influence Area for the LAX airport as designated by the Los Angeles County Airport Land Use Plan. As a result, a portion of the proposed development falls within the jurisdiction and authority of the ALUC. As depicted in Figure IV.I-1, the area of the Project Site that falls within the Airport Influence Area for LAX is limited to the southern

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<sup>1</sup> *Cal. Pub. Util. Code § 21670(a)(2).*

<sup>2</sup> *Los Angeles County Airport Land Use Plan (prepared by the Department of Regional Planning), p. 2.*

<sup>3</sup> *California Public Utilities Code Section § 21676(b).*



Source: Los Angeles County Airport Land Use Commission, 5/13/03.



**CHRISTOPHER A. JOSEPH & ASSOCIATES**  
Environmental Planning and Research

Figure IV.I-1  
LAX Airport Influence Area

portion of the site along Century Boulevard. As shown in Figure IV.I-2, the Proposed Project is not located within the designated Airport Influence Area for the Hawthorne Municipal Airport.

*Assembly Bill 2776 Aviation Noise: Real Estate Disclosure*

AB 2776 requires disclosure that an airport is in the vicinity of residential property under three circumstances: (1) when a new subdivision is created (Business and Professions Code § 11010(a); (2) when a new common-interest development such as a condominium is created (Civil Code § 1353); and (3) when a “natural hazard disclosure statement” is prepared in connection with the transfer of property (Civil Code § 1103.4). Pursuant to Section 11010 of the Business and Professions Code, any person who intends to offer subdivided lands within California for sale or lease is required to file with the Department of Real Estate an application for a public report consisting of a notice of intention and a completed questionnaire that includes, among other things, the location of all existing airports, and of all proposed airports shown on the general plan of any city or county, located within 2 statute miles of the subdivision. Likewise, sellers of common interest developments and sellers of specified residential properties are also required to make disclosures regarding airport vicinity upon the transfer of that property in a declaration or in a Natural Hazard Disclosure Statement. (Civil Code Sections 1353 and 1103.4.) With respect to properties located within an airport influence area, AB 2776 (Sections 11010 of the Business and Professions Code and Sections 1353 and 1103.4 of the Civil Code) requires that the following statement be included in the specified situations:

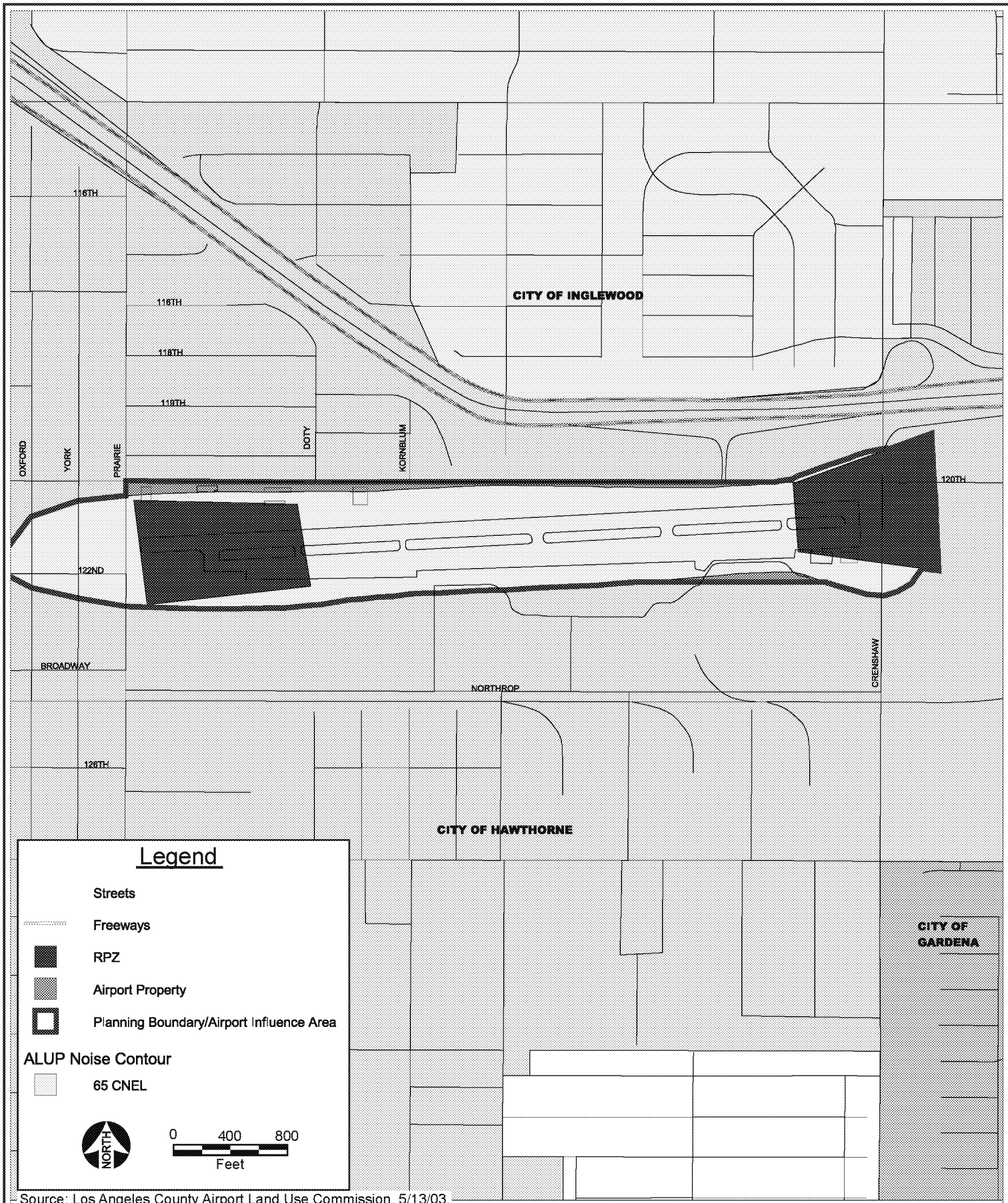
“NOTICE OF AIRPORT IN VICINITY

*This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (for example: noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what airport annoyances, if any, are associated with the property before you complete your purchase and determine whether they are acceptable to you.”*

***Local Plans***


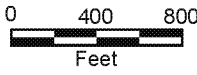
*City of Inglewood General Plan*

California State law (Government Code Section 65300) requires that each City prepare and adopt a comprehensive, long-term general plan for its future development. This general plan must contain seven elements, including land use, circulation, housing, conservation, open space, noise and safety. In addition to these, State law permits cities to include optional elements in their general plans, thereby providing local governments with the flexibility to address the specific needs and unique character of their jurisdictions. California State law also requires that the day-to-day decisions of a City follow logically from and be consistent with the general plan. More specifically, Government Code Sections 65860, 66473.5 and 65647.4 require that zoning ordinances and subdivision and parcel map approvals be consistent with the general plan.



**Legend**

- Streets
- Freeways
- RPZ
- Airport Property
- Planning Boundary/Airport Influence Area
- ALUP Noise Contour
  - 65 CNEL

Source: Los Angeles County Airport Land Use Commission, 5/13/03.

The current City of Inglewood General Plan was adopted in January 1980. It sets forth goals and policies for the future development of the City and designates the location of desired future land uses within the City. The General Plan Land Use designation for the Project Site is Commercial/Residential and Commercial/Recreational. Figure IV.I-3, City of Inglewood General Plan Land Use Designations, depicts the existing General Plan designations for the Project Site.

It should be noted that the City of Inglewood General Plan is currently in the process of being updated by the Planning Division. Six of the seven elements were adopted in the 1980s and 1990s and have not been updated since that time. Community meetings are currently being held. However, at this time a Notice of Preparation (NOP) for the General Plan Update EIR has not yet been published.

### Land Use Element

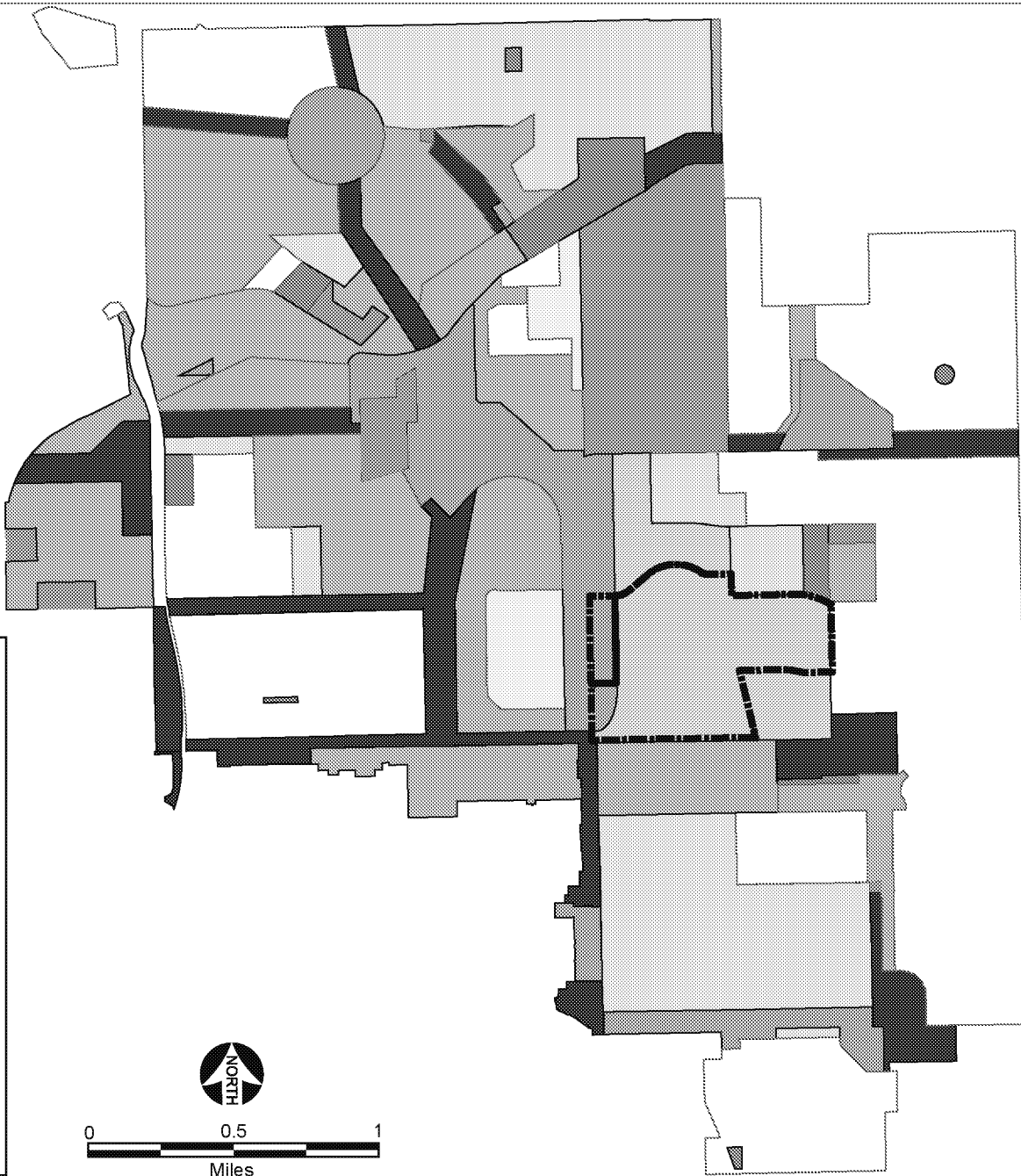
The Inglewood Land Use Element presents a long-range plan for the distribution and future use of land within the City of Inglewood. The Land Use Element analyzes population, existing and future land use requirements, and proposes implementation techniques. It provides a framework upon which the development of public and privately owned land can be based. The general goals and objectives of the City of Inglewood's Land Use Element are as follows:

- Provide for the orderly development and redevelopment of the City while preserving a measure of diversity among its parts. Allocate land in the City to satisfy the multiple needs of residents but recognize that land is a scarce resource to be conserved rather than wasted;
- Help promote sound economic development and increase employment opportunities for the City's residents by responding to changing economic conditions;
- Maximize the use and conservation of existing housing stock and neighborhoods and also facilitate development of new housing to meet community needs;
- Develop a land use element that facilitates the efficient use of land for conservation, development and redevelopment; and
- Promote Inglewood's image and identity as an independent community within the Los Angeles Metropolitan area.

As discussed above and shown in Figure IV.I-3, the Project Site is designated for "Commercial/Residential" and "Commercial/Recreational" land uses in the General Plan. The goals and objectives for the commercial land use designation as identified in the Land Use Element are as follows:

- Create and maintain a healthy economic condition within the present business community and assist new businesses to relocate within the City;













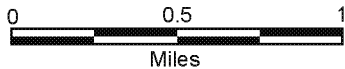


Legend

 Project Site

**General Plan**

-  LOW DENSITY:0-6 D.U./AC.
-  LOW MEDIUM DENSITY:7-22 D.U./AC.
-  MEDIUM DENSITY:23-43 D.U./AC.
-  COMMERCIAL
-  COMMERCIAL/RESIDENTIAL
-  COMMERCIAL/RECREATIONAL
-  INDUSTRIAL
-  PUBLIC/SEMI-PUBLIC
-  HOSPITAL-MEDICAL/RESIDENTIAL
-  OPEN SPACE



- Protect local businessmen and encourage the importance of maintaining a strong commercial district in the downtown;
- Improve the visual appearance and economic condition of the existing arterial commercial development along Inglewood's major streets;
- Encourage the continued development and promotion of existing commercial centers such as Crenshaw-Imperial and Morningside Park;
- Continue to promote the development of high quality commercial office space at appropriate locations within the City through the redevelopment process; and
- Promote the development of commercial/recreational uses which will complement those which already are located in Inglewood.

The goals and objectives for the residential land use designation as identified in the Land Use Element are as follows:

- Encourage neighborhood stability and conservation by reducing the amount of land designated for high density development;
- Promote the maintenance, rehabilitation, and modernization of the City's housing stock;
- Encourage the preservation of Inglewood's fair share of housing for low and moderate income persons;
- Safeguard the City's residential areas from the encroachment of incompatible uses;
- Foster the revitalization or, if necessary, the recycling of residential areas which cannot provide a decent living environment because of jet noise impact;
- Encourage suitable condominium development as a means of diversifying types of housing and increasing the number of residents who own property; and
- Promote residential developments which will attract middle and upper income families who can afford the higher cost of recycled development.

### Conservation Element

The Conservation Element of the City of Inglewood General Plan, adopted October 21, 1997, addresses the plan for conservation, development and utilization of natural resources found within the jurisdiction of the City. Chapters II through VI of the Conservation Element address resource conservation and management and contain several goals, objectives, and policies that may be pertinent to the Proposed Project. Key goals, objectives, and policies of the Conservation Element include:

- Protect aquifers and water sources (which includes prevention of contamination of ground water by surface contaminants leaching into the soil);
- Reduce the ever-increasing demand being placed on the aquifers and on the statewide water sources (with the greatest opportunity to reduce water demand will be a greater utilization of reclaimed water);
- Compliance with the National Pollutant Discharge Elimination System (NPDES); and
- Compliance with the Air Quality Management Plan.

For a full discussion of the conservation issues associated with the Proposed Project, see Sections IV.B (Air Quality), IV.F (Hydrology/Water Quality) and IV.D (Hazardous Materials/Risk of Upset) of this Draft EIR.

#### Housing Element

The Housing Element of the City of Inglewood General Plan, which was adopted by the California Department of Housing and Community Development (HCD) in 2005, provides additional guidance on housing and economic development issues against which potential development must be considered. A complete discussion of the population and housing impacts of the Proposed Project is provided in Section IV.H (Population, Housing, & Employment) of this Draft EIR.

#### Noise Element

The Noise Element of the City of Inglewood General Plan, adopted September 1, 1987, is designed to manage noise within the City and to protect sensitive uses from excessive noise-related impacts. Noise-sensitive uses generally include residential dwellings, medical care facilities, hotels, houses of worship, parks, and schools, among others. The goals of the Noise Element which are applicable to the Proposed Project are to protect and maintain those areas having acceptable noise environments and to provide sufficient information concerning the community noise levels so that noise can be objectively considered in land use planning decisions. The Noise Element also contains several objectives and policies on noise management which are pertinent to the Proposed Project. These objectives and policies are identified below and are further analyzed under the “Project Impacts” subheading of this Land Use Section.

- Incorporate noise considerations into land use planning decisions;
- Ensure acceptable noise levels near schools, hospitals, convalescent homes, and other sensitive areas; and
- Encourage acoustical design for new construction.

A complete analysis of the noise impacts of the Proposed Project is contained in Section IV.F (Noise) of this Draft EIR.

### Safety Element

The Safety Element of the City of Inglewood General Plan, adopted July 1995, contains goals, objectives, and policies which are designed to ensure that the citizens of Inglewood can be protected from unreasonable risks caused by natural and manmade disasters. The purpose of the Safety Element is to:

*“...minimize the dangers associated with natural and manmade hazards by implementing standards, regulations and laws that will reduce loss of life, injuries and property damage resulting from disasters, and to provide for the continuity of government operations and civilian life during and after a major disaster.”*

The Safety Element has several objectives and policies which are pertinent to the Proposed Project. These objectives and policies are identified below and are further analyzed under the “Project Impacts” subheading of this Land Use Section.

- Provide measures to reduce seismic impacts.
- Restrict new structures for human occupancy from being constructed across active faults; and
- Require geological and soils engineering investigations in high risk fault areas.

### Circulation Element

The Circulation Element of the City of Inglewood General Plan, adopted December 15, 1992, is designed to require that adequate street access and traffic capacity is considered for current and future land use needs. There are three broad themes running throughout the Circulation Element which include presenting and analyzing existing street measures and possible corrective measures, a discussion of additional modes of transportation, and an evaluation of Inglewood’s street environment and its possible enhancement. For a depiction of the circulation plan for the Proposed Project, see Figure II-8 “Conceptual Circulation Plan.” For a full discussion of the transportation and traffic issues associated with the Proposed Project, see Section IV.L (Transportation/Traffic) of this Draft EIR.

### Open Space

The Open Space Element of the City of Inglewood General Plan, adopted December 1995, is a plan to address the current and future recreation needs of the City for parkland and recreational facilities and for the conservation of open space.

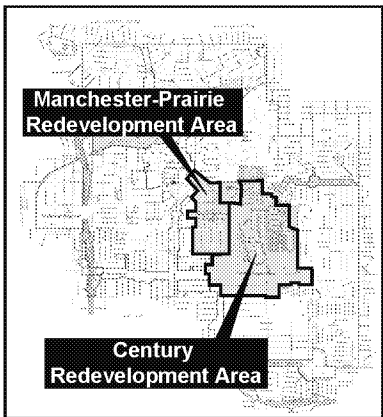
The purpose of the Open Space Element is two-fold. First, it is a plan to address the current and future recreation needs of the community for park and recreation facilities. Second, it is a plan for the conservation or creation of open space to mitigate the effects of the increasing urbanization of Inglewood. With respect to policies and objectives pertinent to park and recreation facilities, see Section IV.K.4, Public Services (Recreation and Parks). In regards to open space areas, the Open Space Element identifies two land use patterns that are represented on the Project Site: (a) parking lots and (b) earthquake fault zones. Although often viewed as an expanse of asphalt, parking lots can provide a major source of visual open space. The surface parking lot for the Hollywood Park Race Track and Casino is cited as one of the most notable expanses of open space within the City. Earthquake fault zones are generally excluded from being built upon and are accompanied by building setbacks and transitional land uses. The trace of the Potrero Fault Zone (part of the Newport Inglewood Fault System) crosses the eastern portion of the Hollywood Park Project Site, creating a sloping escarpment. As an area of increased seismic hazard, the Open Space Element suggests that this area not be built upon and should remain as some form of open space, either as a private greenbelt or play area within any future development of the site, or possibly as an addition to abutting Darby Park. For further discussion of the seismic issues related to the Proposed Project, see Section IV.C, Geology/Soils.

#### *The Merged Redevelopment Project Area*

The City of Inglewood has adopted six redevelopment projects over a 23-year period. On July 16, 1996 the City Council merged the six redevelopment projects (“Merged Inglewood Redevelopment Project” or (“Merged Project Area” each individual area, a “Constituent Redevelopment Project Area”), and amended and restated the existing redevelopment plans by adopting one redevelopment plan applicable to all six merged redevelopment projects known as the “Amended and Restated Redevelopment Plan for the Merged In Town, La Cienega, Manchester-Prairie, North Inglewood Industrial Park, Century, and Imperial-Prairie Redevelopment Projects” (the “Merged Redevelopment Project”). The Merged Project’s basic objectives are to eradicate the blighting influences within the Redevelopment Project Area, redevelop incompatible land uses and revitalize existing development to obtain and be consistent with the environmental, social, and economic goals of the community. As shown in Figure IV.I-4, the Project Site is located within portions of the Century Constituent Redevelopment Project Area and the Manchester-Prairie Constituent Redevelopment Project Area. A discussion of the Constituent Redevelopment Project Areas is provided below.

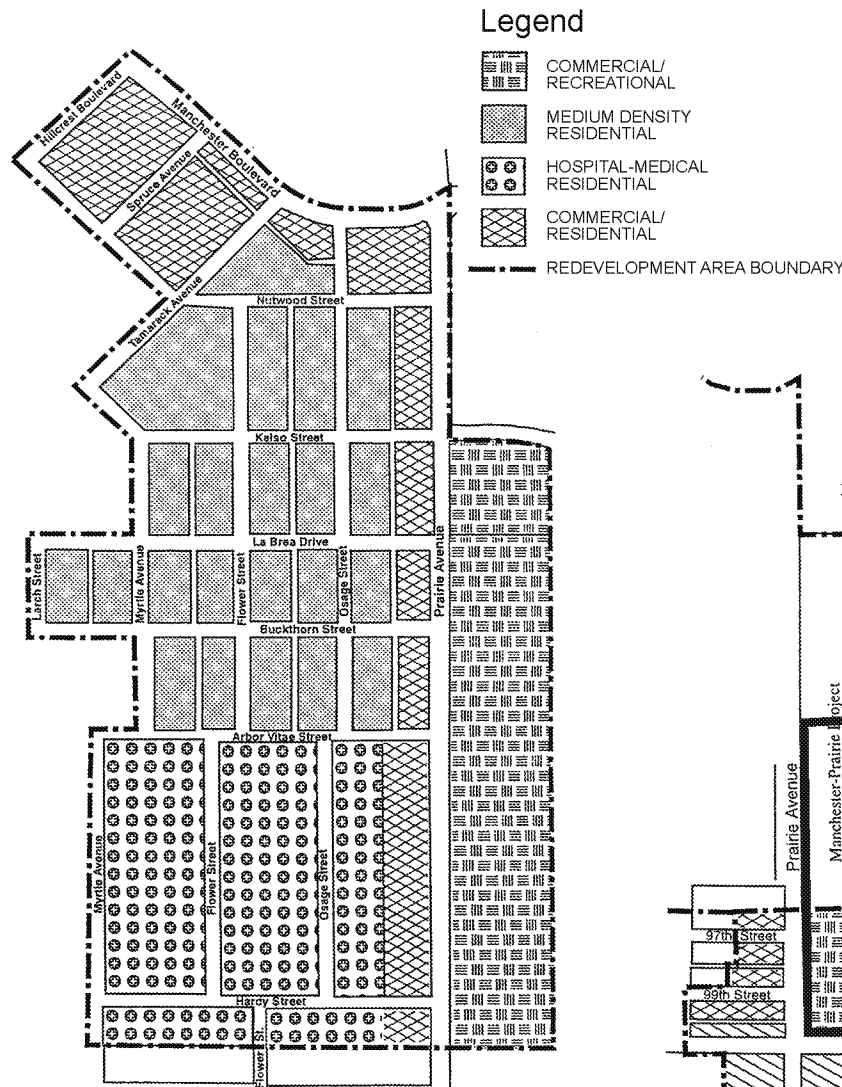
#### Century Constituent Redevelopment Project Area

The Project Site is located in a portion of the Century Constituent Redevelopment Project Area, which encompasses 483 acres of development including residential, commercial/retail, and industrial land uses. The Century Constituent Redevelopment Project Area is generally bounded by Prairie Avenue to the west, Manchester Boulevard to the north, Crenshaw Boulevard to the east, and 102<sup>nd</sup> Street to the south. The Century Project Area, adopted in July 1981 and most recently amended February 26, 2002, provides the Agency with powers, duties, and obligations to implement and further the redevelopment, rehabilitation, and revitalization of the Century Constituent Redevelopment Project Area. Redevelopment



CITY OF INGLEWOOD REDEVELOPMENT LOCATION AREA MAP

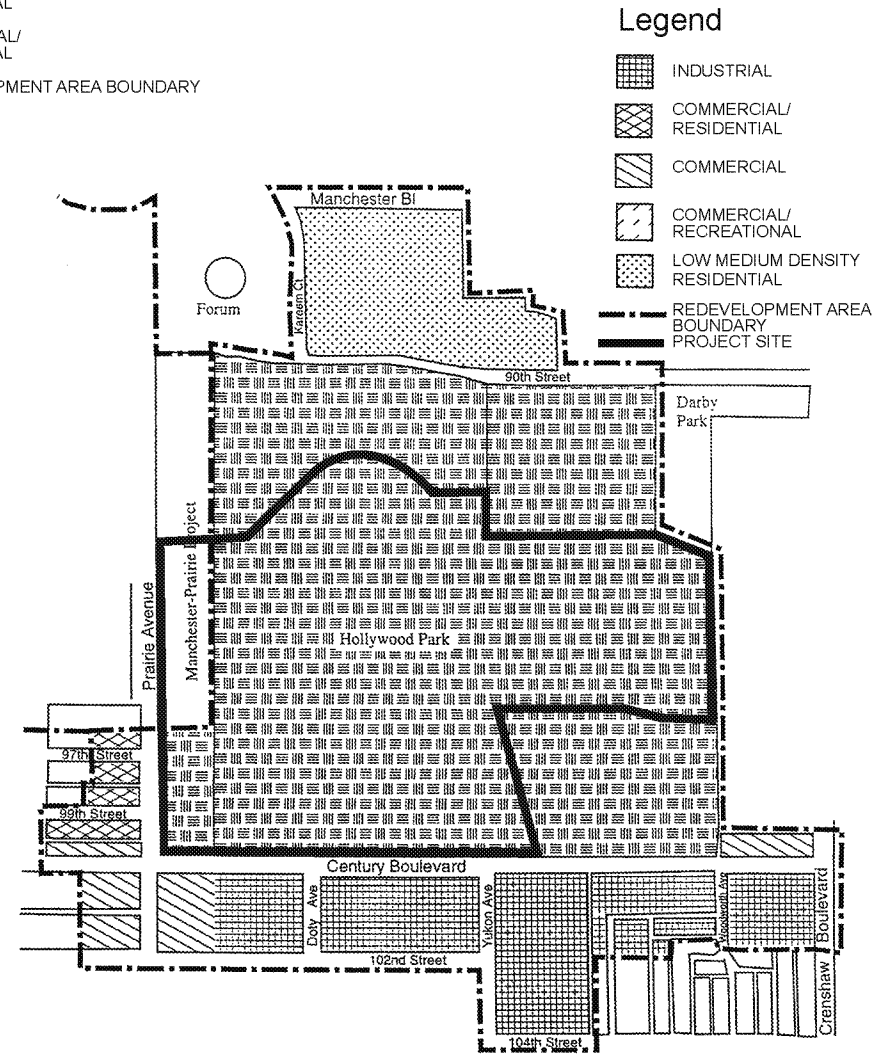
### Manchester-Prairie Redevelopment Plan Map



#### Legend

- COMMERCIAL/RECREATIONAL
- MEDIUM DENSITY RESIDENTIAL
- HOSPITAL-MEDICAL RESIDENTIAL
- COMMERCIAL/RESIDENTIAL
- REDEVELOPMENT AREA BOUNDARY

### Century Redevelopment Plan Map



#### Legend

- INDUSTRIAL
- COMMERCIAL/RESIDENTIAL
- COMMERCIAL
- COMMERCIAL/RECREATIONAL
- LOW MEDIUM DENSITY RESIDENTIAL
- REDEVELOPMENT AREA BOUNDARY
- PROJECT SITE



Source: City of Inglewood, 2002.

of the Century Constituent Redevelopment Project Area will attain the purposes of the California Community Redevelopment Law through addressing:

*“issues related to the prevalence of deteriorating conditions and under-utilization of a large part of the area, particularly properties along the major corridors. Some of the more critical issues centered on dilapidated housing stock, lack of investment, numerous vacant properties and buildings, inadequate public improvements, high crime rates, and substandard traffic and circulation improvements.”<sup>4</sup>*

For discussion of Community Redevelopment Law and Proposed Project’s contributions to affordable housing requirements, see Section IV.H, Population, Housing & Employment.

#### Manchester-Prairie Constituent Redevelopment Project Area

The Project Site is located in a portion of the Manchester-Prairie Constituent Redevelopment Project Area, which encompasses 200 acres of development including residential, commercial, and institutional land uses. It is generally bounded by Manchester Boulevard to the north, Prairie Avenue to the east, Hardy Street to the south, and Myrtle and Larch Streets to the west. The Manchester-Prairie Constituent Redevelopment Project Area provides the Redevelopment Agency with powers, duties, and obligations to implement and further the redevelopment, rehabilitation, and revitalization of the Manchester-Prairie Constituent Redevelopment Project Area. Redevelopment of the Manchester-Prairie Constituent Redevelopment Project Area will attain the purposes of the California Community Redevelopment Law as it was established for the following reason:

*“Issues related to economic deterioration, improper and irregular lot shapes, inadequate parking, provision of public facilities and improvements to support residential neighborhoods, and obsolete land use patterns created the need to establish the Manchester Prairie Redevelopment Project Area.”<sup>5</sup>*

For discussion of Community Redevelopment Law and Proposed Project's contributions to affordable housing requirements, see Section IV.H, Population, Housing & Employment.

#### *City of Inglewood Municipal Code/Zoning*

The development of the Proposed Project is also governed by the applicable land use, zoning, and subdivision regulations in the Inglewood Municipal Code (IMC), particularly Chapter 12, Planning and

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<sup>4</sup> City of Inglewood, Redevelopment Agency, Century Project Area, website: [http://www.cityofinglewood.org/depts/commdev/redevelopment/project\\_areas/century.asp](http://www.cityofinglewood.org/depts/commdev/redevelopment/project_areas/century.asp), April 13, 2007.

<sup>5</sup> City of Inglewood, Redevelopment Agency, Manchester-Prairie Project Area, website: [http://www.cityofinglewood.org/depts/commdev/redevelopment/project\\_areas/manchester\\_prairie.asp](http://www.cityofinglewood.org/depts/commdev/redevelopment/project_areas/manchester_prairie.asp), April 13, 2007.

Zoning. Chapter 12 includes the development standards for the various zoning districts in the City of Inglewood.

#### Allowable Uses

The Project Site is currently zoned with a C-R (Commercial and Recreation) zoning designation. Figure IV.I-5 depicts the existing zoning designations for the Project Site and the surrounding area. Pursuant to IMC Section 12-27, the C-R zoning designation permits the following types of land uses: animal exhibits (i.e. circuses, petting zoos, animal shows, bird shows, animal auctions and sales), animal competitions and shows (i.e. horse racing, harness racing and equestrian shows), athletic events (professional and amateur), social events (i.e. dances, charity benefits and balls), entertainment events (i.e. movies, closed circuit television, musicals, singing groups, talent acts, ice shows and water shows), banquets and dining events (political, public, charity, private, educational and charitable), conventions and conferences, exhibits (business, industrial and professional), movie sets and locations, live telecast and filming of commercials and documentaries, recreation and leisure events including: vehicular competitive events, children's activities (i.e. carnivals, fairs, animal rides, and amusement rides), game and video arcades, gaming clubs, public parking (surface, subsurface, and structures), and accessory uses and buildings, meaning those uses associated with the efficient operation or conduct of any of the permitted uses.

Supplementary uses are also permitted within the C-R Zone, subject to the approval of the Community Development and Housing Department. Supplementary uses that may be approved include hotels, motels (200 rooms or more per structure); restaurants (400 seats or more per structure); office buildings (50,000 square feet of floor area per structure); accessory commercial uses provided they are an integral part of the development of the above uses; and governmental facilities, excluding schools, storage yards, or maintenance yards.

#### Allowable Height Limit, Lot Area, and Setbacks

Per IMC Section 12-27.5, the maximum allowable height for the C-R Zone is one hundred fifty (150) feet in height from natural grade. As described in IMC Section 12-27.7, a lot must contain at least one (1) acre or forty-three thousand five hundred sixty (43,560) square feet of area. In addition, if said lot has a frontage on a dedicated public street it shall be no less than one hundred (100) feet. Furthermore, pursuant to IMC Section 12-27.4, the C-R setback requirements are thirty (30) feet within any property line within this zone. The setback areas shall be used only for landscaping or landscaped parking areas and subterranean parking.
























As described in IMC Section 12-27.8, no new development within the C-R zone shall be erected, located or placed within two hundred (200) feet of any single-family residential zone and no new stables or animal shelters shall be erected, located or placed within five hundred (500) feet of any single-family residential zone.

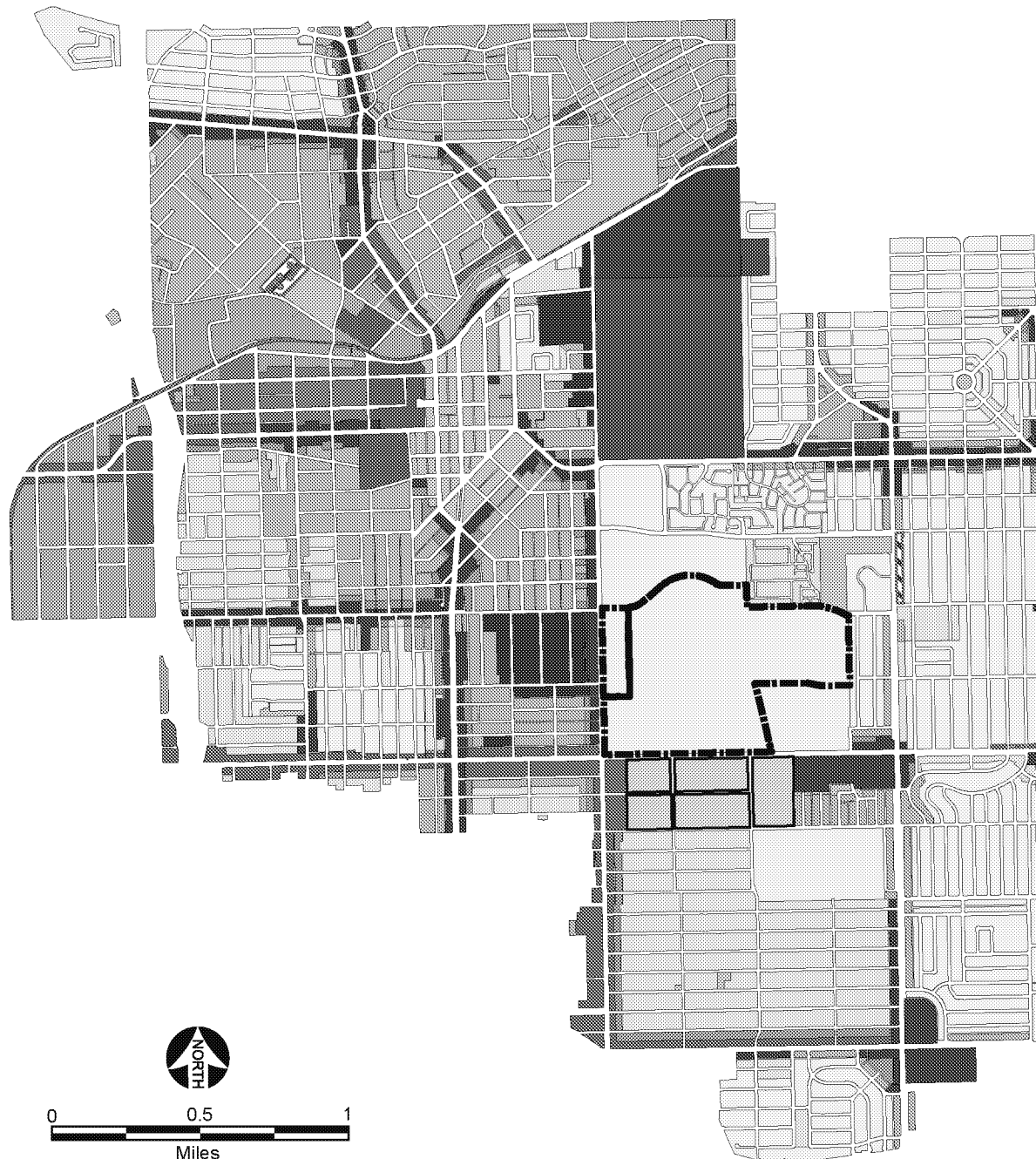


**Legend**

 Project Site

**ZONING**

-  C-1
-  C-2
-  C-2A
-  C-3
-  C-C
-  C-R
-  C-S
-  M-1
-  M-1L
-  M-2
-  O-S
-  P-1
-  R-1
-  R-1.5
-  R-1Z
-  R-2
-  R-2A
-  R-3
-  R-4
-  R-M
-  S-1
-  S-2
-  T-C



## ENVIRONMENTAL IMPACTS

### Methodology

#### *Land Use Consistency*

The following land use analysis addresses the Proposed Project's potential to physically divide an established community or conflict with applicable land use plans, policies, and regulations or an adopted habitat conservation or natural community conservation plan. This analysis aims to identify any potential conflicts with applicable plans, policies or regulations resulting from approval of the proposed Specific Plan, or from the physical changes to the environment that would occur as a result of project implementation.

#### *Urban Decay - Blight*

In order to assess the project's potential to result in urban decay or blight, HR&A Advisors Inc., conducted an economic and fiscal impact assessment of the Proposed Project. The following summarizes the methodology and findings of the economic impact assessment prepared by HR&A Advisors Inc., dated June 2, 2008.

The urban decay assessment measures the degree to which the operation of the Proposed Project's retail and related commercial uses could result in a significant adverse economic impact on existing and proposed retail developments in the same market area. Methodologically, any such impact is identified and measured by assessing the degree to which the amount of space planned for development in each of the Project's retail and other use categories would exceed the anticipated increase in the supportable amount of retail and other commercial space that can be supported, based upon the anticipated growth in future customer demand for comparable activities in defined market areas. If the Proposed Project's supply of such space exceeds the anticipated growth in demand, it would suggest that the Project could attract sales away from other existing or planned new business establishments of the same type. Such a finding, in turn, would require further investigation to assess whether it is reasonably foreseeable that this potential attraction of sales away from other businesses could result in disinvestment, business closures, abandonment, and/or other forms of physical deterioration that are indicators of "urban decay." If, on the other hand, the amount of retail and other commercial space planned for the Project is equal to or less than the amount of space that can be supported by projected future demand, it can be concluded reasonably that the scale of potential customer demand is sufficiently large enough that it can support both the Project and all other existing and planned space proposed for those same general use categories. There would be no need, therefore, to further evaluate the potential for urban decay associated with the Project. The report summarizing the findings is included as Appendix I.

Making these economic impact measurements typically requires: (1) establishing logical market areas appropriate for retail and other related uses for which space will be provided in the Project; (2) projecting the likely increase in customer demand based on population growth, income growth and spending patterns for retail and other related uses over the time period to stabilized Project operation (i.e., 2018); (3)

converting the projected changes in future customer demand to amounts of supportable retail and other types of commercial space measured in square feet of gross leasable area (GLA) or other appropriate units of analysis; and (4) making a comparison of the projected change in demand in the form of supportable space with the change in supply as represented by the increase in GLA or other measures proposed for the Project and other developments in the relevant market area(s).

Application of the assessment methodology described above relied on a market analysis for the Project's retail component that was prepared by Thomas Consultants for Wilson Meany Sullivan ("Market Study").<sup>6</sup> The Market Study includes an assessment of 42 nominally competitive retail facilities in Inglewood and elsewhere within about a 20-mile radius of the Project site (including street front retail concentrations, neighborhood retail centers, community retail centers, regional retail centers, super-regional retail centers, power centers, and hybrids of these traditional retail categories), delineation of a Primary Trade Area and a Secondary Trade Area around the Project Site, documents the current and projected future demographic characteristics of the Trade Areas, and estimates the scale of supportable floor area by retail and related use than can be captured by the Project.

### **Thresholds of Significance**

In accordance with Appendix G of the State CEQA Guidelines, a project may have a significant environmental impact if it were to:

- (a) Physically divide an established community;
- (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, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or
- (c) Conflict with any applicable habitat conservation plan or natural community conservation plan.

In addition to the threshold questions identified in Appendix G of the State CEQA Guidelines, the courts have recognized that there is a potential for proposed new retail and related commercial development to trigger economic competition with existing retailers and related uses in the project's host community.<sup>7</sup> If existing retailers and other uses are adversely affected by this competition, declines in sales could directly result in and/or lead to disinvestment, business closures, abandonment and other forms of physical deterioration that are indicative of "urban decay." If the severity of this change in physical circumstances is so substantial that it adversely affects appropriate use of the area or otherwise threatens the public health, safety or general welfare, this situation may cross a threshold that defines a "significant impact" under CEQA. Therefore, a significant land use impact would occur if the economic impacts of the

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<sup>6</sup> Thomas Consultants, Inc., *Hollywood Park Retail Opportunity Assessment*, February 2006.

<sup>7</sup> See, for example, *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4<sup>th</sup> 1184.

Proposed Project compete with local retailers to the extent that results in the potential for urban decay or blight.

### **Impacts Determined to be Less Than Significant**

With respect to threshold (c) above, because the Project is located in an urban area and is zoned for residential and commercial land uses this would not apply. Accordingly, no further analysis of this question is warranted.

### **Project Impacts**

The Proposed Hollywood Park Redevelopment Project will include a General Plan Amendment, amendment to the Merged Redevelopment Plan to update the Manchester-Prairie and Century Constituent Redevelopment Project Areas Maps and land use designations, adoption of the Hollywood Park Specific Plan, a Zone Change, and approval of Vesting Tentative Tract Map(s). The proposed Preliminary Land Use Plan, Building Heights Limit Map and Conceptual Circulation Plan are included in Figures II-4, II-7, and II-8, respectively in Section II, Project Description. Impacts related to land use consistency with current zoning and adopted plans and compatibility with existing land uses are addressed in greater detail below.

#### *Land Use Compatibility*

The residential, retail, commercial office, hotel, civic, open space and casino/gaming uses that are proposed within the Hollywood Park Redevelopment Project are substantially consistent with the surrounding land uses. The Proposed Project, however, through the adoption of a Specific Plan and a change in the zoning standards, will provide a comprehensive land use plan to establish specific land use zones and development standards to provide a vibrant mixed-use environment. The existing Hollywood Park Grandstand and associated track lighting and surface parking lots would be demolished and replaced with an arrangement of commercial office, retail, residential, civic, hotel, open space and casino/gaming land uses. The planned uses would be more compatible than the existing recreational use that currently occupies the Project Site, as the scale and massing of the structures within the planned development would be consistent with the low to mid-rise commercial and residential structures that exist in the immediate area. Land use compatibility impacts would therefore be less than significant.

The Proposed Project would not physically divide an established community. The existing Hollywood Park Racetrack and Casino facility is bounded by residential uses to the north and east, vacant land and the Forum to the north, and commercial land uses to the west and south along Prairie Avenue and Century Boulevard, respectively. The demolition of the existing horse racing-related land uses on the Project Site would not physically divide an established community, as no dwellings or dwelling units are currently

located on the Project Site.<sup>8</sup> The adjacent land uses would continue to exist and operate as they currently do under the existing land use configuration. The addition of retail and entertainment uses in the Mixed-Use area of the Project Site would provide compatible land uses near the existing casino. As compared to the compatibility of the existing uses (i.e. horse racing), the Proposed Project would result in a net beneficial impact with respect to blending existing residential and commercial uses with the proposed development. Therefore, the Proposed Project would have a less than significant impact on the existing communities surrounding the Project Site since it would not physically divide an established community.

**Consistency with Regional Land Use Policies and Regulations**

*Regional Comprehensive Plan and Guide*

The Regional Comprehensive Plan and Guide (RCPG) includes several policies which are generally applicable to the Proposed Project. Consistency and compatibility of the Proposed Project with these policies is discussed in Table IV.I-1. As Table IV.I-1 demonstrates, the Proposed Project is substantially consistent with the goals and polices contained in the RCPG and thus would have a less than significant effect on RCPG policies.

**Table IV.I-1  
Comparison of Project Characteristics to RCPG Policies\***

Growth Management Policies	Consistency of the Proposed Project
<b><i>Growth Forecast Policies:</i></b>	
The population, housing and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.	The Proposed Project is consistent with the jobs forecasts, but is technically inconsistent with the population and housing forecast data provided by SCAG. However, on a regional basis, the region can support more housing given the level of jobs in the region. The creation of housing by the Proposed Project is consistent with the goals of the region to locate housing in close proximity to jobs, although technically inconsistent with the specific growth allocated to Inglewood. Moreover, as an infill redevelopment project that requires General Plan and Redevelopment Plan Amendments, adoption of a Specific Plan, and a zone change, this site was not reasonable foreseen as potential site for creating housing at the time the most current growth projections were being prepared(see Section IV.G, Population, Housing & Employment).
<b><i>Policies to Improve the Regional Standard of Living:</i></b>	
SCAG shall encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities.	The Proposed Project would redevelop the existing 238-acre Hollywood Park Turf Club and Casino property in Inglewood. As an infill redevelopment, the Proposed

<sup>8</sup> The site currently includes dormitory-type sleeping quarters for some of the casual laborers who take care of the horses stabled in the barns at Hollywood Park; however, these dormitory-type sleeping quarters are not considered dwelling units. For a more detailed discussion, see Section IV. H. Population, Housing & Employment.

**Table IV.I-1  
Comparison of Project Characteristics to RCPG Policies\***

	Project would reduce costs by using and improving existing utility infrastructure. The Proposed Project would build upon existing infrastructure facilities and would be consistent with this RCPG policy.
SCAG shall support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.	The Proposed Project would minimize the need for new infrastructure and public service delivery through its location within an urbanized area already served by utility, public service, and transportation systems.
<b><i>Policies to Maintain the Regional Quality of Life:</i></b>	
SCAG shall encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled and create opportunities for residents to walk and bike.	The Proposed Project is a mixed-use community that will reduce the number of auto trips and vehicle miles traveled by placing housing opportunities in close proximity to transit and jobs. The Project will also create open space, retail, entertainment, casino/gaming and civic opportunities for residents to walk and bike. The Conceptual Circulation Plan also includes bike paths.
SCAG shall encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.	The Proposed Project would redevelop the existing 238-acre Hollywood Park Turf Club and Casino property in Inglewood. As such, it is an infill redevelopment project and would thus be consistent with this policy. The Project Site is located near well served public transit routes, including bus lines along Century Boulevard, Prairie Avenue and Crenshaw Boulevard, in addition to Metro Green Line stations at the Hawthorne Station and Crenshaw Station.
SCAG shall support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems and activity centers.	The Proposed Project proposes a Specific Plan for a mixed-use commercial and residential development in an area currently served by mass transportation services and facilities. Therefore, the Project would increase the development density at a strategic point for public transportation and would be consistent with this policy.
SCAG shall support local jurisdictions' strategies to establish mixed-use clusters and other transit-oriented developments around transit stations and along transit corridors.	The Proposed Project is a mixed-use development project that integrates commercial, residential, civic and recreational open space areas. The proposed development is bounded by Prairie Ave and Century Blvd., which are both adequately served by mass transportation services, including buses and light rail service.
SCAG shall encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.	The Proposed Project would redevelop the existing 238-acre Hollywood Park Turf Club and Casino property in Inglewood. As such, it is an infill redevelopment project and would thus be consistent with this policy.
SCAG shall support and encourage settlement patterns which contain a range of urban densities.	The Proposed Project is a mixed-use development project that would provide a range of commercial and residential land uses at varying densities to provide a range of ownership housing opportunities.
SCAG shall encourage planned development in locations least likely to cause environmental impact.	The redevelopment of the existing Hollywood Park Turf Club and Casino property would reduce environmental impacts as the property is currently developed and supported by existing infrastructure and transportation facilities.
Vital resources such as wetlands, groundwater recharge	The Project Site does not contain any vital resources

**Table IV.I-1  
Comparison of Project Characteristics to RCPG Policies\***

<p>areas, woodlands, production lands and land containing unique and endangered plants and animals should be protected.</p>	<p>such as wetlands, groundwater recharge areas, woodlands, production lands or land containing unique and endangered plants and animals that should be protected. The redevelopment of the existing Hollywood Park Turf Club and Casino property would result in the removal of the existing artificial lakes that are located within the infield of the existing racetrack. The existing artificial lakes are lined and do not constitute a wetland or contribute to groundwater recharge. The Proposed Project includes a replacement water feature within the center of the site which would serve as an aesthetic resource, serve as a water retention and filtration system, and provide habitat for birds.</p>
<p>Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.</p>	<p>The Project Site has been developed and disturbed in the past and is not known to contain any cultural or archeological resources. Although the structures on the Project Site are not significant historic resources, the Project includes design features to incorporate elements of the racetrack that have special historic character into the Proposed Project. See the Project Design Features under Section IV. E. Cultural Resources.</p>
<p>SCAG shall discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood or seismic hazards.</p>	<p>The Proposed Project is located within the Newport-Inglewood Fault Zone. Portions of the Potrero Fault traverse the eastern portion of the Project Site from north to south. The Proposed Project includes an open space restricted use area in this location and no habitable structures would be developed in this seismic set back zone. For a detailed discussion of geotechnical hazards and mitigation measures see Section IV.C, Geology/Soils.</p>
<p>SCAG shall encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage and to develop emergency response and recovery plans.</p>	<p>The Proposed Project has been designed in a manner that reduces or avoids the various environmental constraints that exist within the project area. For a detailed discussion of noise impacts and mitigation measures see Section IV.F, Noise. For a detailed discussion of geotechnical hazards and mitigation measures see Section IV.C, Geology/Soils. As the Project Site is currently developed, no biological resources would be impacted.</p>
<p><b><i>Policies to Provide Social, Political, and Cultural Equity:</i></b></p>	
<p>SCAG shall encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.</p>	<p>The Proposed Project would support implementation of this policy by including 2,995 new residential units (see Section IV.G, Population, Housing &amp; Employment). For a detailed discussion of contributions to affordable housing through tax increment financing and the 20% set-aside see Section IV.G, Population, Housing &amp; Employment.</p>
<p>Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement and fire protection.</p>	<p>The Proposed Project would include development features that would promote sustainability and mitigation measures that would promote energy and water conservation (see Section IV.J, Public Utilities). The Proposed Project would also not significantly impact public services (see Section IV.J, Public</p>

**Table IV.I-1  
Comparison of Project Characteristics to RCPG Policies\***

	<p>Utilities). Also, as part of the Project’s Plot Plan Review process under the Hollywood Park Specific Plan, each builder would incorporate energy efficiency measures and other conservation measures from the Hollywood Park Sustainability Strategy Checklist contained in the Specific Plan. The creation of this mixed-use community would not inhibit the ability of the City of Inglewood to provide such services equitably to all of its citizens. The Project also includes a 4-acre site which is proposed to be made available to a public entity for civic uses. The Project also includes an on-site police substation in the mixed-use area of the Project Site. Therefore, the Proposed Project would be consistent with this policy.</p>
<p><i>* This table lists only those policies contained in SCAG’s RCPG that are applicable to the Proposed Project. Source: Christopher A. Joseph &amp; Associates.</i></p>	

*SCAG’s Growth Visioning Goals*

The Proposed Project would be consistent with SCAG’s Growth Visioning goals as the Proposed Project would foster improved mobility by providing a mixed-use community with increased jobs and housing opportunities. The Proposed Project would provide up to 2,995 new residential units and up to 620,000 square feet (sf) of retail space, 75,000 sf of office/commercial space, a 300-room hotel and a renovated Casino/gambling facility. By incorporating a balance of new employment, residential and retail/entertainment uses within the same development, the project will promote mobility (walkability) and livability. Further, the compact nature of the design of the Proposed Project combined with the provision of pedestrian walkways, paseos and sidewalks throughout the development also promotes the walkability of the development. In addition, the project study area is currently well served by several transit services provided by the Los Angeles County Metropolitan Transportation Authority (MTA) and is surrounded by major transit corridors. As discussed in Section IV.L, Traffic/Transportation, the MTA operates ten transit routes along these four major roadways surrounding the Project Site. Additionally, the two closest Metro Green Line Stations to the Project Site include the Hawthorne Station, which is located approximately one mile to the southwest, and the Crenshaw Station, which is located approximately one and a half miles to the southeast. As discussed in Section IV.J, Public Utilities, the Proposed Project is seeking to maximize environmental sustainability by incorporating energy efficient fixtures and water conservation measures into the project. As a result, the Proposed Project would maximize environmental sustainability and would thus be consistent with SCAG’s Growth Visioning goals.

*South Coast Air Quality Management District*

As discussed in further detail in Section IV.B, Air Quality, the Proposed Project would result in a significant and unavoidable impact as it would result in a technical inconsistency with the growth projections used to establish the AQMP.



*Regional Water Quality Control Board*

The Proposed Project includes a number of Project Design Features (PDFs) intended to reduce or avoid water quality and hydrologic impacts. These PDFs include site design, source control, and treatment control Best Management Practices (BMPs) that will be incorporated into the Proposed Project and are thereby considered a part of the Proposed Project for purposes of impact analysis. Site design and source control BMPs help to manage the quantity and quality of both wet and dry weather runoff by limiting the frequency of occurrences and decreasing pollutant concentration. Treatment control BMPs are designed to remove pollutants once they have been mobilized by rainfall and runoff. The Proposed Project includes the following site design, source control, and treatment control PDFs:

- Stormwater runoff from all urban areas within the Project Site will be routed to structural treatment BMPs;
- Arroyo Park will be a linear, landscaped PDF located within the median right-of-way of the Arroyo;
- The approximately 9-acre Lake Park includes an upper and lower lake and will be landscaped with native and ornamental vegetation around the majority of its perimeter;
- Vegetated BMPs include an array of BMP types that utilize several natural treatment processes such as vegetative filtration and uptake, infiltration, adsorption, and microbially-mediated transformations;
- Catch basin inserts with stormwater screening and filtration devices will be placed directly in conventional catch basins;
- Volume-based treatment control BMPs for the Proposed Project will be sized to capture and treat at least 80 percent of the annual runoff volume from the tributary drainage area;
- Flow-based BMPs for the Proposed Project will be sized using a rainfall intensity of 0.2 inches per hour, which will result in treatment of the same portion of runoff (ie: at least 80%) as using volumetric standards described above;
- The Proposed Project will include source control measures such as education programs for owners, occupants, and employees in the proper application, storage, and disposal of pesticides that will be used at the Project Site; and
- Source controls such as street sweeping, public education, fines for littering, and storm drain stenciling can be effective in reducing the amount of trash and debris that is available for mobilization during wet and dry weather events;

- In order to minimize the potential generation and transport of dissolved constituents, native or drought-tolerant vegetation that requires little watering and chemical application will be planted in 50 percent or more of the public landscaped areas.

As discussed in greater detail in Section IV.F, Hydrology/Water Quality, the applicant will be required to obtain a National Pollution Discharge Elimination System (NPDES) and statewide General Construction Activity Permit from the RWQCB prior to construction. In accordance with the RWQCB requirements, the Project Applicant would need to file a Notice of Intent and prepare a Storm Water Pollution Prevention Plan (SWPPP) prior to any construction activity. As part of the SWPPP, the Proposed Project would be required to implement effective best management practices (BMPs) to minimize water pollution to the maximum extent practical. In addition, the final drainage plans would be required to provide structural or treatment control BMPs to mitigate (infiltrate or treat) storm water runoff. Implementation of the BMPs in the project SWPPP and compliance with the City's surface water discharge requirements would ensure that the project construction would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. As such, the project would be consistent with the applicable water quality policies of the RWQCB and impacts upon water quality would be less than significant.

#### *Congestion Management Plan*

The Proposed Project's Traffic Impact Analysis, which is presented in greater detail in Section IV.L (Traffic/Transportation) of this Draft EIR and as Technical Appendix G-1, was prepared in accordance with the County of Los Angeles CMP and City of Inglewood Department of Public Works Guidelines. As discussed in Section IV.L, the Proposed Project is expected to significantly impact one CMP intersection: CMP station 24 at Crenshaw Boulevard and Manchester Boulevard (also Study intersection No. 45). Funding the installation of an ITS traffic signal program has been proposed as an effective mitigation measure to reduce this impact to less than significant levels. With respect to CMP freeway monitoring locations, the Proposed Project would not exceed the CMP Traffic Impact Analysis Guidelines of adding 150 or more weekday morning or afternoon peak hour trips at any of the three CMP freeway monitoring locations identified within the study area. With respect to transit trips, the Traffic Impact Analysis concluded that the Proposed Project would result in a less than significant impact upon existing transit routes serving the project area. Therefore, the Proposed Project would be consistent with the CMP.

#### *Los Angeles County Airport Land Use Plan*

As discussed above, the southernmost portions of the Proposed Project Site fronting Century Boulevard are located within the boundaries of the Airport Influence Area for LAX. As such, the proposed Specific Plan has been developed in a manner that is consistent with the land use compatibility standards of the Airport Land Use Plan. Likewise, the area of the project that falls within the airport area of influence will be presented to the Airport Land Use Commission for a consistency determination. The residential and commercial land uses would be constructed in a manner that ensures adequate noise attenuation from

aircraft noise. A detailed analysis of the Proposed Project's consistency with the policies and objectives of the Los Angeles County LAX Airport Land Use Plan is presented below in Table IV.I-2.

**Table IV.I-2  
Consistency Analysis of the Los Angeles County LAX Airport Land Use Plan**

<b>General Policies</b>	
G-1 Require new uses to adhere to the Land Use Compatibility Chart.	The Proposed Project has been designed in a manner that is consistent with the Airport Land Use Plan Land Use Compatibility Chart. All residences, including any proposed residential uses that fall within the Airport Influence Area's 65 dBA CNEL contour, would be developed in a manner that achieves a 45 dBA interior noise level.
G-2 Encourage the recycling of incompatible land uses to uses which are compatible with the airport, pursuant to the Land Use Compatibility Table.	The Proposed Project has been designed in a manner that is consistent with the Airport Land Use Plan Land Use Compatibility Chart. All residences, including any proposed residential uses that fall within the Airport Influence Area's 65 dBA CNEL contour, would be developed in a manner that achieves a 45 dBA interior noise level.
G-3 Consider requiring dedication of an aviation easement to the jurisdiction owning the airport as a condition of approval on any project within the designated planning boundaries.	Portions of the Proposed Project Site are located within the designated airport influence area for LAX. However, the Project Site does not include any existing or proposed aviation easements. As such, this policy is not applicable to the proposed development.
G-4 Prohibit any uses which will negatively affect safe air navigation.	Portions of the Proposed Project Site are located within the designated airport influence area for LAX. The Proposed Project would be developed in accordance with the development guidelines of the applicable Airport Land Use Plan and would not negatively impact safe air navigation. Therefore, the Proposed Project would be consistent with this policy.
G-5 Airport proprietors should achieve airport/community land use compatibility by adhering to the guidelines of the California Noise Standards.	The Proposed Project does not include any aviation related uses and, as such, is not subject to this policy.
<b>Policies Related to Noise:</b>	
N-1 Use the Community Noise Equivalent Level (CNEL) method for measuring noise impacts near airports in determining suitability for various types of land uses.	As stated above, all residences, including any proposed residential uses that fall within the Airport Influence Area's 65 dBA CNEL contour would be developed in a manner that achieves a 45 dBA interior noise level.
N-2 Require sound insulation to insure a maximum interior 45 db CNEL in new residential, educational, and health-related uses in areas subject to exterior noise levels of 65 CNEL or greater.	New residential or educational land uses on the Project Site, including relevant portions of the Proposed Project that fall within the 65 db CNEL, would be designed and developed to achieve an interior 45 db CNEL.
N-3 Utilize the Table Listing Land Use Compatibility for Airport Noise Environments in evaluating projects within the planning boundaries.	Portions of the Proposed Project are located within the 65 dBA CNEL Noise contour of the LAX Airport Land Use Plan. Relevant land uses of the proposed development would include building insulation standards or other sound attenuation or design methods to ensure adequate interior noise environments. As such, the project would be consistent with the Land Use Compatibility Guidelines for airport noise environments.

N-4 Encourage local agencies to adopt procedures to ensure that prospective property owners in aircraft noise exposure areas above a current or anticipated 60 db CNEL are informed of these noise levels and of any land use restrictions associated with high noise exposure.	Consistent with this policy and the requirements of AB 2776, proper airport noise and hazard disclosure forms will be provided to new potential residential property owners prior to the close of escrow.
<b>Policies Related to Safety</b>	
S-1 Establish "runway protection zones" contiguous to the ends of each runway. These runway protection zones shall be identical to the FAA's runway protection zone (formally called clear zones).	The Proposed Project is not within a runway protection zone. Thus this policy is not applicable to the Proposed Project.
S-2 Prohibit above ground storage of more than 100 gallons of flammable liquids or toxic materials on any one net acre in a designated runway protection zone. It is recommended that these materials be stored underground.	The Proposed Project is not within a runway protection zone. Thus this policy is not applicable to the Proposed Project.
S-3 Prohibit, within a runway protection zone, any use which would direct a steady light or flashing light of red, white, green or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following take-off or toward an aircraft engaged in a final approach toward landing at an airport.	The Proposed Project is not within a runway protection zone. Thus this policy is not applicable to the Proposed Project.
S-4 Prohibit, within a designated runway protection zone, the erection of growth of objects which rise above an approach surface unless supported by evidence that it does not create a safety hazard and is approved by the FAA.	The Proposed Project is not within a runway protection zone. Thus this policy is not applicable to the Proposed Project.
S-5 Prohibit uses which would attract large concentrations of birds, emit smoke, or which may otherwise affect safe air navigation.	The Proposed Project does not propose any uses which would attract large concentrations of birds, emit smoke, or which may otherwise affect safe air navigation. The proposed lakes, which could attract migratory and aquatic birds, would replace the existing lakes that currently exist in the center of the racetrack. As such, the Project will not attract any more birds than currently exist in the area.
S-6 Prohibit uses which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.	The Proposed Project includes the development of a mixed-use residential/commercial community and does not propose any land uses or structures that would generate electrical interference with aircraft instrumentation.
S-7 Comply with the height restriction standards and procedures set forth in FAR Part 77.	The height restriction standards and procedures outlined in FAR part 77 restrict structures or objects that exceed 200 feet in height above grade to be erected within a CLUP. Most of the structures proposed would be below 75 feet in height. The hotel building would be approximately 150 feet in height. As such, the Proposed Project would be consistent with this policy.
<i>Source: Planning Policies and Programs of the Los Angeles County Airport Land Use Plan (1991). Consistency analysis provided by Christopher A. Joseph &amp; Associates.</i>	

*City of Inglewood General Plan*

The Proposed Project would not be consistent with the current General Plan land use designation of the Project Site. As such, a General Plan Amendment permitting mixed-use development would be required to bring the project in conformance with the General Plan. The Hollywood Park Redevelopment Project would involve a Specific Plan to facilitate the planned development of a mixed-use master planned community. With adoption of the proposed General Plan Amendment, land use impacts would be less than significant.

*Specific Plan*

The Hollywood Park Redevelopment Project would involve adoption of the Hollywood Park Specific Plan (the “Specific Plan”) to facilitate the planned development of a mixed-use master planned community. The Specific Plan creates a comprehensive set of regulations to allow for the creation of a mixed-use development of the scale of the Proposed Project. The Specific Plan provides a land use framework to redevelop the Project Site. The Specific Plan: (i) determines the appropriate location and intensity of development, mix of land uses and building heights, (ii) guides the character of the land planning to ensure high-quality, place-making improvements are made to the Project Site, (iii) establishes public and private sector implementation measures and responsibilities that adequately address local and regional impacts, and (iv) defines the future locations and dimensions of streets, rights-of-way and other access ways. The Specific Plan will be implemented through the Plot Plan Review process established in the Specific Plan.

The Specific Plan also implements cutting-edge sustainability features at the community-level of the development, and at the individual building level through the Plot Plan review process. Individual builders would incorporate energy efficiency measures and other conservation measures from the Hollywood Park Sustainability Strategy Checklist contained in the Specific Plan. See PDF B-1 in Section IV.B, Air Quality.

With adoption of the Specific Plan, land use impacts will be less than significant.

*Merged Redevelopment Project Area*

The Merged Redevelopment Project’s basic objectives are to eradicate the blighting influences within the Merged Redevelopment Project Area, redevelop incompatible land uses and revitalize existing development to obtain and be consistent with the environmental, social, and economic goals of the community. The Proposed Project would be generally consistent with the goals and intent of the Merged Redevelopment Plan as the Proposed Project would redevelop an existing property that is currently underutilized. As discussed in further detail in Section IV.H, Population, Housing & Employment, horseracing in California is a declining business industry largely due to increased competition for the public’s recreation and entertainment dollars. The increases in Indian gaming in California and the increases in purses in other states have called into question the long-term economic viability of horse racing in California. As such, the redevelopment of the Project Site would promote the Merged

Redevelopment Plan's goal to revitalize existing development in a manner that is consistent with the environmental, social and economic goals of the City.

The portions of the Project Site that fall within the Manchester-Prairie and Century Constituent Redevelopment Project Areas are designated for Commercial/Recreational and Commercial/Residential land uses. As required by the Merged Redevelopment Plan, the areas designated for Commercial Recreation shall be developed and used for recreation and entertainment facilities with such supplementary uses as hotels, motels of 200 rooms per structure, restaurants, office buildings, or accessory commercial uses as approved by the Agency. The Commercial/Residential land use category allows for mixed commercial and residential. The Proposed Project, considered as a whole, would not be consistent with the Merged Redevelopment Plan as it proposes a mixed-use planned community with residential, retail, commercial, casino/gaming, civic, and open space land uses. Although the hotel and casino/gaming uses contemplated would be consistent with the Commercial/Recreational designation, and some commercial and residential uses may be consistent with the Commercial/Residential designation, the majority of the Site is designated Commercial/Recreational while the designation of Commercial/Recreational is only applicable to a small portion of the western side of the Project Site that is currently developed with parking lots. (See Figure II-4, Preliminary Land Use Plan in Section II, Project Description). The Project would require an amendment to the Merged Redevelopment Plan. With the approval of the proposed amendments, the project would be brought into conformance with the Merged Redevelopment Plan, and land use consistency impacts would be less than significant.

For a discussion of Community Redevelopment Law and the Proposed Project's contributions to affordable housing requirements, see Section IV.H, Population, Housing & Employment.

#### *Inglewood Municipal Code/Zoning*

The Casino would be renovated and reconfigured in its existing location on the Project Site. This Site would retain the existing zoning of the site that allows casino operations (i.e., the portion of the site will remain zoned C-R). The remainder of the Proposed Project would not be consistent with the current zoning designations of the Inglewood Municipal Code. As such, a Zone Change and the adoption of a Specific Plan would be required to bring the remaining portions of the Proposed Project into conformance with the Inglewood Municipal Code. The Zone Change would also bring the proposed project into conformance with the General Plan Amendment and the Merged Redevelopment Plan Amendment, as discussed above. The remodeled and reconfigured Casino will not be closer than 200 feet to any single family residential zone; however, multi-family residential uses will be located within 200 feet. With adoption of the proposed Zone Change, land use impacts would be less than significant.

#### *Urban Decay/Blight*

Based on an economic evaluation of the Proposed Project's economic and fiscal impacts conducted by HR&A Advisors Inc., (HR&A), there is no foreseeable possibility that development of the Proposed Project would divert significant amounts of sales from existing or other planned retail developments. Therefore, the Proposed Project will not lead to the chain reaction of events that could lead to "urban

decay” (i.e., disinvestment, store closures, abandonment and resulting blight). As discussed in further detail below, potential impacts associated with the Project’s potential to result in urban decay or blight as a result of economic competition would be considered less than significant.

### *The Competitive Retail Environment*

According to the Market Study, the trade area’s existing retail inventory is dominated by supermarket-anchored (or convenience-oriented) strip centers and large format retailers along major freeways and arterial routes (e.g., San Diego Freeway, Century Boulevard, Slauson Avenue, and Hawthorne Boulevard), which maximize accessibility and visibility for vehicle traffic. The City of Inglewood’s retail inventory is concentrated near the downtown core (La Brea Ave. and Manchester Boulevard), the Century Boulevard corridor where the largest retail centers (e.g., Hollywood Park Marketplace, Village at Century, Century Plaza) are located, as well as some of the more affluent neighborhoods of the area, and towards the south.

The retail focus surrounding the site is mainly single-purpose with value-oriented retailer representation, as well as food and beverage in the form of a few fast-food and casual dining venues. Street-front retail, such as on Market Street, Inglewood Ave. and Arbor Vitae, consists primarily of local “mom & pop” shops of small to mid-sized scale. Although the Forum holds large-scale concerts, there is no cinema or intimate performance venue close to the Project site. Westfield’s Fox Hills Mall has strong local retailer representation, but most area-wide retail centers are dominated by a repetition of several department stores, supermarkets and national branded stores.

In sum, Inglewood’s retail marketplace is experiencing some growth in large format and value-oriented retail stores. But it is also experiencing a transition towards more aspirational goods and services, due to shifting demographics and new market rate residential developments. This growth and evolution in retailing responds to the City’s increasingly strong demographics and spending power. On the other hand, lagging competitiveness with surrounding areas has resulted in a significant outflow of retail spending. Despite recent introductions of national chains to the area, the Market Study found that retail selection and brand name representation in Inglewood is limited. This limited range of retailers may not create strong appeal for local residents or regional visitors to perceive Inglewood as a shopping destination.

### *Trade Area Demographics and Growth in Purchasing Power*

The Market Study also documents the current and projected future demographic and expenditure characteristics of two trade areas around the Project site. A Primary Trade Area (PTA), from which most business at the Project’s retail and related commercial uses is likely to originate, is bounded roughly by West Florence Avenue on the north, West El Segundo Boulevard on the south, the San Diego (405) freeway on the west and the Harbor (110) freeway on the east. The PTA was also divided into two parts (PTA West and PTA East) along South Western Avenue) to enable further analysis of submarket differences. A Secondary Trade Area (STA), which would be the source of remaining market demand, is

bounded by Exposition Boulevard on the north to Redondo Beach Boulevard on the south, and from about South Sepulveda Boulevard on the west to somewhat east of South Alameda Street.

The total population of the combined trade area is currently 918,226 residents, and its population is projected to increase at an average annual growth rate of 1.27% to over 1.04 million people in 2015, for an increase of over 123,000 new residents. Population growth is expected to vary significantly across the Trade Area. PTA West, within which Hollywood Park is located, has a current population of 164,690 and is expected to grow at a stable 0.96% annually. By 2015 there are expected to be slightly more than 181,113 people living in this key submarket. This projection does not incorporate the substantial residential development on the Hollywood Park development itself, which was analyzed separately. The STA's projected annual percentage population growth rate is growing slightly more rapidly than the PTA, averaging 1.33% between 2005 and 2015. This will result in expected population of 760,511 by 2015.

Average household income in PTA West (\$47,066) and PTA East (\$34,279) is 73 percent and 53 percent of the national averages, respectively. Total household income in the Trade Area is currently \$11.9 billion, with \$3.2 billion in the PTA alone. Total Trade Area household income is forecast to grow at an average rate of 2.46% per annum over the next five years, driven by growth in population and increases in per capita income. The \$11.9 billion household income total is expected to grow to \$13.4 billion by 2015, with a commensurate increase in retail expenditures.

The Market Study also found that PTA residents have per capita expenditures of \$5,805 on retail and leisure, which is 61 percent of the national average. The STA exhibits a higher spending profile than the PTA, with per capita spending of \$6,394 or 67 percent of the national average. The STA includes a broad variety of consumer markets, with lower spending in its eastern areas, and higher spending closer to the West Side of Los Angeles. Specifically, while PTA residents spend 78 percent the national average on Groceries and 81 percent on Personal Care, they spend only 67 percent of the national average on Apparel, 43 percent on Home Furnishings and 44 percent on Home Improvement. The PTA represents a \$1.54 billion dollar retail and leisure market in 2008. This is projected to grow to \$2.39 billion in 2018, or a 3.7 percent annual increase between 2008 and 2018. The STA will represent a \$4.54 billion dollar retail and leisure market in 2008. This is projected to increase to \$6.65 billion in 2015, or a 3.9 percent annual increase between 2008 and 2018. The total Trade Area is expected to grow from a \$6.2 billion dollar retail and leisure market in 2008 to over \$9.0 Billion in 2018, or a 3.9 percent average annual increase. By 2008, the five largest categories of retail spending in the Trade Area will include Groceries (\$1.6 billion), Restaurants and Cafés (\$1.1 billion), Apparel (\$679 million), Home Furnishings and Accessories (\$415 million), and Pharmacy (\$333 million).

#### *Project's Retail and Related Commercial Positioning and Market Differentiation*

Taking all of the above information into account, the Market Study found a number of market voids in the surrounding market area, and hence, opportunities for a new retail and leisure development at the Project site that could be clearly differentiated from existing retail development. More specifically, the Project will respond to an opportunity to create a hybrid retail and leisure development in a mixed-use setting, which consists of various retail formats, types and sizes, and price points to appeal to a broader range of



customers than is available in the market currently. It will be distinguished from its competitors by emphasizing “lifestyle” amenities commonly found in newer retail centers. These would include a pedestrian-friendly environment, a public gathering place such as a Town Square, quality design and landscaping, and other place-making features. It will also focus on families, particularly those with younger children, due to a lack of family-oriented retail in the competitive marketplace, and the trade area’s cultural diversity. This may include, for example, a broad range of family-oriented retailing, food and beverage and entertainment in a venue that provides for authentic “experiences” that cannot be found within competing projects in the area.

#### *Project’s Share of Supportable Floor Area*

Although a specific leasing program will be subject to market conditions at the time space is available to be leased, the current program anticipates allocating about 18 percent of the maximum 620,000 square feet GLA to convenience goods (e.g., groceries, drugs and specialty foods), 62 percent to comparison retail (e.g., general merchandise, apparel, home furnishings and specialty retail) and 20 percent to entertainment uses (e.g., cinema and eating and drinking places).

Based on the projected growth in retail and related household expenditures, population and incomes to 2012, the year that the retail uses are scheduled to be open, the PTA will support an increase of about 669,000 square feet GLA of retail and related commercial space, the STA will support about 1.7 million more square feet GLA of additional space, and the combined market area will support about 2.4 million square feet GLA of additional space, according to the Market Study. By 2018, when all of the Project’s uses are open, the PTA will support an increase of about 1.7 million square feet GLA of retail and related commercial space, the STA will support another 4.4 million square feet GLA of space, and the entire market area will support about 6.0 million square feet. Thus, the Project’s 620,000 square feet GLA are within the amounts of floor area that can be supported by growth in demand within each trade area in both time periods.

#### *Conclusion About the Potential for “Urban Decay”*

As discussed above, the general market orientation for the Project’s retail and related commercial uses as a hybrid retail and leisure development in a mixed-use setting that caters to families and targets the trade area’s cultural diversity is specifically designed to distinguish itself from existing retail offerings, including the kind of “mom & pop” retail that characterizes Inglewood’s existing street front retail concentrations. Therefore, the Project is unlikely to compete directly with existing retail located in Inglewood, and will not cause significant reductions in sales at existing street retail concentrations or retail centers.

More specifically, the maximum of 620,000 square feet GLA of floor area planned for the Project is well within the scale of floor area that can be supported by future growth in demand by 2012 and 2018, within both Primary Market Area, Secondary Market Area and total Market Area, leaving supportable floor area and demand to be captured by existing and other new retail developments. As a result, there is no foreseeable possibility that development of the Project would seize significant amounts of sales from

existing or other planned retail developments, and therefore it will not lead to the chain reaction of events that could lead to “urban decay” (i.e., disinvestment, store closures, abandonment and resulting blight).

### Land Use Equivalency Program Impacts

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

The exchange of office/commercial, retail, hotel and/or residential uses would be accomplished within the same building parameters. This exchange in the use of buildings would occur at relatively limited locations within the Project Site. There would be no substantial variation in the Project’s street configurations or relationship to the surrounding community. The development would be subject to the same design criteria (e.g. building height limits, setbacks, etc.) as the Proposed Project.

The exchange of the land uses would constitute a slight variation in the overall use mix of the Proposed Project. Table II-1 in Section II, Project Description, shows the change in land use under the Equivalency Program. A summary of the proposed land use alterations under the Equivalency scenarios is presented below in Table IV.I-3.

**Table IV.I-3  
Equivalency Program Land Use Change**

Equivalency Program Land Use Change				
Development Scenario	Residential Land Use	Retail Land Use	Office/Commercial Land Use	Hotel Land Use
<b>Proposed Project*</b>	2,995 Units	620,000 sf	75,000 sf	300 Rooms
Equivalency Scenarios				
<b>Maximum Housing 1</b>				
% Change in Land Use	17%	-7%	-33%	-17%
<b>Maximum Housing 2</b>				
% Change in Land Use	17%	-5%	-33%	-33%
<b>Maximum Housing 3</b>				
% Change in Land Use	17%	-7%	-7%	-33%
<b>Maximum Retail</b>				
% Change in Land Use	0%	8%	-33%	-33%
<b>Maximum Office/Commercial</b>				
% Change in Land Use	0%	-7%	135%	-33%
<b>Maximum Hotel</b>				
% Change in Land Use	0%	-7%	-33%	67%
<i>Note: Only includes land uses from the Proposed Project that correspond to the land uses that can be converted under the Equivalency Program.</i>				
<i>Source: Hollywood Park Land Company, 2008.</i>				

These variations would not substantially alter the overall mixed-use character of the Project. They would allow flexibility in the land use mix to address market conditions and the future needs of those who live

and work at the Project Site. To the extent the Equivalency Program is utilized to maximize the number of dwelling units on the Project Site (i.e. under Maximum Housing Scenarios 1, 2 and 3), the resulting impacts are similar to those discussed in Alternative 3,500 in Section VI. E., where the development of 3,500 units with a slight decrease in the amount of office/commercial space with the same mix of other land uses under the Proposed Project is analyzed. Therefore, the uses that could occur under the Equivalency Program, as is the case with the Proposed Project, would be compatible with the existing plans and the planned densities, and impacts regarding the regulatory framework would be less than significant.

Development under the Equivalency Program would occupy the same development areas as the Proposed Project and the overall character of development would be essentially the same as with the Proposed Project. Therefore, the relationship to surrounding neighborhoods and communities would be the same under the Equivalency Program as with the Proposed Project, and would not divide the surrounding neighborhood, community or land use. As with the case of the Proposed Project, impacts regarding the relationship to the surrounding community under all Equivalency Scenarios would be less than significant.

## **CUMULATIVE IMPACTS**

Cumulative land use impacts could occur if other related projects in the vicinity of the Project Site would result in land use incompatibility effects in conjunction with the impacts of the Proposed Project, including the proposed Equivalency Program. The Proposed Project, including the proposed Equivalency Program, would implement important local and regional goals and policies for the project area, which would assist the City of Inglewood in achieving short- and long-term planning goals and objectives. Based on a review of the related projects list provided in Section III, Related Projects, the Proposed Project, including the Equivalency Program, would be consistent with the planned uses identified in the vicinity of the Project Site. The geographic scope of the cumulative land use analysis is primarily limited to the related projects that border the Project Site or are otherwise located within an area that could be adversely affected by the proposed development from a land use compatibility perspective. The Forum property and the Wal-Mart property, both located immediately north of the Proposed Project, are proposed to be eventually re-developed with some level of commercial land uses. The design features of each project would be evaluated on a case-by-case basis to determine consistency with the General Plan and Zoning Code, and compatibility with surrounding land uses. Furthermore, all related projects would be subject to the same development standards as the Proposed Project, specifically with respect to the Inglewood General Plan, the Merged Redevelopment Project Area, the City of Inglewood Zoning Code (Chapter 12 of the Inglewood Municipal Code), and the other regional land use plans. Therefore, no significant cumulative land use impacts are anticipated.

## **PROJECT DESIGN FEATURES**

The following PDFs are proposed to be incorporated in to the project description and were used in the environmental analysis with respect to determining land use consistency and compatibility with existing neighboring land uses.

PDF I-1. The Proposed Project shall be developed in accordance with the Development Standards and Design Guidelines of the Hollywood Park Specific Plan.

PDF I-2. The Proposed Project shall be developed in accordance with the provisions set forth under the Hollywood Park Specific Plan, including the final adopted version(s) of the Preliminary Land Use Plan and Preliminary Building Height Limit Map.

In addition to the above, the Proposed Project includes a number of PDFs intended to reduce or avoid water quality and hydrologic impacts. For a list of water quality and hydrology-related PDFs, see Section IV.F, Hydrology/Water Quality, of this EIR.

### **MITIGATION MEASURES**

The following mitigation measure is recommended to reduce the Proposed Project's impacts to adopted land use plans.

MM I-1. Proposed residential uses, including those that fall within the Airport Influence Area's 65 dBA CNEL contour, shall be developed in a manner that achieves a 45 dBA interior noise level. A qualified noise consultant shall complete an exterior to interior noise analysis during the ministerial building permit stage in conformance with the California Building Code, Title 24, Section 1207 to ensure that interior noise levels are at or below 45 dBA CNEL.

### **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

With respect to threshold question (a), the Proposed Project, including the proposed Equivalency Program would not physically divide an established community. Therefore impacts would be less than significant.

With respect to threshold question (b) the Proposed Project, including the proposed Equivalency Program, would not substantially conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project. With approval of the requested discretionary actions and adoption of the required findings, as recommended in the mitigation measure above, the Proposed Project's impacts related to land use plans, policies, and zoning would be reduced to less-than-significant levels.

With respect to the Proposed Project's and the proposed Equivalency Program's potential to result in urban decay or blight, there is no foreseeable possibility that development of the Project would seize significant amounts of sales from existing or other planned retail developments, and therefore it will not lead to the chain reaction of events that could lead to "urban decay" (i.e., disinvestment, store closures, abandonment and resulting blight).