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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**J. PUBLIC UTILITIES**  
**1. WATER**

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**INTRODUCTION**

This section addresses the potential environmental impacts associated with the provision of potable and reclaimed water to the Proposed Project. The Proposed Project is located within the City of Inglewood Water Service Area and therefore the City of Inglewood will provide water to the Hollywood Park Redevelopment Project. In accordance with California regulations, the City of Inglewood has prepared a Water Supply Assessment (WSA) to evaluate the Project's anticipated water demand compared to the City's water supplies during normal water and dry water years. The WSA is discussed in detail below, and is attached in its entirety as Appendix F-6 to this Draft EIR.

**ENVIRONMENTAL SETTING**

**Regulatory Setting**

*Urban Water Management Planning Act*

The State of California recognizes that the waters of the state are a limited and renewable resource. The State also understands that the conservation and efficient use of urban water supplies are of statewide concern, but the planning and implementation of water management programs can best be accomplished at the local level. As a result, the California Urban Water Management Planning Act (Act) was established in 1983. The Act has subsequently been amended and is included in Division 6 of the California Water Code, Part 2.6 Urban Water Management Planning, Sections 10610 through 10657.

One of the Act's primary goals is to encourage urban water suppliers to develop long range plans in an effort to ensure appropriate levels of reliability in their water service during normal, dry, and multiple dry water years. Thus, in accordance with the Act, urban water suppliers are required to develop water management plans to actively pursue the efficient use of available supplies. Specifically, the act requires that urban water suppliers providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet (AF) of water annually prepare and adopt an Urban Water Management Plan (UWMP) addressing the prescribed elements, contained in the Act.

The Act also addresses the public health issues pertaining to water contamination and implementing effective water management strategies, including groundwater storage projects and recycled water projects. The Act recognizes that water quality regulations are becoming an increasingly important factor in water agencies' selection of raw water sources, treatment alternatives and modifications to existing

treatment facilities, and that changes in drinking water quality standards may impact the usefulness of water supplies and may ultimately impact supply reliability.

In accordance with the Act, the State legislature identifies the State policy as follows:

- a.) The management of urban water demands and efficient use of water shall be actively pursued to protect both the people of the state and their water resources.
- b.) The management of urban water demands and efficient use of urban water supplies shall be a guiding criterion in public decisions.
- c.) Urban water suppliers shall be required to develop water management plans to actively pursue the efficient use of available supplies.

It is clear through ever-increasing changes to the Act and other legal actions that the UWMP is becoming a more vital plan by which urban water suppliers must rely for their present and future water planning needs and planned development.

According to the California Department of Water Resources (DWR), the UWMP is considered to be a source of information for WSAs and written verifications of water supply required by recent legislation. In addition, an UWMP may serve as a long-range planning document for water supply, a source of data for development of a regional water plan, and a source document for cities and counties as they prepare their General Plans.

### ***West Coast Basin Judgment***

The West Coast Basin Judgment (Judgment) ultimately was the result of the litigation California Water Service Company, et al. vs. City of Compton, et al. in July 1961, and a subsequent Amended Complaint involving several parties. The Superior Court of the State of California provided a decision including Findings of Fact and Conclusions of Law and Judgment, to which further amendments have been made.

The Judgment defines the boundaries of the West Basin, declares adjudicated water rights, discusses transferable rights, and addresses the issues of water rights carryover, excess production, drought carryover, exchange pools, and water basin replenishment. The Judgment also stipulates the appointment of the Watermaster to administer and enforce the provisions of the Judgment. The most recent Watermaster Service Report is for July 1, 2006 - June 30, 2007.

### ***Pertinent Legislation***

#### ***Senate Bill (SB) 610***

In 2001, the California State Legislature approved Senate Bill 610 (SB 610), which amended Sections 10910-10915 of the State Water Code to require a city or county to identify any public water system(s) that may supply water for the project and to request those public water systems to prepare a specified

water supply assessment, except as otherwise specified. The amended water Code requires the assessment to include, among other information, an identification of existing water supply entitlements, water rights, or water service contracts relevant to the identified water supply for the Proposed Project and water received in prior years pursuant to those entitlements, rights, and contracts.<sup>1</sup> Section 10912(a) of the State Water Code defines a “project” for purposes of determining whether a Water Supply Assessment would be required as:

- (1) A proposed residential development of more than 500 dwelling units.*
- (2) A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.*
- (3) A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.*
- (4) A proposed hotel or motel, or both, having more than 500 rooms.*
- (5) A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.*
- (6) A mixed-use project that includes one or more of the projects specified in this subdivision.*
- (7) A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.*

As the Proposed Project includes the development of 2,995 dwelling units and 620,000 sf of retail space, 75,000 square feet of office/commercial space, and a 300-room hotel, a Water Supply Assessment is required for the proposed development.

#### *Senate Bill (SB) 221*

SB 221 (California Government Code Section 66473) passed the legislature in 2001. This code requires that the water supplier verify in writing that a sufficient and reliable water supply will be available prior to completion for development projects consisting of more than 500 housing units, or in smaller developments if the project represents 10 percent or more of the total number of service connections if the water purveyor has fewer than 5,000 connections. Certain types of projects, including affordable housing projects may be exempt. Prior to approving a proposed subdivision, a city or county must make a finding

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<sup>1</sup> *Senate Bill 610, Legislative Counsel’s Digest, website: [http://www.groundwater.water.ca.gov/docs/sb\\_610\\_bill\\_20011009\\_chaptered.pdf](http://www.groundwater.water.ca.gov/docs/sb_610_bill_20011009_chaptered.pdf), accessed October 4, 2006.*

that there is enough water to serve the project during average, dry, and multiple dry water years without affecting existing and projected water customers. Valid water entitlements, water infrastructure financing, and all major permits and approvals must be in place to justify sufficient water supply.

### *City of Inglewood 2005 Urban Water Management Plan (UWMP)*

The first water system in the City was built by the Centinela-Inglewood Land Company in 1888 to serve the new town of Inglewood. The Inglewood municipal water utility was created in 1920. In response to the Urban Water Management Planning Act, the City of Inglewood submitted its first UWMP to the California Department of Water Resources (DWR) in 1985, and updated Plans were submitted in 1990, 1995, 2000 and 2005 as required by the Act. In 2003, the City also completed the 25-year Water Master Plan. The 2005 Plan reflects accomplishments since the last plan and identifies additional and modified programs to effect enhanced water reliability planning. The 2005 UWMP contains information on the following:

- Water Utility Information;
- Plan Preparation and Public Participation;
- Climatology;
- Comparison of Existing and Projected Water Supply Sources versus Existing and Projected Water Use;
- Assessment of the Reliability of Suppliers' Water Service to Its Customers During Normal, Dry, and Multiple Dry Water Years;
- Wastewater and Recycled Water Description Including Its Potential for Use as a Water Source in the Service Area;
- Urban Water Shortage Contingency Plan Components;
- Description of Suppliers' Water Demand Management Measures Under Current Implementation or Scheduled Implementation, Including Steps to Implement Proposed Measures; and
- Evaluation of Each Water Demand Management Measure that Is Not Currently Being Implemented or Scheduled for Implementation.

In accordance with the California Water Code, Section 10910 (c), the City is required to determine whether the projected water demand associated with a proposed project was included as part of the most recently adopted UWMP. If the projected water demand associated with the proposed project was accounted for in the most recently adopted UWMP, the City may incorporate the requested information from the UWMP in preparing the elements required in the water supply assessment.

In the City of Inglewood 2005 UWMP, estimated water demands were included for three potential development projects within the City, and were included in the analysis of normal and single dry water year's projections to 2030 and multiple dry water years to 2025. The three development projects included

in the 2005 UWMP were Haagan, Renaissance and Bay Meadows (now called Hollywood Park). As such, this water supply assessment incorporates data and analysis information from the 2005 UWMP.

As discussed in the 2005 UWMP, the City meets water demand by using groundwater supplies from its own well systems and purchasing water from outside sources.

The well water is produced from City-owned wells that pump groundwater from the West Coast Basin up to the maximum allowable extraction for each year. The City currently has 4,449.89 AF of water rights annually. Originally, through adjudication of the West Coast Basin, the City was entitled to 4,382.00 AF per year of water rights. Subsequently, the City has purchased water rights from several sources, including Frank Abell, Boise Cascade Building Co., Georgia Pacific Corp., Kaufman, Leo and Sheldon Baer, and George R. Murdock for an additional amount of 67.89 AF per year.

Generally, the maximum allowable extraction is the total amount of water rights owned by the City, plus any carryover of unused water rights from the previous year, plus any net leases or exchange of water rights per agreements. In Fiscal Year 2007, the City had 4,449.89 AF of water rights, plus a carryover of 788.94 AF of water rights, plus a net lease exchange of 282.00 AF of water rights for a total allowable extraction of 5,520.83 AF. According to the West Coast Basin Watermaster records for FY 2007, the City pumped 3,551.28 AF from groundwater supplies and purchased 7,527.10 AF of imported water.

The City has four wells (wells # 1, 2, 4, and 6) in service and producing water into the system. The City also has two connections with MWD through which it purchases imported water from WBMWD. The City also has six connections to Golden State Water Co. and two connections to the Los Angeles Department of Water and Power, which are used for emergency supplies only.

### ***Global Warming***

On June 1, 2005, Governor Arnold Schwarzenegger issued Executive Order S-3-05, and established greenhouse gas emissions targets for California and required biennial reports on potential climate change effects on several areas, including water resources. The potential effects of increasing atmospheric concentrations of carbon dioxide and other ‘greenhouse gases’ and the observed increase in the average temperature of the Earth’s atmosphere and oceans have been the subject of considerable technical analysis and political debate. The natural phenomena (e.g. temperature, rainfall) that together form the climate of a particular region vary from day-to-day and year-to-year. The variation in climate can be a result of natural, internal processes or in response to external forces from both human and non-human causes, including solar activity, volcanic emissions, and greenhouse gases.

Although experts generally agree that the earth’s atmosphere has warmed over the last century and will likely continue to warm in the future, there is substantial uncertainty as to how this warming will quantitatively affect future water supplies, and specifically, how this warming will affect SWP supplies. The California Department of Water Resources (DWR) is the state agency charged with the statutory responsibility to build, manage, and operate the SWP. DWR, as the owner and operator of the SWP and

the agency with a statewide perspective and most relevant technical expertise, is in the best position to determine the effects of global warming on SWP supplies.<sup>2</sup>

In June 2006, DWR published a Technical Memorandum Report entitled *Progress on Incorporating Climate Change into Planning and Management of California's Water Resources* in response to the Executive Order (DWR 2006a). The Report describes progress made incorporating climate change into existing water resources planning and management tools and methodologies. Some preliminary results on the potential effects of climate change are presented. While the analyses presented in the Report used the most current scientific techniques and were reviewed by experts, all of the results are preliminary. The Report incorporates several assumptions, reflects a limited number of climate change scenarios, and does not address the likelihood of each scenario. Policy implications of climate change and recommendations to respond to the future demands for water are identified as beyond the scope of the Report. The Report acknowledges that there are substantial uncertainties regarding the effects of global warming on SWP supplies and suggests additional analysis to reduce this uncertainty.

Regarding the purpose and use of the Technical Memorandum Report in the analysis of climate change, the Technical Memorandum Report states that:

“The purpose of this report is to demonstrate how various analysis tools currently used by DWR could be used to address issues related to climate change. The methods and results presented in this report could be used to guide future climate change analysis and to identify areas where more information is needed. All results presented in this report are preliminary, incorporate several assumptions, reflect a limited number of climate change scenarios, and do not address the likelihood of each scenario. Therefore, these results are not sufficient by themselves to make policy decisions.” (page II).

It is therefore premature to make an assessment of how, for example, snow melt will affect water availability. It is noted that increased use of groundwater storage is a potential strategy identified in the referenced Technical Memorandum Report (Table 2-3) to mitigate potential impacts of global warming.

The 2005 SWP Delivery Reliability Report addressed the need to incorporate some of the uncertainties of global warming with regard to planning and operation of the SWP, and stated that, “Until the impacts of climate change on precipitation and runoff patterns in California are better quantified, future weather patterns are usually assumed to be similar to those in the past, especially where there is a significant historical rainfall record.”

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2 The Los Angeles Superior Court recently issued a statement of decision (Case No. BS 084677) on August 15, 2007, which upheld the City of Santa Clarita's Return to a Writ of Mandate and Final Additional Analysis to an EIR for a local development project. The court stated that DWR has the most expertise on water supplies in California, DWR has determined that the science on global warming has not reached a point where it can be quantified and incorporated into delivery projections of the SW and CEQA does not require the City to undertake such an analysis.

DWR is actively engaged in developing a set of water management policies that will provide a comprehensive approach to climate change. The science regarding global warming is still evolving and policy recommendations on how to incorporate potential changes to water supply due to climate change are being developed. However, the importance of conservation and maintaining a reliable water supply in the context of global warming is recognized by DWR and water planners.

The Global Warming Solutions Act of 2006 (Health and Safety Code Sections 38500 *et seq.*) requires the California Air Resources Board (CARB) to adopt regulations requiring monitoring and annual reporting of greenhouse gas emissions from the most important sources or categories of sources. By January 1, 2011 CARB must establish greenhouse gas emissions limits and emission reduction measures necessary to achieve the 1990 levels by 2020.

As discussed above, it is anticipated that California agencies will more precisely quantify impacts of climate change in various regions of the State and that DWR will formalize anticipated effects of climate change on water supply. Once DWR provides this assessment, it may be used by local water agencies to determine to what extent the supplies will be affected by global climate change impacts. As DWR develops more specific assessments of the potential effects of climate change on SWP delivery reliability and water demands, local purveyors can update their plans accordingly.

### ***2005 UWMP Water Supply Analysis***

The City of Inglewood 2005 UWMP provides a water supply analysis for normal and dry water years through the year 2030 by presenting a comparison of projected water supply and demand.

In normal water years, the 2005 UWMP indicates that projected demands through 2030 can be met based upon the projected supplies, except in 2030 when the City may have to purchase approximately 1.9% of additional supplies.<sup>3</sup>

In a single dry water year, the 2005 UWMP indicates that the City would have sufficient supplies to meet demand based upon the comparison of the supply and demand for a projected single dry water year through 2030, using the assumptions in the report.<sup>4</sup>

During multiple dry water years, the 2005 UWMP indicates that the City would have sufficient supplies to meet demand based upon the comparison of the supply and demand for projected multiple dry water years through 2025.<sup>5</sup>

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<sup>3</sup> See Tables 11, 12, and 13 of Section VI of the 2005 UWMP. (The 2005 UWMP is appended to Appendix F-6 of this EIR.

<sup>4</sup> See Tables 14, 15 and 16 of Section VI of the 2005 UWMP.

<sup>5</sup> See Tables 17 through 28 of Section VI of the 2005 UWMP.

These conclusions are based upon available data at the time of preparation of the report in 2005, and based upon the assumptions outlined in the text of the 2005 UWMP, including water conservation and assuming the long-term availability of imported water supplies from West Basin Municipal Water District (WBMWD).

The 2005 UWMP clearly states that in the past, in single dry water years or multiple dry water years, the City was able to meet demand by purchasing additional water from WBMWD as needed; but in the future, the City may not be able to meet demand in single dry water years or multiple dry water years if regional agencies are unable to supply sufficient supply to all its member agencies.

The 2005 UWMP also clearly states that the City must continue to evaluate, upgrade and maximize its own groundwater supply sources and implement water treatment as needed. The City must look toward the future and secure alternate sources of supply from other cities or agencies. This requires long-term agreements with agencies to ensure that alternate supplies are available when needed in accordance with those agreements, even if it is for emergency supplies only.

#### *Water Conservation*

In addition, the City must also make every effort to educate the public in the wise use of water in order to maintain sufficient supply. The City must aggressively promote water conservation in all sectors of the community. The City must continue to upgrade its water system infrastructure, through implementation of its Capital Improvement Plan, to minimize water system loss and maximize efficiency.

The City has also demonstrated that it will not hesitate to implement voluntary conservation measures or mandatory reductions if the need arises. This is demonstrated by the adoption of ordinances, which require specific action on the part of all water users to reduce water consumption during declared water shortages.

In May 1990, the City adopted Resolution No. 90-45 encouraging water conservation practices by all water users. The resolution declared that a water shortage exists and requests and encourages all water users to reduce water use by 10%, as compared to 1989. This voluntary measure discouraged wasteful water practices, including hosing walkways and other hard surfaces, washing of vehicles without use of a hose, cleaning and filling of non-recirculating decorative fountains, watering landscape between 7:00 am and 7:00 pm, and serving water in restaurants unless requested. A copy of Resolution No. 90-45 is located in Appendix I of the 2005 UWMP.

The following year, in March 1991, the City adopted Ordinance No. 91-6 declaring a water shortage and adopting mandatory water conservation practices. The ordinance includes many of the same provisions as contained in the voluntary resolution plus additional water waste practices, and including a provision for penalties for failure to comply. Ordinance No. 91-6 is described in detail in section VIII Water Shortage Contingency Planning of the 2005 UWMP. A copy of Ordinance No. 91-6 is located in Appendix J of the 2005 UWMP.



In July 1993, the City adopted Ordinance No. 93-20 amending the municipal code to provide for water efficiency in the landscape, and further restricting the use of water in a wasteful manner. Ordinance No. 93-20 is also described in more detail in section VIII Water Shortage Contingency Planning. A copy of Ordinance No. 93-20 is located in Appendix K of the 2005 UWMP.

Notwithstanding the overall favorable conclusions in the 2005 UWMP, the plan indicates that long-term supplies of imported water supplies from WBMWD cannot ultimately be guaranteed. Accordingly, the 2005 UWMP recommends upgrading the water system infrastructure, including the addition of new wells, back-up power and system redundancy, and increasing the use of reclaimed water where applicable in order to help the City to achieve the objective of reducing imported supplies.

### *Statewide Drought*

On June 4, 2008, California's Governor issued Executive Order S-06-08, a Statewide Drought Declaration, dealing with current water shortages and voluntary water conservation measures to be adopted by water purveyors throughout the state. Executive Order S-06-08 includes a wide variety of measures to help facilitate drought response by DWR and Department of Public Health, include the following exemplary orders:

- expedite existing grant programs for local water districts and agencies for water conservation programs and projects;
- facilitate water transfers in 2008 and prepare to operate a dry year water purchasing program in 2009;
- conduct an aggressive water conservation and outreach campaign;
- convene the Climate Variability Advisory Committee to prioritize and expedite drought-related climate research;
- provide technical assistance for drought response;
- review the water shortage contingency elements of UWMPs and work cooperatively with water suppliers to implement improvements;
- prioritize processing of loans and grants for water suppliers demonstrating hardship;
- identify public water systems at risk of health and safety impacts;
- review mutual aid agreements among large water purveyors;
- identify potential federal funding for local water agencies and farmers; and
- gather data on crop losses and economic impacts; and work with local water agencies to reduce water consumption locally.

*Imported and Groundwater Supplies*Imported Supplies

The City's imported water supplies are provided through the West Basin Municipal Water District (West Basin), which in turn secures its imported water from sources including the Metropolitan Water District (MWD). A letter relating to water supply reliability issues was prepared at the City's request, dated July 7, 2008, to address the current and future actions by West Basin to further the long-term reliability of water supplies to the City. (See Appendix F-6 to this EIR). It was acknowledged in the letter, "that the City has demonstrated leadership in responsible water management, most recently with the adoption of the 'It's time to Get Serious,' resolution to raise awareness of current water supply challenges and a commitment to review water use efficiency ordinances."

The letter also notes that West Basin has developed a model water conservation ordinance, which contains the following four primary actions, which will have a positive affect on water reliability in the West Coast Basin:

- a. Phase V Expansion of the Edward C. Little Water Recycling Facility to increase high purity recycled water for injection at the West Coast Seawater Barrier from 12.5 million gallons per day (mgd) to 17.5 mgd, replacing the remaining 5 mgd of imported water used for that purpose.
- b. Additionally West Basin is in the process of the conversion of the Dominguez Gap Seawater Barrier from imported water to recycled water sources. At this writing 2 mgd has been converted by the City of Los Angeles, and it is anticipated that within 10 to 20 years all injection water (11 mgd) will be high purity recycled water; thus freeing up a considerable amount of imported water for direct domestic uses.
- c. West Basin notes that, "With the completion of the Phase V and future projects, all replenishment of the West Coast Basin, the source of the City's groundwater production, will be immune to drought and other supply challenges."
- d. West Basin notes that, full scale development of ocean-water desalination is planned by 2020 to replace up to 20 million gallons per day of imported water with a locally produced, drought-proof, potable water source. At this writing, the design of a temporary demonstration desalination facility is underway.
- e. West Basin is planning aggressive implementation of their Conservation Master Plan, which intends to double the amount of water conserved by 2020.
- f. West Basin intends to participate in planned groundwater conjunctive use programs as they may occur through the current policy framework agreed to by the West Basin stakeholders. Application of this program could allow for the increased storage of high-purity recycled water through an amendment to the West Coast Basin Judgment.

In summary West Basin notes: “Through implementation of these actions, West Basin will meet 60% of the service area needs through conservation and locally-controlled supply sources by 2020, compared to roughly one-third today.”

In its letter, West Basin also notes that the West Basin recycled water system is ready to serve the proposed Hollywood Park Development, noting their commitment to irrigate common landscape areas with recycled water. West Basin also commits to assisting Hollywood Park with ensuring that financial incentives and other assistance is offered for high-efficiency conservation devices for indoor and outdoor application in the development.

Reference is made to the State of California Department of Water Resources’ issuance of the Draft State Water Project Delivery Reliability Report, on January 22, 2008. The report indicates that the State’s water supply would be impacted by climate change as well as reductions in State Water Project (SWP) water delivered due to pumping restrictions in accordance with the December 2007 federal court order imposing interim rules to protect the delta smelt.

As further discussed below, the MWD has issued a news release to its member agencies in March 2008 indicating as much as a 30% reduction in wholesale water supplies from Northern California because of court-imposed pumping restrictions. The 2005 UWMP was prepared prior to the development of this issue and it is unclear at this time what the specific impacts of curtailed imported water supplies may be. Notwithstanding, the Hollywood Park Redevelopment Project would be responsible for providing sufficient water supplies to meet its water demand. What the 30% reduction issue does potentially dictate is the source of the required demand. It almost assuredly requires that the proposed water demand come from groundwater sources, because imported supplies cannot be relied upon.

#### ***U.S. District Court Rules that a New Biological Opinion on SWP Operations in the Delta is Needed***

The precise amount of water that MWD will be able to supply to Southern California in the near future is unclear given the recent federal court decision *Natural Resources Defense Council, et al. v. Kempthorne, et al.* (“NRDC”). In Spring 2007, various environmental groups sought to halt the operation of water pumps in the Sacramento-San Joaquin River Delta (the “Delta”) to protect the Delta smelt and other endangered fish species living in the Delta. In May 2007, a federal court invalidated the Biological Opinion issued by the U.S. Fish & Wildlife Service, which had held that the Delta smelt were in “no jeopardy” from operational changes of the SWP in the Delta. DWR and the U.S. Bureau of Reclamation are currently working with the U.S. Fish & Wildlife Service to prepare the new biological opinion. On May 31, 2007, the California Department of Water Resources (“DWR”) voluntarily shut down SWP pumps for 17 days in an effort to protect the Delta smelt. In an August 2007 oral decision, the same federal court agreed to institute interim protective measures that restrict water operations in the Delta, including reducing the amount of water being pumped out of the Delta between the end of December and June.

At this time, the full extent of the impact on MWD’s ability to supply water to Southern California is still uncertain. However, these events have highlighted the challenges that water suppliers throughout the

state currently face regarding supplies from the Delta. MWD obtains approximately 1.2 million acre feet of water from the State Water Project. With this oral decision by the federal court, this amount of water received from the State Water project is anticipated to be decreased by approximately 15 to 30 percent.

Restoring the Delta's water capacity is a high priority for MWD, the Governor and the California Legislature; extensive plans are already underway for improving the operation of the Delta's water pumps while also protecting the Delta smelt and other endangered fish species.<sup>6</sup> In June 2007, MWD's Board of Directors adopted an Action Plan to implement immediate short-term actions to stabilize the Delta and mid-term and long-term actions to find an ultimate solution to the Delta's sustainability. The Governor has made the Delta and statewide water policy a high priority by establishing the Delta Vision Process and the Bay-Delta Conservation Plan, and the California Legislature is using SB 27 to find a long-term water supply solution for the Delta. As a result of these plans, MWD's water supply may be restored to previous levels in the next few years.

In response to recent developments in the Delta, MWD is also engaged in identifying solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies. In the near-term, MWD will continue to rely on the plans and policies outlined in its Regional Urban Water Management Plan ("RUWMP") and Integrated Water Resources Plan to address water supply shortages and interruptions (including potential shut downs of SWP pumps) to meet water demands. Campaigns for voluntary conservation, curtailment of replenishment water and agricultural water delivery are some of the actions outlined in the RUWMP. If necessary, reduction in municipal and industrial water use and mandatory water allocation could be implemented. There are currently no restrictions on the City of Inglewood's ability to purchase imported water.

### *Water Rights*

A letter confirming the water rights held by both the City of Inglewood and Hollywood Park Land Company LLC was requested from the State of California, Department of Water Resources (DWR), Southern District who serves as the West Coast Basin Watermaster (Watermaster). A letter, dated July

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<sup>6</sup> *The Governor previously initiated a comprehensive Delta Vision process and, by Executive Order S-17-06, appointed a Blue Ribbon Task Force to recommend future actions that will achieve a sustainable Delta. In December of 2007, the Delta Vision Blue Ribbon Task Force submitted to the Governor its final report, "Our Vision for the California Delta," which included 12 linked recommendations and several proposed near-term actions to protect the Delta ecosystem and the state's water supply. Among the 12 Integrated and Linked Recommendations ([http://deltavision.ca.gov/BlueRibbonTaskForce/FinalVision/Vision\\_2\\_Page\\_Summary.pdf](http://deltavision.ca.gov/BlueRibbonTaskForce/FinalVision/Vision_2_Page_Summary.pdf)) is the recommendation that the goals of conservation, efficiency and sustainable use must drive California water policies. In addition, the recommendations include that a revitalized Delta ecosystem will require reduced diversions, or changes in patterns and timing of those diversions, upstream, within the Delta and exported from the Delta at critical times. The near-term actions included in the report focus on preparing for disasters in or around the Delta, including emergency flood protection, and making immediate improvements to protect the environment and the system that moves water through the Delta. The complete report is accessible at [http://deltavision.ca.gov/BlueRibbonTaskForce/FinalVision/Delta\\_Vision\\_Final.pdf](http://deltavision.ca.gov/BlueRibbonTaskForce/FinalVision/Delta_Vision_Final.pdf). A Strategic Implementation Plan is to be completed by the Blue Ribbon Task Force by October of 2008.*

21, 2008, was received from the Watermaster, which sets forth the following documentation regarding the above referenced water rights:

- a. The City of Inglewood currently has 4,449.89 acre-feet of Adjudicated Rights in the West Coast Basin annually.
- b. Hollywood Park Land Company, LLC currently has 282.00 acre-feet of Adjudicated Rights in the West Coast Basin annually.

A breakdown and detailed discussion of the origin of these Adjudicated Rights for both parties is set forth in the Watermaster's letter. (See Appendix F-6 to this EIR)

Recently in an environmental process being performed by a city in the Central Basin, the Tongva Ancestral Territorial Tribal Nation claimed to have water rights in that Basin. The Central Basin Watermaster in a letter to that city, dated April 30, 2008, indicated the following in that regard:

"Watermaster files have no records showing that the Tongva Ancestral Territorial Tribal Nation ever had or currently has water rights in the Central Basin."

#### *Groundwater Supplies*

A letter dated July 23, 2008 was sent to the City of Inglewood from The Water Replenishment District of Southern California (WRD) in regards to the replenishment, protection and preservation of groundwater supplies and quality in the West Coast Basin (See Appendix H). WRD notes in its letter that, "The West Basin is an adjudicated basin and therefore all pumpers in the Basin(which include the City of Inglewood and Hollywood Park) have the authority under the West Basin Judgment to pump their adjudicated rights."

WRD notes that the natural inflow to the West Basin comes from inflow from the Central Basin to the east and other basins as well as from surface inflow into the upper aquifers during rainfall events. The following is an excerpt from the letter explaining the current and future storage within the West Basin.

The natural safe yield is estimated to be 26,500 acre-feet / year. The managed safe yield of 64,468.25 is substantially higher than the natural safe yield. The higher yield is possible because of the artificial recharge maintained by the WRD. It has been one of the District's main responsibilities since 1959 to help make up the annual overdraft by providing artificial replenishment water to recharge the aquifers and supplement natural recharge. Artificial replenishment occurs in the West Coast Basin by fresh water being injected at two seawater intrusion barriers. Although the primary purpose of the barriers is for seawater intrusion control, groundwater replenishment also occurs as the fresh water is injected into the aquifers and then moves inland towards pumping wells.

The barriers are supplied by a blend of imported and recycled water. Over the last 10 years, the barrier water supply has shifted from imported to recycled water. The West Coast Barrier is currently a 75/25 blend of recycled/imported water, but working with the West Basin MWD, WRD plans to use 100%

recycled water once the Phase V Expansion of the Edward C. Little Water Recycling Facility is complete. Similar conversions to 100% recycled water are planned for the Dominguez Gap Barrier. With the completion of Phase V and future barrier water supply projects, all replenishment of the West Coast Basin, the source of the City's groundwater WRD is also considering the use of physical barriers in addition to injection wells to preclude seawater intrusion into the basin.

Furthermore, groundwater storage opportunities are being developed that will increase water in storage and improve supply reliability to the West Coast groundwater basin.

In summary WRD is managing the West Basin groundwater supply through its replenishment, monitoring and groundwater activities. Historically, the groundwater levels in the basin have remained fairly constant. With our shift to more recycled water for supply to the seawater intrusion barriers and the establishment of groundwater storage in the basin, groundwater supply reliability will continue to improve.

In order to be able pump its adjudicated rights, the City must continue to provide WRD with payments of its Replenishment Assessment (RA), which is contingent with the City's right to pump groundwater.

#### *Recycled Water Supply*

The WBMWD currently practices water reclamation and conservation efforts in the area, including the provision of reclaimed water infrastructure in the City of Inglewood. West Basin also purchases effluent from the City of Los Angeles operated Hyperion Treatment Plant that has received secondary treatment and treats it to a minimum of tertiary treatment in order to meet State requirements. The City has been purchasing recycled water from WBMWD Water Recycling Plan in El Segundo since 1995. The City of Inglewood has 16 connections to WBMWD's recycled water system. In FY 2007, the City purchased 797.06 AF of recycled water to supply landscaping water needs for several consumers.

#### *City of Inglewood Municipal Code*

Municipal Code Section 5-112 (Water Efficiency in the Landscape) establishes procedures and standards for the design, installation, and maintenance of water-efficient landscapes in conjunction with new construction projects within the City. The Code promotes the conservation and efficient use of water within the City in order to prevent the waste of water resources (Municipal Code Section 3.1-10.).

#### *Local Water Infrastructure*

##### *Potable Water Lines*

The Proposed Project is located within the WBMWD's Water Service Area, within the jurisdictional boundaries of District No. 5, and is adequately served by existing water mains. The City's water service area covers approximately 4,600 acres within the City's boundaries. Water is provided by the City's system to approximately 84 percent of the residences and businesses in the City. The City's water service in 2005 included a population of approximately 98,714 residents through 14,818 connections. However,

based on water pressure zoning designations, approximately 18,625 residents (approximately 16 percent of the City population) in the City receive water service from other agencies. The City's service area is divided into three distinct pressure zones because of the elevation differences that vary from 60 to 247 feet above mean sea level (msl). The Project Site is located in Zone 2.<sup>7</sup>

Water infrastructure within the City and within the project vicinity consists of 3-inch to 30-inch cement-lined water mains. Figure IV.J-1, Existing Water Infrastructure depicts the location of existing local water lines serving the Project Site and immediately surrounding area. As shown in Figure IV.J-1, the Project Site is served by an existing 8" City of Inglewood water main located beneath Prairie Avenue (with a service connection at Arbor Vitae), a 12" City of Inglewood water main located beneath Century Boulevard (with a 10" water service connection at Yukon Avenue), and a 20" main line located beneath Pincay Drive (W. 90<sup>th</sup> Street). The existing potable and recycled water infrastructure that currently exists within the immediate project vicinity is summarized in Table IV.J-1, below.

#### *Reclaimed Water Lines*

Based on available record drawings reviewed to date, the Project Site is served by an existing 36" conveyance pipe that runs along Prairie Avenue. This line serves the Project Site through an existing 4" recycled water meter/connection located at Hardy Street.

Future disinfection stations are planned to be installed, on 120<sup>th</sup> St. and/or Prairie Av. & 102<sup>nd</sup> St, by WBMWD to improve recycled water quality. This is due to extended retention times and elevated ammonia levels within the existing 36-inch main running north below Prairie Avenue as a result of insufficient usage. Current demand for recycled water is low, and is primarily only used for irrigation purposes within parks, public-street parkways, golf-courses, and private Home Owner Association maintained landscapes. Potential Inglewood customers within the project area are currently identified as being Darby Park, Briarwood and Homestretch & Renaissance along W. 90<sup>th</sup> St./Pincay.

The Project Site consists of approximately 238 acres, including a racetrack, turf course, two large infield lakes, and associated racetrack facilities. Recent historical water demand (Fiscal years 2003-2007) for the Project Site shows an average of 359.96 AF/Y (321,352 gallons per day).<sup>8</sup> (See Table IV.J-2, Estimated Potable Water Demand for Proposed Project). Hollywood Park Racetrack and Casino currently has an adjudicated water right of 282 AF/Y (251,753 gallons per day).<sup>9</sup> There are no current deficiencies in the water service system in the vicinity of the Proposed Project.<sup>10</sup>

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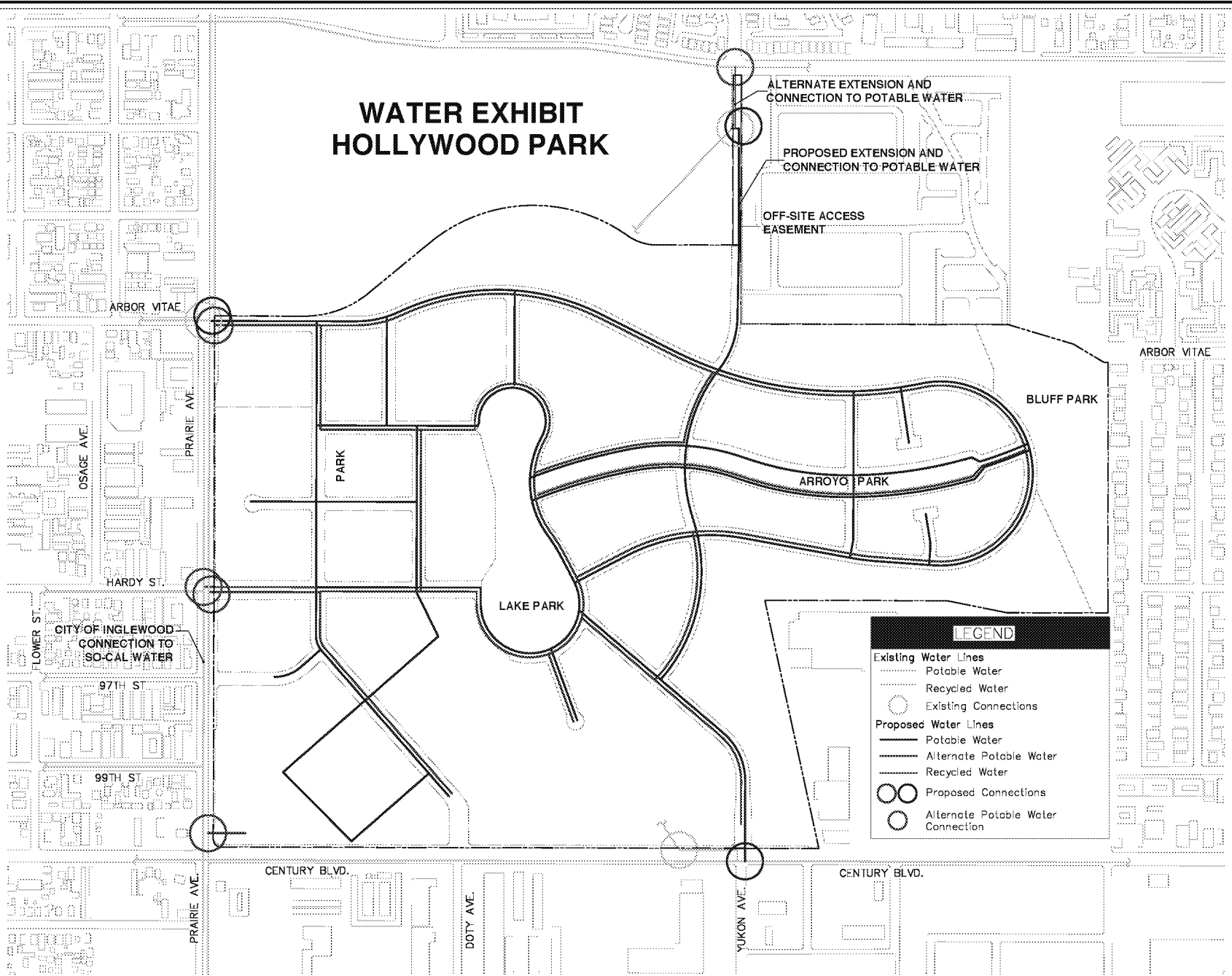
<sup>7</sup> *City of Inglewood General Plan Update Technical Background Report 2006, Section 3.1 Water System.*

<sup>8</sup> *See Appendix F-6 to this Draft EIR, WSA, Section F.*

<sup>9</sup> *WSA and attached letter from Department of Water Resources, dated July 21, 2008. See Appendix F-6 to this Draft EIR.*

<sup>10</sup> *City of Inglewood General Plan Update Technical Background Report 2006, Section 3.1 Water System.*

# WATER EXHIBIT HOLLYWOOD PARK



Source: Hall & Foreman, Inc. June 23, 2008.



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



Figure IV.J-1  
Existing and Proposed Water  
Infrastructure Map



**Table IV.J-1  
Existing Water Infrastructure Serving the Project Site**

Location	Size	Notes
<b>Water</b>		
Prairie Avenue	City of Inglewood 8" to 10" C.I., LADWP 60" Concrete, 8" SoCal Water connect to 8" Inglewood at Century Blvd	Service meter at Arbor Vitae Existing 2" domestic feed
Century Boulevard	LADWP 36" Steel, 54" Concrete, City of Inglewood 6" A.C.	Service meter at Yukon Avenue Existing 10" domestic feed
W. 90 <sup>th</sup> St/Pincay	City of Inglewood 24" RCCP and 24 PCC	Service meter at Carlton Dr. Existing 8" and 10" domestic feeds
<b>Recycled Water</b>		
Prairie Avenue	36-inch	Existing 4-inch meter/connection to Hollywood Park site along Prairie Avenue near Hardy Street
<i>Source: Hall and Foreman, Inc. June 23, 2008.</i>		

### *Fire-Flow*

The City of Inglewood receives fire protection services from the Los Angeles County Fire Department (LACoFD). In accordance with County of Los Angeles Fire Department fire flow availability tests were undertaken at the site by the City of Inglewood on December 11, 2006.<sup>11</sup> The tests were to ascertain a fire flow at 20-psi for in excess of a 3-hour duration. The results were as follows:

- Hollywood Park: Century Bl. & Club Dr., 12-inch water main, static pressure 104-psi, residual pressure 98-psi, fire flow @ 20 psi for 3 hrs.: 6,009-gpm;
- Hollywood Park: Prairie Ave. & La Brea Dr., 10-inch water main, static pressure 75-psi, residual pressure 70-psi, fire flow @ 20 psi for 3 hrs.: 4,665-gpm;
- Hollywood Park: Pincay & Prairie, 24-inch water main, static pressure 71-psi, residual pressure 67-psi, fire flow @ 20 psi for 3 hrs.: 5,139-gpm.

## **ENVIRONMENTAL IMPACTS**

### **Thresholds of Significance**

In accordance with Appendix G of the State CEQA Guidelines, a significant impact would occur if:

<sup>11</sup> County of Los Angeles Fire Department, Fire Prevention Division, Information on Fire Flow Availability for Building Permit, Fax date: December 14, 2006 (See Appendix F-5: Service Provider Responses).

- (a) A project would require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause a significant environmental effect; or
- (b) If there were insufficient water supplies available to serve the project from existing entitlements and resources, or new or expanded entitlements were needed.

## **Project Impacts**

### ***Construction***

Construction of the Proposed Project will utilize water for various construction activities including watering the site for soil compaction and dust suppression purposes as well as cleaning construction equipment and surface areas. It is anticipated that the construction related water use would utilize reclaimed water for all construction related purposes. Since the project site is currently served by reclaimed water infrastructure, no new service connections or off-site infrastructure improvements would be required.

The initial filling of the lake will create an increased water demand during the lake filling operations (likely to occur at the end of the construction process). The higher water demand is considered to be short-term and would cease when the lake filling operations end. Accordingly, there is minimal impact on the long-term operational water usage resulting from the lake filing operations. Therefore, construction activities would not impact the local water supply and impacts would be less than significant.

### ***Operation***

The proposed development is a "Project" as defined in Section 10912 (a) of the State Water Code, and is thus subject to the provisions for determining water availability as outlined in Section 10910-10915 of the State Water Code. Because the Proposed Project exceeds the 500 dwelling unit threshold; a WSA was requested to determine the City's ability to meet the water demands of this project. The following discusses the methodology used to assess the Proposed Project's water demands in consideration of the existing and planned water supplies available to serve the City of Inglewood service area. A detailed analysis of the projects impacts to the current and future water supplies follows.

### ***Estimated Water Demands***

The water demands for the Proposed Project were outlined in a letter report to Wilson Meany Sullivan, LLP dated July 17, 2008 (see WSA, Appendix F-6 to this EIR). The letter report was prepared by Stetson Engineers, Inc. and submitted to the City of Inglewood for review. The water demand for the Proposed Project is based on Stetson's review of the land uses provided in the Hollywood Park Specific Plan, water demand factors for similar types of land uses, and water demand factors for existing land uses in the City of Inglewood as presented in the City of Inglewood's 25 Year Water Master Plan dated September 2003.

Stetson's estimated water demands were approved by the City Engineer and incorporated into the WSA (See Appendix F-6 to this EIR).<sup>12</sup>

As shown in Table IV.J-2, below, the WSA estimates the total projected water demands for the project would be approximately 667,261 gallons per day (gpd), or 747.43 AF/yr. Approximately 575,504 gpd (or 86 % of the Project's total water demand) would serve the Project's residential component. This is an average of 192 gallons per day (gpd)/dwelling unit of residential domestic water demand for the Proposed Project. The results of the analyses were compared to two other developments in Southern California with a similar mix of residential dwelling unit densities and extensive use of reclaimed water. The letter report concludes that the Hollywood Park Redevelopment Project's average water demand factors are similar to the water demand factor of 176 gpd/dwelling unit used in the Draft EIR for the Village at Playa Vista Project located in the City of Los Angeles, and to the water use factor of 180 gpd/dwelling unit developed from existing water uses by the City of Whittier for the water supply assessment for the Uptown Whittier Specific Plan.

**Table IV.J-2  
Estimated Potable Water Demand for Proposed Project**

Project Land Use	Quantity	Unit	Demand Factor	Total (GPD)
<b>DOMESTIC WATER</b>				
Mixed Use (R-M)	4.45	AC	5,210 GPD/AC*	23,185
Residential SFD (R-1)	35	DU	336 GPD/DU *	11,760
Residential SFD (R-1.5, R-2, R-2A)	16.35	AC	1,926 GPD/AC *	31,490
Residential TH (R-3)	71.36	AC	5,210 GPD/AC *	371,786
Residential WRAP/PODUIM (R-4, R-M)	26.35	AC	5,210 GPD/AC *	137,284
<b>Subtotal Residential =</b>				<b>575,505</b>
Commercial/Retail	36.36	AC	1,680 GPD/AC *	61,085
Hotel	4.95	AC	1,680 GPD/AC *	8,316
Casino/OTB	5.64	AC	1,680 GPD/AC *	9,475
Civic Use	4	AC	1,680 GPD/AC *	6,720
Lake Water Replenishment	4	AC	1,540 GPD/AC **	6,160
<b>TOTAL DOMESTIC USES =</b>				<b>667,261</b>
<i>Source: Water Supply Assessment and attached letter from Stetson Engineers, Inc., dated July 17, 2008.</i>				

#### *Related Development Project Demand Considerations*

Estimated water demand values were included in the 2005 UWMP projections for three development projects (Haagan, Renaissance and Bay Meadows). The Bay Meadows development project is now called

<sup>12</sup> The July 17, 2008 letter from Stetson estimated that the average existing usage at Hollywood Park is 317 AF/yr. However, recent historical water demand (Fiscal Years 2003-2007), based on data provided by the City, for the existing Hollywood Park Facilities shows an average of 359.96 AF/yr. Thus, the WSA and this EIR uses 359.96 AF/yr in the analysis.

Hollywood Park. Since there was little information on the particulars of the three development projects at the time of the preparation of the 2005 UWMP, preliminary estimates of water demands were made and a total demand for the three developments was assigned for use in the comparison studies. The 2005 UWMP estimated that the three development projects would demand 360.60 AF/yr. Subsequent to the preparation of the 2005 UWMP, two of the three development projects (Haagan and Renaissance Development Projects) have been implemented within the City of Inglewood.

Even though the two developments have only been in operation for a relatively short period of time, there is water usage data available for these projects. This data, plus the water usage data of the existing Hollywood Park facilities, can be used to deduce an estimated amount of water demand that can be attributed to the Hollywood Park Redevelopment Project that was not already accounted for in the 2005 UWMP.

As previously noted, the 2005 UWMP estimated a total water demand of 360.60 AF/yr for all three development projects. Based upon water demand data currently available for the Haagan and Renaissance developments, it is estimated that the Haagan development water demand is 29.53 AF/yr and the water demand for the Renaissance development is 46.76 AF/yr.

Recent historical water demand (Fiscal Years 2003-2007) for the existing Hollywood Park facilities shows an average of 360 AF/yr. The water demand for the existing Hollywood Park facilities would offset (as a credit) the proposed water demands for the Hollywood Park Redevelopment Project, while the water demands of the Haagan and Renaissance developments would reduce the amount of available water attributable to the Hollywood Park Redevelopment Project in the 2005 UWMP.

Comparing the water demand estimated in the 2005 UWMP to the proposed water demands for the two alternatives for the Hollywood Park Redevelopment Project yields the amount of water not accounted for in the 2005 UWMP for the Hollywood Park Redevelopment Project.

Mathematically, this is shown below.

$$\text{Haagan [H]} + \text{Renaissance [R]} - \text{Existing Hollywood Park [EHP]} + \text{Proposed Hollywood Park Redevelopment Project [HPRP]} = \text{The Total Water Demand for All Three Developments}$$

$$\text{For the Hollywood Park Redevelopment Project: } 29.53 \text{ AF/yr [H]} + 46.76 \text{ AF/yr [R]} - 359.96 \text{ AF/yr [EHP]} + 747.43 \text{ AF/yr [HPRP]} = 463.76 \text{ AF/yr}$$

The 463.76 AF/yr is the total projected water demand for the three developments based upon available water usage data and the projected water demand for the Hollywood Park Redevelopment Project. Only 360.60 AF/yr was attributed to the three developments in the 2005 UWMP, leaving a deficit of 103.16 AF/yr. At a minimum, the Hollywood Park Redevelopment Project would be responsible for providing the 103.16 AF/yr to meet its water demand.

Using the additional water demands of 103.16 AF/yr generated by the proposed Hollywood Park Redevelopment Project, a recalculation of the impact of these demands upon the City's water supply

under a normal water year, single dry water year, and multiple water years was conducted. In the analysis, the water supplies were left unchanged from the 2005 UWMP, but the water demand for each scenario (normal water years, single dry water year, and multiple water years) was increased by 103.16 AF/yr. Recycled water demands for the proposed Hollywood Park Redevelopment Project were not added into the calculations because WBMWD has ample available supply to meet the increased recycled water demands as proposed. Whatever recycled water demands that would be added, would be offset by increasing the amount of supply of recycled water by the same amount as the demand yielding a net of zero. Recycled water supply is discussed in further detail below.

Table IV.J-3 shows the water supply and demand comparison for the Proposed Project. The water demand of 103.16 AF/yr (rounded off to 103 AF/yr) was added to the water demand values presented in the 2005 UWMP for the years shown. The results show that there is a deficit of water supply in the later years (2025 and/or 2030) for the normal water year and the multiple dry water years scenarios resulting from the increased water demand associated with the Proposed Project.

**Table IV.J-3  
Water Supply and Demand Comparison for the Proposed Project**

	Year				
	2010	2015	2020	2025	2030
<b>Normal Water Supply Year</b>					
Projected Supplies <sup>1</sup>	14,553	14,553	14,553	14,553	14,553
Projected Demand <sup>2,3</sup>	13,732	14,032	14,332	14,632	14,932
Difference	821	521	221	(79)	(379)
<b>Single Dry Water Year</b>					
Projected Supplies <sup>4</sup>	13,527	13,527	13,527	13,527	13,527
Projected Demand <sup>5,3</sup>	12,329	12,629	12,899	13,169	13,439
Difference	1,198	888	618	349	78
<b>Multiple Dry Water Years</b>					
Projected Supplies <sup>6</sup>	14,553	14,553	14,553	14,553	
Projected Demand <sup>7,3</sup>	13,732	14,032	14,332	14,632	
Difference	821	521	221	(78)	
<sup>1</sup> From Table 13 in the City of Inglewood 2005 UWMP. <sup>2</sup> From Table 13 in the City of Inglewood 2005 UWMP and increased by the additional domestic water demand for the Hollywood Park Redevelopment Project (103 AF) <sup>3</sup> Demand does not include additional demand for recycled water because it is presumed that the increase in demand for recycled water can be met without concern due to supply availability from WBMWD; adding the recycled water demand would skew the domestic analysis unfairly <sup>4</sup> From Table 16 in the City of Inglewood 2005 UWMP. <sup>5</sup> From Table 16 in the City of Inglewood 2005 UWMP and increased by the additional domestic water demand for the Hollywood Park Redevelopment Project (103 AF) <sup>6</sup> From Tables 19, 22, 25 & 28 in the City of Inglewood 2005 UWMP. <sup>7</sup> From Tables 19, 22, 25 & 28 in the City of Inglewood 2005 UWMP and increased by the additional domestic water demand for the Hollywood Park Redevelopment Project (103 AF) Source: Hollywood Park Redevelopment Project Water Demands, Letter Report, Stetson Engineers, Inc., July 17, 2008.					

Should the development plans be phased in over time, water demand impacts would be phased in as well. But ultimately, the full effect of the water demand impacts will be realized upon complete implementation of the Proposed Project.

As indicated earlier, this analysis did not include any reduction in water supplies resulting from the potential 30% reduction in wholesale water supplies from MWD since it is not clear yet what the actual impact would be to the City of Inglewood. The City of Inglewood water supply sources include both imported water and groundwater.

Over the seven year period from 2000-2007, the average shows 43.58% pumped versus 56.42% imported. Since the 30% reduction applies only to imported water, 30% of 56.42% yields a 16.93% overall reduction. If this reduction of supplies was applied in the above water supply and demand comparison, it would show greater water supply deficits, and further indicate the need for the Hollywood Park Redevelopment Project to augment the supply of water through groundwater or other supplies in order to meet the water demands of the Proposed Project.

#### *Recycled Water Demand*

The Proposed Projects recycled water demand could be met through treated water from the West Basin Municipal Water District water treatment plant in El Segundo. The project would include the construction of a piped recycled water distribution system within the project area. The primary infrastructure would consist of a looped ring-main with extensions to provide service to the public parks, landscaped parkways, and privately maintained common landscape areas (i.e. home owner association) within the proposed lots. This will be installed under the roadways in the public right of way. The project would connect to the existing WBMWD recycled supply line running along Prairie Avenue. The on-site network would be operated and maintained by City of Inglewood Water Department.

As shown in Table IV.J-4, below, the Proposed Project is estimated to generate a demand of 179,229 gpd (200.76 AFY). By taking into account a reduction of 11,370 gpd (13 AF/Y) of recycled water that is currently generated by the existing land uses on the Project Site, the total estimated water demand increase is 167,859 gpd. WBMWD has indicated that the increased demand for recycled water can be met by its current supply<sup>13</sup> and that there is ample capacity and pressure in the pipeline to meet the demands of the Hollywood Park Redevelopment Project.<sup>14</sup> Thus, the impact of the increased recycled water usage is less than significant.

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<sup>13</sup> WSA Section VI and attached letter from WBMWD, dated July 7, 2008.

<sup>14</sup> WSA Section VI and WBMWD will serve letter dated March 29, 2007.

**Table IV.J-4  
Estimated Recycled Water Demand for Proposed Project<sup>15</sup>**

<b>Project Land Use</b>	<b>Quantity</b>	<b>Unit</b>	<b>Demand Factor</b>	<b>Total (GDB)</b>
Parks (Recycled Water)	21.72	AC	3,445 GPD/AC ***	74,825
Public Streets (Recycled Water)	9.93	AC	3,445 GPD/AC ***	34,195
Private HOA Open Space	20.38	AC	3,445 GPD/AC ***	70,209
<b>TOTAL RECYCLED WATER USES =</b>				<b>179,229</b>
<i>Source: Hollywood Park Redevelopment Project Water Demands, Letter Report, Stetson Engineers, Inc., July 17, 2008.</i>				

### *Fire-Flow*

The on-site network would be operated and maintained by City of Inglewood Water Department. As determined in consultation with the LACoFD, for the design of the water network to meet LA County fire flow requirements the following criteria will be applied:

- required total water flow shall be the sum of the minimum fire flow plus the maximum daily water flow requirements;
- average daily design flow shall be at a normal operating pressure of not less than 35 p.s.i. nor more than 125 p.s.i.;
- minimum fire flow and fire hydrant requirements shall be determined by the fire chief or fire marshal;
- available fire flow shall be based upon a minimum of 20 p.s.i. residual operating pressure remaining in the street and the fire flow will not exceed 5,000 gpm; and
- minimum size for use in the distribution shall be nominal 6-inch diameter on which hydrants are located.

With implementation of the criteria identified above, the Proposed Project would meet the required fire flow needs of the proposed development and impacts would be less than significant. See Section IV.J.2, Fire Protection, for a complete discussion of existing fire flow requirements.

### *No Need for New or Expanded Water Facilities*

The City's water distribution system consists of 808,000 feet (152 miles) of pipe, ranging in size from 3 inches to 30 inches in diameter and providing water for residential, commercial, industrial and fire

<sup>15</sup> WSA and attached letter from Stetson Engineers, Inc., dated July 17, 2008, Table 1.

suppression. The City's treatment plant is located on 3 acres and has capacity to treat 8.5 million gallons per day of groundwater. The City operates 4 wells that extract local groundwater from the West Coast Basin and treats it at the treatment plant. The City also maintains 3 pumping stations with a total of 24 separate pumps; and 3 reservoirs ranging in individual capacity from 1 million gallons to 16 million gallons of water with an overall storage capacity of 21.6 million gallons of water.<sup>16</sup>

There are also 198 Backflow prevention devices and 1,250 devices for internal protection. The system has about 1,540 fire hydrants and 2,600 gate valves. Because of the large variation in the service area elevations, the City's water system has three pressure zones. All three are closed zones without a free water surface control. System pressure is maintained through pumping and the pressure at the imported water connections for Zones 2 and 3, and normally through a pressure regulating station for Zone 1.<sup>17</sup>

The Proposed Project would result in an increase in the amount of water demanded for the Project Site and what was accounted for in the 2005 UWMP. As further discussed below *under "Additional Pumping of City's Adjudicated Water Rights,"* the City currently has ground water pumping wells (wells #1, 2, 4, and 6 are in service), and the 2005 UWMP has anticipated the need for additional wells. Likewise, the City currently has two connections with MWD through which it purchases imported water; six connections to Golden State Water Co.; two connections to the Los Angeles Department of Water and Power; and 16 connections to supply reclaimed water from WBMWD. Because additional pumping can utilize existing facilities, the need for additional infrastructure beyond what is currently available or anticipated would not be required, and any need for new or expanded water facilities for the City would be required independent of whether the Proposed Project is implemented. Upgrades to existing infrastructure would be more likely to take place over the course of several years, and the costs of such upgrades would likely be financed through water charges or impact fees. Since the Proposed Project would not require construction or expansion of existing water facilities, impacts would be less than significant.

### **Land Use Equivalency Program**

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area. More specifically, the under the Proposed Equivalency Program residential units could be increased to a maximum of 3,500 units with a corresponding decrease in other land uses.

Water consumption impacts pertaining to construction activities under the Equivalency Program would be nearly identical to those that would occur under the Proposed Project and would not result in increased water consumption impacts, given the similarity in nature and intensity of construction activities under both development scenarios. Furthermore, operational impacts to distribution infrastructure (potable and

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<sup>16</sup> 2005 UWMP at page I-7.

<sup>17</sup> *Ibid.*



recycled water infrastructure) under the Equivalency Program would be similar to the Proposed Project, as City of Inglewood oversight of design and planning of water distribution infrastructure under the Equivalency Program (i.e., to ensure system adequacy) would still occur.

Operational potable water consumption under the Equivalency Program would, under some development scenarios (e.g., all of the Maximum Housing scenarios), result in greater potable water supply impacts than under the Proposed Project. As presented in the WSA, potable water consumption for the Proposed Project would be 667,261 gpd. In addition to the Project, the WSA analyzed the impacts of a Maximum Housing Alternative with up to 3,500 dwelling units (See Alternative RU 3,500 in Section VI.E., Alternatives to the Proposed Project). Under that scenario the water demands for a Maximum Housing Alternative with 3,500 dwelling units would be approximately 712,692 gpd. Overall, the impacts to potable water demand of the Equivalency Program would fall somewhere between the impacts analyzed for the Proposed Project and Alternative RU 3,500. The analysis of Alternative RU 3,500 represents a more intensive development than the scenarios under the Equivalency Program, since under the Equivalency Program, an increase in the intensity of one land use results in the decrease in the intensity of another land use. For example, unlike Alternative RU 3,500 analyzed in the WSA, when 3,500 units are constructed on the Project Site under the Equivalency Program, 620,000 sf of retail space cannot be constructed—at most 590,200 sf of retail could be constructed. As a result, the impacts analyzed in Alternative RU 3,500 represent the greatest level of impacts that could result from implementing the Equivalency Program. Further, like the Proposed Project, additional pumping that may be required with implementation of the Equivalency Program can be accommodated by existing facilities, and the need for additional infrastructure beyond what is currently available or anticipated would not be required.

Recycled water consumption impacts during operation of land uses under the Equivalency Program would be equivalent to the Proposed Project, given the same landscaped area and amount of parks and open space. As such, construction impacts, as well as operational impacts related to distribution infrastructure and recycled water supply would be less than significant under the Equivalency Program, as is the case with the Proposed Project, since the total estimated water demand at buildout would not exceed available recycled water supplies or potable/reclaimed distribution infrastructure capabilities.

## **CUMULATIVE IMPACTS**

Implementation of the Proposed Project including the proposed Land Use Equivalency Program scenarios in conjunction with the related projects identified in Section III (Related Projects) would further increase demands for water supply. The Related Projects identified in Section III includes projects located throughout the City of Inglewood, the City of Culver City, the City of Hawthorne, the City of Los Angeles, and the County of Los Angeles. For purposes of this analysis, only the Related Projects that fall within the City of Inglewood's Water Service Area are included because the City of Inglewood is the applicable water purveyor. All of the remaining related projects located within the cities of Culver City, Hawthorne and Los Angeles, and Los Angeles County are served by other water agencies and, as such, fall under the purview of separate UWMP. Based upon information contained in the City of Inglewood's Water Master Plan prepared in 2003, approximately 84% of the City is served by the City's water system. Twelve of the related projects that are located within the City of Inglewood, including Related Projects

No. I-1, I-5, I-7, I-8, I-16, I-18, I-20, I-27, I-28, I-29, I-31, I-32, and I-33 are located outside the City's water service area and are served by the Cal- America Water Company. As such these projects would not affect the available water supply within the Inglewood water service area.

Each of the related projects that are within the City of Inglewood water service area that are consistent with the underlying zoning and General Plan and growth assumptions in which the Water Management Plan was based on have already been accounted for in the water supply areas cumulative demand. For any related projects that are non consistent with these assumptions, or meet the criteria set forth in SB 610 calling for the preparation of a Water Supply Assessment, a separate analysis demonstrating sufficient water supply is available would be required on a project-by-project basis. In addition, in projecting the future water demands for the City, the UWMP assumed a 2.5% increase in the resident population within the service area every five years with a 57% increase in commercial water service connections over the next 20 years.

With respect to long-term planning projections, the UWMP concluded that the projected water demands through the year 2030 can be met for the normal year supply and demand projections based upon the projected supplies, except in 2030 when the City may have to purchase approximately 2% of additional supplies. For single dry year and in multiple dry year conditions, the City would have sufficient supplies to meet the demand under the present day scenario. Historically, the City has been able to meet demand during single dry year and multiple dry year conditions by importing additional water from the WBMWD. In the future, the City may not be able to meet demand in single dry years or multiple dry years if regional agencies are unable to supply sufficient supply to all its member agencies. As such, the City is committed to aggressively seeking ways to reduce water demands and increase water supplies. Similar to the water conservation mitigation measures imposed for the Proposed Project, water conservation strategies and conditions would apply to each of the related projects to further reduce future water demands. Therefore, cumulative water impacts would be less than significant.

## **PROJECT DESIGN FEATURES**

PDFs to implement energy and water conservation measures in accordance with the Sustainability Checklist contained in the Hollywood Park Specific Plan are identified in Section IV.B, Air Quality.

## **MITIGATION MEASURES**

### **Potential Sources of Additional Water**

California Water Code Section 10911 explains that if the City concludes that water supplies are, or will be, insufficient, "the city or county shall include in its water supply assessment its plans for acquiring additional water supplies, setting forth the measures that are being undertaken to acquire and develop those water supplies." Section 10911 also provides that the water supply assessment include information concerning estimated costs and proposed financing for the additional water supplies; permits, approvals and entitlements anticipated for the additional water supplies; and estimated timeframes to acquire the additional water supplies. Because the project water supply analysis indicates a deficit of 103 AF/yr for

the Proposed Project (and a maximum of 154 AF/yr under the proposed Land Use Equivalency Scenario), the following discussion addresses additional water supplies in accordance with Section 10911.

Additional sources of water, as more fully discussed below, include the following:

- A. Additional pumping of City's adjudicated water rights
- B. Utilization of additional leased or purchased ground water rights
- C. Combination of the additional pumping and acquisition of additional water rights
- D. Conservation

As noted above, utilization of additional imported water is not reliable due to uncertainty surrounding potential reduction in water supplies resulting from the possible 30% reduction in wholesale water supplies from MWD. Therefore it is assumed that any deficit will be made up from groundwater or conservation.

#### *Additional Pumping of City's Adjudicated Water Rights*

In Fiscal Year 2007, the City had 4,449.89 AF of water rights, plus a carryover of 788.94 AF water rights. According to the West Coast Basin Watermaster records for FY 2007, the City pumped 3,551.28 AF from groundwater supplies and purchased 7,527.10 AF of imported water. Thus, in FY 2007 the City did not pump 1,687.55 AF of its adjudicated water rights.

This additional water supply can be pumped from the City's existing or already planned for wells due to the long-term reliability of groundwater supply managed by the Water Replenishment District (WRD) of Southern California. WRD is managing the West Basin groundwater supply through its replenishment, monitoring and water quality activities. With its shift to more recycled water for supply to seawater intrusion barriers and the establishment of groundwater storage in the basin, groundwater supply reliability will continue to improve. With the completion of Phase V Expansion of the Edward C. Little Water Recycling Facility and future barrier water supply projects, "all replenishment to the West Coast Basin, the source of the City's groundwater production, will be immune to drought and other supply challenges."<sup>18</sup>

Likewise, the West Basin Municipal Water District (West Basin) has indicated that it has developed a model water conservation ordinance which will have a positive affect on water reliability in the West Coast Basin. As previously discussed, the conservation ordinance includes increasing the use of recycled water for injection at the West Coast Seawater Barrier; conversion of the Dominguez Gap Seawater Barrier from imported water to recycled water sources; development of ocean-water desalination planned

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<sup>18</sup> See letters attached to the WSA from WRD, Re: Groundwater Supply Reliability, dated July 23, 2008, and West Basin Municipal Water District, dated July 7, 2008.

by 2020; implementation of its Conservation Master Plan; and participation in groundwater conjunctive use programs. In summary West Basin notes: “Through the implementation of these actions West Basin will meet 60% of the service area needs through conservation and locally controlled supply sources by 2020, compared roughly to one-third today.”<sup>19</sup>

Thus the 1,687.55 AF of the City’s adjudicated water rights is a significant source of additional water available to the City, which can be safely pumped from City wells without an impact on groundwater supply. This 1,687.55 AF of water would be available to cover the deficits under either Alternative 1 or Alternative 2 (as described in the WSA). More specifically, the City could pump an additional 103.16 AF and still have 1,584.39 AF of unpumped water rights to satisfy other City water demands.

This 1,687.55 AF of water also provides a source to address the potential reduction of 16.93% of the City’s water supply (see previous discussion of the 16.93% potential reduction due to potential reductions in imported water.) More specifically, the loss of 16.93% of the City’s overall water supply in 2007 (11,078.38) would have resulted in a deficit of approximately 1,875 AF. As further discussed below, it is expected that the City will be able to lease at least an additional 343 AF of water in the future, even assuming that the reductions in wholesale water availability create more demand on Basin sources.

Additional pumping of the City’s existing adjudicated water rights will result in costs comparable to the existing WBMWD rates for pumping and treating ground water. Furthermore, in the event that prices rise due to drought or water shortage, the West Coast Basin Judgment provides a pricing mechanism to obtain a groundwater lease from the exchange pool which includes a maximum price not to exceed the sum of the price per acre-foot charged by the Metropolitan Water District (MWD) of Southern California to WBMWD plus the additional amount per acre-foot charged by the latter to municipalities and public utilities for water received from said MWD.

The City currently has ground water pumping wells, and the UWMP has anticipated the need for additional wells, however, the additional infrastructure beyond what is currently anticipated would not be required. Likewise, additional permits or entitlements would not be required, as the City is already authorized to pump its current and potential additional adjudicated water rights.

### *Additional Leasing of Water Rights*

The September 2007 report entitled “Watermaster Service in the West Coast Basin, Los Angeles County, July 1, 2006- June 30, 2007” (2007 Watermaster Report), explains that of the 64,468 AF of adjudicated rights in the basin there was approximately 38,933.63 AF of adjudicated rights that was not extracted.<sup>20</sup> Moreover, the 2007 Watermaster Report states that during the applicable period there were 11 water right

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<sup>19</sup> See letters attached to the WSA from WRD, Re: Groundwater Supply Reliability, dated July 23, 2008, and West Basin Municipal Water District, dated July 7, 2008.

<sup>20</sup> 2007 Watermaster Report at page 8, Table 2.

leases totaling 7,580.90 AF and three permanent transfers of water right ownership.<sup>21</sup> Table 2 of the 2007 Watermaster Report lists approximately 55 individuals and entities (not including the City of Inglewood) with adjudicated rights. Thus, in the 2006 to 2007 year, there was approximately 38,934 AF available that could have been leased from approximately 44 different individuals and entities. Because of the abundance of unextracted water as well as the wide variety of parties who have unused adjudicated rights at this time, it is reasonable to conclude that in future years the City may lease additional water from other parties with adjudicated rights. Even if the availability of Basin water is reduced substantially due to increasing demand on groundwater rights by other producers, if even a fraction of the currently unused 38,934 AF remain available for lease, the City will be able to satisfy its projected needs and the Project's projected needs.

When calculating the projected water supplies for the City, the 2005 UWMP explains that the net leases/exchanges is 340 AF per year averaged over an 18 year period.<sup>22</sup> Historically, the City has leased water from a wide variety of sources in amounts ranging from 282 to 1,700 AF/yr. This history of leasing from a variety of sources in amounts up to 1,700 AF/yr combined with the availability of adjudicated water rights available for lease as previously discussed, further indicates that additional leasing is a viable and likely component of the City's future water supplies.

Thus, mitigation measures are required for the Project which will secure a long term water supply for the Proposed Project and impose conservation measures similar to those that would be imposed during dry or multiple dry years. So long as the water supply deficit generated by the Proposed Project is addressed, water supply impacts will be reduced to less than significant. Due to the unaccounted for domestic water demand is in the Normal Water Supply Year 2030 as well as the uncertainty with regards to SWP supplies, the following mitigation measures are required:

- MM J.1-1. The Applicant shall lease or convey to the City its sufficient adjudicated pumping rights to cover the projected project related water supply deficit (i.e., 103 or 154 AF/yr).
- MM J.1-2. The Applicant shall ensure all toilets installed within the project will be high efficiency models.
- MM J.1-3. The Applicant shall ensure all urinals installed within the project will be high efficiency models.
- MM J.1-4. The Applicant shall ensure shower fixtures shall be limited to one showerhead per shower stall.

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<sup>21</sup> 2007 Watermaster Report at page 4.

<sup>22</sup> 2005 UWMP at page 11-5.

- MM J.1-5. The Applicant shall ensure any residential dishwashers provided on site will be high efficiency dishwashers (Energy Star rated).
- MM J.1-6. The Applicant shall ensure domestic water heating systems will be located in close proximity to point(s) of use, as feasible; and shall use tankless and on-demand water heaters, as feasible.
- MM J.1-7. The Applicant shall ensure the on-site irrigation system will include the following requirements:
- Weather-based irrigation controller with rain shutoff;
  - Flow sensor and master valve shutoff (large landscapes);
  - Matched precipitation (flow) rates for sprinkler heads;
  - Drip/microspray/subsurface irrigation where appropriate;
  - Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials; and
  - Use of landscape contouring to minimize precipitation runoff.
- MM J.1-8. The Applicant shall ensure the Project will provide individual metering and billing for water use for all dwelling units.
- MM J.1-9. The Applicant shall ensure that the Project will utilize recycled water for appropriate end uses (irrigation).
- MM J.1-10. The Applicant shall comply with the Standard Urban Storm water Mitigation Plan (SUSMP) and shall encourage implementation of Best Management Practices that have stormwater recharge or reuse benefits.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

With respect to threshold question (a), the City currently has ground water pumping wells, and the UWMP has anticipated the need for additional wells. However, the need for additional infrastructure beyond what is currently anticipated would not be required to carry out the Proposed Project, including the Equivalency Program, and any need for new or expanded water facilities for the City would be required independent whether the Proposed Project is implemented. Therefore, the Proposed Project would not require or result in the construction of new water facilities or expansion of existing facilities, and impacts would be less than significant.

With respect to threshold question (b), with implementation of the mitigation measures recommend above, the water supply deficit generated by the Proposed Project, including the Equivalency Program, is

addressed through a variety of potential sources of additional water including pumping, leasing, or purchasing of water supplies. Additionally, the Proposed Project would impose conservation measures similar to those that would be imposed during dry or multiple dry years. Therefore, sufficient water supplies would be available to serve the Proposed Project from existing entitlements and resources, and water supply impacts will be reduced to a less than significant level.

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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**J. PUBLIC UTILITIES**  
**2. WASTEWATER**

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**ENVIRONMENTAL SETTING**

**Regional Infrastructure**

Sewer and wastewater service within the City of Inglewood is provided by the City of Inglewood Department of Public Works and the Los Angeles County Sanitation District (LACSD). LACSD boundaries encompass approximately 85,019 acres, and contain approximately 155 miles of sewer mains in the City of Inglewood, with a total of 16,177 active refuse accounts in the City. The LACSD manages wastewater collection and treatment for the City of Inglewood. The wastewater from the City primarily flows to the Joint Water Pollution Control Plant (JWPCP) located in the City of Carson. The wastewater flow from the City to the LACSD treatment facility is estimated to be 10.6 million gallons per day (mgpd), of which approximately 8.9 mgpd is from the portion of the City served by the City's water system. Additionally, LACSD is responsible for monitoring industrial waste discharges into the wastewater system.<sup>23</sup>

The JWPCP provides treatment capacity for all wastewater flows generated within the Project Area. The JWPCP provides primary and secondary treatment for approximately 320 million gallons of wastewater per day. The plant services a population of approximately 3.5 million people throughout Los Angeles County. Prior to discharge, the treated wastewater is disinfected with hypochlorite and sent to the Pacific Ocean through a network of outfalls, which extend two miles off the Coast of Southern California into the Palos Verdes Peninsula.

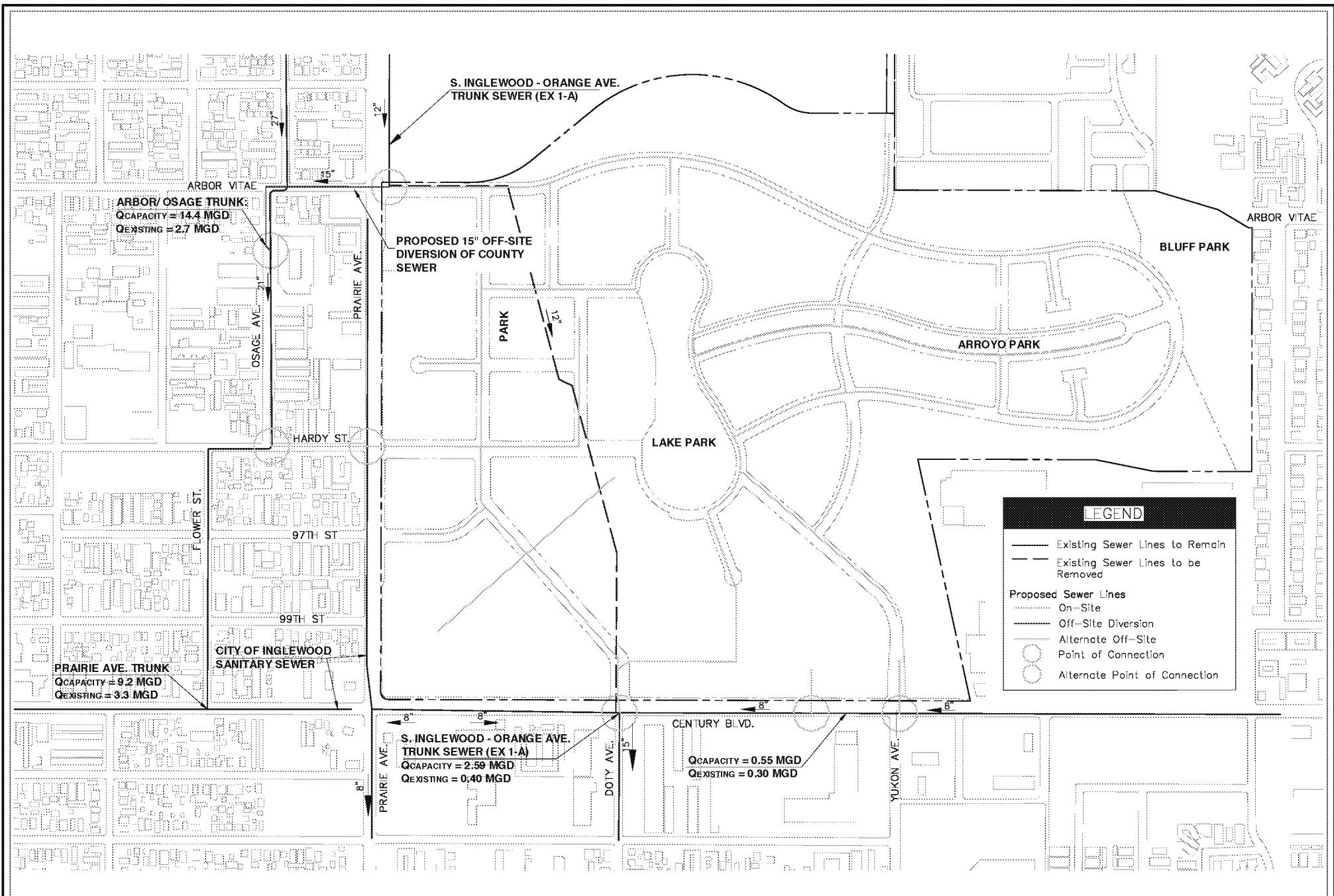
**Wastewater Infrastructure**

The Proposed Project is located in an area that is adequately served by existing wastewater infrastructure. Local sewer infrastructure in the City of Inglewood is maintained by the City of Inglewood Public Works Department. Wastewater conveyance lines exist in the vicinity of the project area and consist of county trunk-sewers and City of Inglewood local collector-sewers (See Figure IV.J-2, Existing and Proposed Sewer Infrastructure Map). The Proposed Development is located within the jurisdictional boundaries of District No. 5. The Districts' 21-inch diameter Prairie Avenue Trunk Sewer, located at Hardy Street at Osage Avenue, has a design capacity of 14.4 mgpd and conveyed a peak flow of approximately 2.7 - mgpd when last measured in 2007. The Districts' 24-inch diameter Prairie Avenue Trunk Sewer, located at Century Boulevard and Flower Street, has a design capacity of 9.2-mgpd and conveyed a peak flow of 3.3- mgpd when last measured in 2007.

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<sup>23</sup> 3.2 Sewer and Wastewater, City of Inglewood General Plan Update Technical Background Report, 2006.





Source: Hall & Foreman, Inc. June 23 2008.



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 Environmental Planning and Research



Figure IV.J-2  
 Existing and Proposed Sewer  
 Infrastructure Map

The Districts' 15-inch diameter South Inglewood-Orange Avenue Trunk Sewer, located in Doty Avenue at Century Boulevard, has a design capacity of 2.59 mgpd and conveyed a peak flow of 0.4 mgpd when last measured in 2007. The wastewater generated by the Proposed Project will be treated at the Joint Water Pollution Control Plant located in the City of Carson operated by the LACSD, which has a design capacity of 385-mgd and currently processes an average flow of 310.8-mgd.<sup>24</sup> Table IV.J-5 provides existing wastewater infrastructure that runs adjacent to the Project Site.

**Table IV.J-5  
Existing Wastewater Infrastructure Adjacent to the Project Site**

Location	Size	Notes
Prairie Avenue	City of Inglewood 8" south of Harbor Vitae flowing south, LA Co. Sanitation 10" trunk north of Arbor Vitae also flowing south	LA County 10" trunk enters Hollywood Park site across from Arbor Vitae
Century Boulevard	City of Inglewood 8" from Prairie Ave to Yukon Ave flowing toward convergence at Doty Ave	LA County 10" trunk becomes 12" Within Hollywood Park site, converges at Doty Ave. and continues south along Doty Ave as a 15" trunk
W. 90 <sup>th</sup> St/Pincay	City of Inglewood 10" V.C.P. flowing west Into LA County 10" trunk at Prairie Ave	

*Source: Hall & Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008.*

## ENVIRONMENTAL IMPACT

### Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a significant impact would occur if a project were to:

- (a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board; or
- (b) Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; or
- (c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

Wastewater generation associated with the Proposed Project was calculated using generation factors based on land use, as provided by the County of Los Angeles, which uses City of Los Angeles sewer load factors.<sup>25</sup> The estimated net increase was analyzed relative to infrastructure and treatment plant capacity.

<sup>24</sup> Hall & Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008.

<sup>25</sup> City of Los Angeles, CEQA Thresholds Guide, May 1998, p. K.2-20.

## **Project Impacts**

### *Construction*

Construction of the Proposed Project would require connections to the local sewerage conveyance infrastructure that is located in the right-of-way easements adjacent to the Project Site. The City of Inglewood sanitary system will be used to convey flows off site and connect into LACSD trunk sewers running close to the project site boundary. It is currently intended that a new on-site sewer gravity system will be provided to collect wastewater flows. The minimum size of sewer runs will be 8" lines installed under roadways within the public right of way or easements. This new system will be maintained and operated by City of Inglewood Department of Public Works upon completion of construction. The current redevelopment proposals will require the relocation and quit claim of the existing LACSD 12" sewer and associated easement that crosses the site. It is currently intended to relocate this route below the proposed public street network. This sewer will still be maintained and operated by LACSD. The installation of new sanitary sewers and the connection to existing sewer lines would require minimal trenching and pipeline installation on-site and at off-site locations in the public right-of-way. Such activities could result in temporary sidewalk or roadway lane closures for short periods of time but would not result in any adverse environmental impacts. Therefore, Project impacts with respect to the construction impacts to connect to the existing wastewater infrastructure would be less than significant.

### *Operation*

The Proposed Project's wastewater demand could be met through use of the Los Angeles County Sanitation District Joint Water Pollution Control Plant (JWPCP) wastewater treatment plant in the City of Carson. As shown in Table IV.J-6, below, the Proposed Project is anticipated to generate a net total of approximately 393,000 gpd of wastewater, or 143 million gallons annually. Sewage generated by the Proposed Project would continue to be conveyed and treated at the JWPCP, which has adequate capacity to accommodate the increased wastewater flows and thus RWQCB treatment standards area assured of being maintained.

Water conservation measures required by City ordinance (e.g., installation of low flow toilets and plumbing fixtures that prevent water loss, limitations on hose washing of driveways and parking areas, etc.) would be implemented as part of the Proposed Project and would help reduce the amount of wastewater generated by the Proposed Project. Such water conservation features are largely required by Title 24 building code requirements for new buildings. As such, Project impacts with respect to the wastewater treatment capacity would be less than significant.

The operational sewage generation for the Proposed Project represents approximately 0.16 percent of the JWPCP's daily effluent capacity (550 mgpd), or approximately 0.2% of JWPCP's current excess capacity (190 mgpd). These increases would be well within the excess treatment capacity currently available and projected to be available at JWPCP. Therefore, the Proposed Project's impact on wastewater services would be less than significant.

**Table IV.J-6  
Estimated Wastewater Generation by Proposed Project**

Land Use	Unit/Quantity	Generation Rate (gpd/unit) <sup>a</sup>	Total (gallons/day)
Existing Uses <sup>b</sup>	--	--	524,000
<b>Proposed Project</b>			
Residential <sup>c</sup>	2,995 units	200gal/unit/day	599,000
Office/Commercial	75,000 sf	0.2 gal/sf/day	15,000
Retail	620,000 sf	0.325 gal/sf/day	201,500
Casino/OTB	120,000 sf	0.35 gal/sf/day	42,000
Hotel			
Rooms	300 rooms	125 gal/room/day	37,500
Meeting Space	20,000 sf	0.3 gal/sf/day	6,000
Civic Use <sup>d</sup>	4 AC <sup>e</sup>	20 gal/student/day	16,000
Open Space	25 AC	--	--
		<b>Subtotal</b>	<b>917,000</b>
		<b>Net Total</b>	<b>393,000</b>
<i>Notes:</i>			
<sup>a</sup> Generation Rates based on County Sanitation Districts of Los Angeles County wastewater generation rates. Uses not listed are estimated by the closest type of use available in the table.			
<sup>b</sup> Hall & Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008.			
<sup>c</sup> Based on highest estimated residential generation from EIR Technical Appendix - Hall & Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008. (includes 10,000 sf HOA Facility).			
<sup>d</sup> The proposed Civic Use could consist of a school, library, community center or other civic use. For purposes of impacts to Wastewater, the Civic Use is assumed to be a school, and as such, generation rates for public utilities are based on a school use because it would be the most intensive civic use.			
<sup>e</sup> Based on California Department of Education, 2000, Guide to School Site Analysis and Development. A 4-acre school site could be developed with a 73,600 sf school with 800 students (92 sf/pupil). Source: Christopher A. Joseph & Associates, June 2007.			

### Land Use Equivalency Program

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

Wastewater impacts pertaining to construction activities under the Equivalency Program would be nearly identical to those that would occur under the Proposed Project and would not result in increased wastewater impacts, given the similarity in nature and intensity of construction activities under all development scenarios. As such, construction impacts would be less than significant under the Equivalency Program, as is the case with the Proposed Project.

Operational wastewater generation under the Equivalency Program would vary between the different equivalency scenarios that are identified in Table II-1 in Section II, Project Description. As summarized in Table IV.J-7, below, all three Maximum Housing equivalency scenarios would result in an approximate 8% increase in wastewater generation as compared to the Proposed Project.

**Table IV.J-7**  
**Estimated Wastewater Generation Under the Proposed Equivalency Program**

<b>Development Scenario</b>	<b>Wastewater Generation (gpd)</b>	<b>Over / (Under) Proposed Project</b>	<b>Percent Change From Proposed Project</b>
<b>Proposed Project</b>	917,000	--	--
<b>Equivalency Scenarios</b>			
Maximum Housing 1	991,875	74,875	8.17%
Maximum Housing 2	990,815	73,815	8.05%
Maximum Housing 3	989,875	72,875	7.95%
Maximum Retail	916,075	(925)	-0.10%
Maximum Office/Commercial	910,155	(6,845)	-0.75%
Maximum Hotel	922,375	5,375	0.59%
<i>Source: Christopher A. Joseph &amp; Associates, July 2008 (Equivalency Calculation Worksheets are provided in Appendix I.)</i>			

Wastewater generation under the maximum hotel scenario would increase by approximately 0.59 percent. Wastewater generation under the maximum retail and maximum commercial/office scenarios would decrease by approximately 0.1 and 0.75 percent, respectively. Compared to the proposed project, the fluctuations in wastewater generation under all the equivalency program scenarios would not exceed 9 percent of the projected generation for the proposed project. It should be noted that the wastewater generation rates used to estimate wastewater generation for the proposed project and the land use equivalency program are based on standard sewer design manual rates for the proposed land uses and do not account for any water conservation measures. Therefore these estimates are considered conservative and would be expected to be reduced as a result of the energy and water conservation measures proposed to be implemented under the specific plan. Because the project's wastewater generation estimates are believed to represent a conservative estimate, an increase to the proposed project's generation by 9% could be off-set by implementing one or more of the water conservation strategies as proposed in the specific plan's sustainability checklist. As such the estimated wastewater generation would not be exceeded. In addition, all scenarios under the equivalency program would be subject to the limitations of the county's sewer system. Therefore, wastewater generation impacts under the proposed land use equivalency program would be less than significant.

## **CUMULATIVE IMPACTS**

Implementation of the Proposed Project, including the Land Use Equivalency Program scenarios, in conjunction with the related projects identified in Section III (Related Projects) would further increase demands for sewer service. The Related Projects List provided in Section III includes related projects located throughout the following jurisdictions: City of Inglewood, City of Culver City, City of Hawthorne, City of Los Angeles, and the County of Los Angeles. For purposes of this analysis, it is assumed that all of the jurisdictions above, with the exception of the City of Los Angeles, are served by the JWPCP. Since wastewater generated within the City of Los Angeles would be treated by the Hyperion Treatment Plant, it is not reasonable to include the wastewater generated by those related

projects located within the City of Los Angeles, and therefore, they are not included in this calculation for cumulative wastewater impacts associated with the Proposed Project. As shown in Table IV.J-8, Projected Cumulative Wastewater Generation, the total sewage generation by the related projects located within the City of Inglewood, City of Culver City, City of Hawthorne, and the County of Los Angeles in combination with the Proposed Project is estimated to be approximately 3,262,459 gpd. Sewage generated by the Proposed Project would contribute approximately 12.0 percent of the total cumulative sewage generation created by these related projects. The cumulative sewage generation for the Proposed Project and these related projects would represent approximately 0.6 percent of the JWPCP's daily effluent capacity (550 mgpd), or approximately 1.6 percent of JWPCP's current excess capacity (190 mgpd). These increases would be well within the excess treatment capacity currently available and projected to be available at the JWPCP. Therefore, the Proposed Project in combination with these identified related projects would not require the construction of new wastewater treatment facilities or the expansion of existing wastewater treatment facilities. Therefore, cumulative impacts on wastewater services would be less than significant.

**Table IV.J-8**  
**Projected Cumulative Wastewater Generation**

<b>Related Projects - Grouped by Land Use</b>	<b>Size</b>	<b>Unit</b>	<b>Generation Rate (gpd/unit)<sup>a</sup></b>	<b>Total (gallons/day)</b>
Commercial (Shopping Ctr)	5,017,104	sf	0.325 gal/sf/day	1,630,559
Commercial (Supermarket)	25,506	sf	0.15 gal/sf/day	3,826
Auto/Sales Repair	115,000	sf	0.1 gal/sf/day	11,500
Dwelling Units	3,401	du	200 gal/du/day	680,200
Hotel	320	rm	125 gal/rm/day	40,000
School/Day Care	221,842	sf	0.2 gal/sf/day	44,368
Church	5,983	sf	0.05 gal/sf/day	299
Office	1,270,562	sf	0.2 gal/sf/day	254,112
Warehouse	15,774	sf	0.025 gal/sf/day	394
Service Shop	3,314	sf	0.1 gal/sf/day	331
Mortuary	17,232	sf	0.1 gal/sf/day	1,723
Professional Building	562,156	sf	0.3 gal/sf/day	168,647
Restaurant	11,300	sf	1 gal/sf/day	11,300
Health Spa/Gym	37,000	sf	0.6 gal/sf/day	22,200
<b>Related Projects Total</b>				<b>869,459</b>
<b>Proposed Project Net Total</b>				<b>393,000</b>
<b>Cumulative Total</b>				<b>262,459</b>
<b>Proposed Project Percent of Total</b>				<b>12.0 %</b>
<sup>a</sup> Hall & Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008. Uses are estimated by the closest type of use available in the table. Source: Christopher A. Joseph & Associates, August 2008.				

## PROJECT DESIGN FEATURES

PDF's to implement energy and water conservation measures in accordance with the Sustainability Checklist contained in the Hollywood Park Specific Plan are identified in Section IV.B, Air Quality.

## **MITIGATION MEASURES**

No mitigation measures are required.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

The Proposed Project would result in a less than significant impact upon regional wastewater treatment capacity and infrastructure conveyance.

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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**J. PUBLIC UTILITIES**  
**3. ENERGY CONSERVATION**

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**ENVIRONMENTAL SETTING**

**Electricity**

Southern California Edison (SCE) provides electricity service to the City of Inglewood. SCE obtains electricity from various generating sources that utilize coal, nuclear, natural gas, hydroelectric, and renewable resources to generate power. Major power generating sources for SCE include the following: San Onofre Nuclear Generating Station (SONGS), Big Creek Hydro System, and the Mohave Generation Station in Laughlin, Nevada.<sup>26</sup>

As of 2005, the state of California produces approximately 78 percent of the electricity it uses. The remaining 22 percent is purchased through suppliers from the Desert Southwest (15%) and the Pacific Northwest (7%). Thirty-eight percent of the state's electrical energy is generated by natural gas. Additional electricity is generated through other means including hydro-power (17%), nuclear (14%), coal (20%), and renewable sources including solar, wind, and geothermal (11%).<sup>27</sup>

*Regulatory Framework*

Energy consumption by new buildings in California is regulated by the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations (CCR). The efficiency standards apply to new construction of both residential and non-residential buildings and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings provided that these standards meet or exceed those provided in Title 24 guidelines.

*Existing Infrastructure*

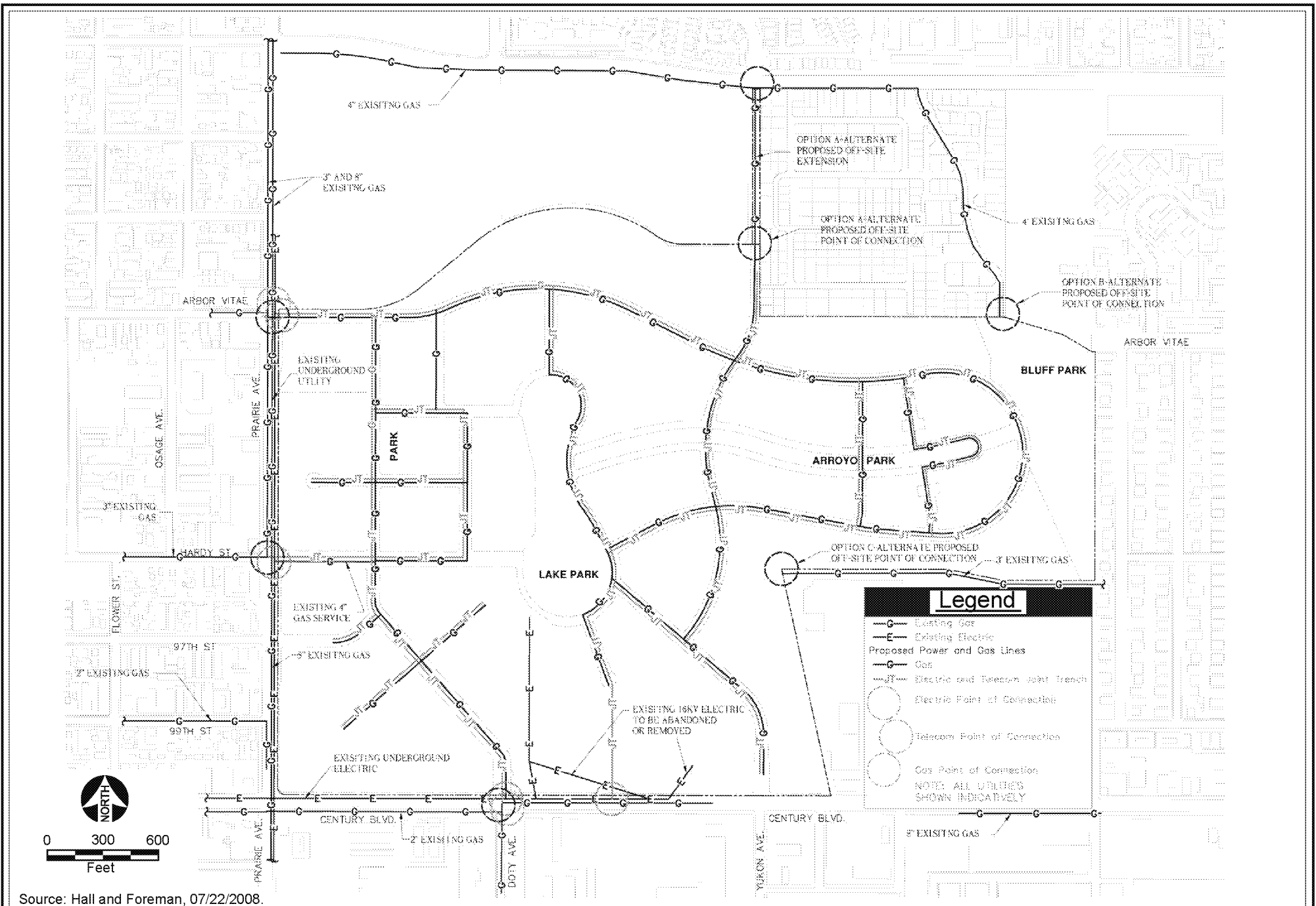
The Proposed Project is located within a developed, urbanized area where facilities currently exist to serve the Project Site and surrounding areas. As shown in Figure IV.J-3, the project site is currently served by a network of electrical infrastructure.

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<sup>26</sup> Southern California Edison: *Generating Facilities*, website: <http://www.sce.com/PowerandEnvironment/PowerGeneration>, accessed October 4, 2006.

<sup>27</sup> California Energy Commission website: <http://energy.ca.gov/html/energysources.html>, accessed October 4, 2006.





Source: Hall and Foreman, 07/22/2008.



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Figure IV.J-3  
Existing and Proposed Electricity, Natural Gas  
and Telecom Infrastructure

Electricity to the Grandstand, Casino, and Pavilion is supplied from a single 2,000 amp, 4,160-volt service located in the Pavilion/Casino central plant building. The barn areas are served with 4,160 volts, which forms a separate feed from the utility. An electrical room located in the Pavilion has two unit substations, with three vaults providing service to the parking lot and track lighting. The casino has a preferred emergency (PE) service as part of an added facilities agreement with SCE. This is an extra level of service provided by SCE as spare capacity has to be reserved within the sub-station to provide a back-up supply.<sup>28</sup> Existing electrical and natural gas infrastructure servicing the Project Site is listed in Table IV.J-9, below. The existing commercial uses consume approximately 26,010,004 kilowatt hours (kWh) of electricity per year, and has 6 megavolt amperes (MVA) of peak electricity demand plus the existing on-site infrastructure has a 9-MVA available supply capacity.<sup>29</sup> There are no current deficiencies in electrical service in the vicinity of the Project Site.<sup>30</sup>

**Table IV.J-9**  
**Existing Electrical and Natural Gas Infrastructure**

Location	Size	Notes
<b>Electricity</b>		
Prairie Avenue	N/A	
Century Boulevard	2x16kV feeds near to Doty Avenue 1x16kV feed near to Yukon Avenue	Below ground cable routes Lennox Sub-station, Boeing and Ryan circuits
W. 90 <sup>th</sup> St/Pincay	N/A	
Other	N/A	
<b>Natural Gas</b>		
Prairie Avenue	2," 3," 8," mainlines	Existing 4" service to Hollywood Park site at Hardy Street
Century Boulevard	2" main west of Yukon Ave, 3" main East of Club Drive	
W. 90 <sup>th</sup> St/Pincay	4" mainline	
Other	3" service just south of panhandle boundary line between Hollywood Park and existing retail site 4" mainline end capped north of panhandle from Renaissance development cul-de-sac	
<i>Source: Hall &amp; Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008.</i>		

<sup>28</sup> Hall & Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008.

<sup>29</sup> Hall & Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008.

<sup>30</sup> Hall & Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008.

## Natural Gas

As of 2005, the state of California produced approximately 15 percent of the natural gas it uses. The remaining 85 percent is obtained from sources outside of the state: 38 percent from the Southwest, 23 percent from Canada, and 24 percent from the Rocky Mountain area.<sup>31</sup> Since 2001, 11 new interstate gas pipelines have been built to serve California, expanding the over one million miles of existing pipelines. Ten additional interstate pipelines are currently proposed or under construction.<sup>32</sup> However, the availability of natural gas is based upon changing conditions of gas supply and regulatory policies.

The Southern California Gas Company (SCG) provides natural gas to the City of Inglewood through existing gas mains located under the streets and public right-of-ways. Natural gas service is provided in accordance with the Gas Company's policies and extension rules on file with the California Public Utilities Commission (PUC) at the time contractual agreements are made. As a public utility, SCG is under the jurisdiction of the PUC, but can also be affected by the actions of federal regulatory agencies.

### *Existing Infrastructure*

Metered natural gas service is provided to the Project Site and is sub-metered at the grandstand.<sup>33</sup> The locations of the existing local natural gas mains serving the Project Site and surrounding area are listed in Table IV.J-9, above, and are depicted in Figure IV.J-3, Existing and Proposed Electricity and Natural Gas Infrastructure. The uses currently occupying the Project Site consume approximately 37,470 cubic feet of natural gas per month.

## ENVIRONMENTAL IMPACT

### Thresholds of Significance

In accordance with Appendix G (Energy Conservation) of the State CEQA Guidelines, the discussion of a project's impacts may include the following:

- (a) The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project's life cycle including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.

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<sup>31</sup> California Energy Commission, *California's Major Sources of Energy*, website: <http://www.energy.ca.gov/html/energysources.html>, accessed October 4, 2006.

<sup>32</sup> California Energy Commission, *Natural Gas in California*, website: <http://www.energy.ca.gov/naturalgas/index.html>, accessed October 4, 2006.

<sup>33</sup> Hall & Foreman, Inc., *Hollywood Park Project, Utilities and Infrastructure Technical Report*, August 29, 2008.

- (b) The effects of the project on local and regional energy supplies and on requirements for additional capacity.
- (c) The effects of the project on peak and base period demands for electricity and other forms of energy.
- (d) The degree to which the project complies with existing energy standards.
- (e) The effects of the project on energy resources.
- (f) The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

## **Project Impacts**

### *Construction*

Energy would be consumed during the demolition, excavation, and construction phases of the Proposed Project for grading and materials transfer by heavy-duty equipment, which is usually diesel powered. Although exact figures cannot be determined until building permits are issued, it is currently expected that the heavy equipment involved in the demolition, excavation, and construction phases of the Project would include crawler-excavators, loaders, bulldozers, graders, water trucks, street sweepers, tractors, cranes, and fork lifts. Construction equipment would use a combination of energy sources, including diesel fuel, gasoline, electricity and natural gas. The electricity and natural gas demands generated during the construction phase would be accommodated by the existing utility providers and impacts would be less than significant.

### *Operation - Electricity*

Existing electrical distribution facilities within the project area would be used to serve the Project Site from the Lennox sub-station. As shown in Figure IV.J-3, the site would tie into existing primary lines running along Century Boulevard and Prairie Avenue. New on-site routes would be designed by SCE. New on-site primary electrical infrastructure would likely include underground routes comprising vaults, conduits, switching features, and transformers which would be installed throughout the project site to service the proposed lots. This will be installed under the roadways in the public right of way. The on-site network would be operated and maintained by SCE. The proposed infrastructure improvements associated with upgrading and installing electrical infrastructure would involve localized trenching and would not result in any adverse impacts.

Development of the Proposed Project would increase the existing demand for electricity service in the project area. The Proposed Project would continue to be served from the existing power grid. As shown in Table IV.J-10, the estimated net increase in electricity consumption by the Proposed Project is approximately 6,836,844 kW-hr/per year. A will serve letter has been received from SCE to provide

electrical service. The electrical loads of the project are within parameters of projected load growth which SCE is planning to meet in the project area.<sup>34</sup>

Table IV.J-10 includes estimated electricity consumption for the existing uses based on actual usage from the existing site, as provided by the project applicant.

**Table IV.J-10**  
**Estimated Electricity Consumption by Proposed Project**

Land Use	Unit/Quantity	Generation Rate <sup>a</sup>	Total (KW-hr/year)
Existing Uses <sup>b</sup>	--		26,010,004
<b>Proposed Project</b>			
Residential	2,995 units	5,626.50 KW-Hr/unit	16,851,368
HOA Facility	10,000 sf	10.5 KW-Hr/sf/yr	105,000
Office/Commercial	75,000 sf	12.95 KW-Hr/sf/yr	971,250
Retail	620,000 sf	13.55 KW-Hr/sf/yr	8,401,000
Casino/OTB	120,000 sf	19.23 KW-Hr/sf/yr <sup>c</sup>	2,307,930
Hotel			
300 Rooms <sup>d</sup>	210,000 sf	9.95 KW-Hr/sf/yr	2,089,500
Meeting Space	20,000 sf	12.95 KW-Hr/sf/yr	259,000
Civic Use <sup>e</sup>	4 AC <sup>f</sup>	10.5 KW-Hr/sf/yr	772,800
Open Space	25 AC	1 KW-Hr/sf/yr	1,089,000
<b>Subtotal</b>			<b>32,846,848</b>
<b>Net Total</b>			<b>6,836,844</b>
<sup>a</sup> Rates based on SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993, unless footnoted otherwise. <sup>b</sup> Hollywood Park Land Company, June 8, 2007. <sup>c</sup> The electricity generation rate was based on existing electricity demands for the casino as provided by the Hollywood Park Land Company. <sup>d</sup> Hotel use based on 700 square feet per room. <sup>e</sup> The proposed Civic Use could consist of a school, library, community center or other civic use. For purposes of this EIR, generation rates for public utilities are based on a school use because it would be the most intensive civic use. <sup>f</sup> Based on California Department of Education, 2000, Guide to School Site Analysis and Development. A 4-acre school site could be developed with a 73,600 sf school with 800 students (92 sf/pupil). Source: Christopher A. Joseph & Associates, July 2007.			

Also, the generation rates for the Proposed Project are based on standard generation rates for the various proposed uses, as discussed in the Hollywood Park Utilities and Infrastructure Technical Report, Hall & Foreman, Inc., August 29, 2008. Because generation rates for Casino uses are not well established or standardized, the generation rate included in the following chart for the proposed Casino/OTB facility is

<sup>34</sup> Hall & Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008.

based on actual current use at the existing Casino/Pavilion facility. The existing Casino/Pavilion uses approximately 30% of the electricity consumed by all of the existing uses at the project site. This 30% usage by the Casino/Pavilion was established by comparing the average energy usage for the project site from 1989-1994 (the 5 years prior to the commencement of the Casino use) to the incremental increase in usage in 1994 (the year the Casino use commenced). In 1994 the incremental increase in energy usage was 42% thus demonstrating that the Casino used approximately 30% of the electricity consumed by the overall site. From 1994 to the present time, the Casino has been charged for 30% of the overall electricity consumed by the existing site. Thus, based on this historical calculation as well as continuing billing practices, the 30% creates a reasonable foundation to establish the electrical consumption of the existing Casino use.

The generation rate in the table above, based on the existing Casino usage of 30% of the overall consumption of the existing site, is established as follows. The existing uses at the project site consumed approximately 26,010,004 KW-hr during the 2006 calendar year. Thirty percent of 26,010,004 equals 7,693,100 KW-hr per year. Thus, for the 2006 calendar year the existing Casino used approximately 7,693,100 KW-hr per year, which when divided by the square footage of the existing Casino/Pavilion (400,000 square feet) equals a generation rate of approximately 19.23 KW-hr per square foot of Casino use. Thus, the calculations in the table below uses this 19.23 KW-hr per square foot generation rate for the proposed 120,000 square foot Casino/OTB facility, resulting in an estimated electricity consumption for the proposed 120,000 Casino/OTB facility in the amount of 2,307,930 KW-hr per year (19.23 times 120,000 square feet).

The proposed electricity demand from the operation of uses under the Proposed Project are within the anticipated service capabilities of SCE. Current transmission and distribution facilities for electricity are adequate to meet the demands of the Proposed Project, though if any facilities improvements were necessary to meet future demand, SCE is prepared to provide these at that time (see SCE will-serve letter in Appendix A-3). The operation of the Proposed Project would not result in an increase in demand for energy that exceeds available supply or distribution infrastructure capabilities; hence, no significant impacts are expected.

Furthermore, the electricity demand estimates presented above for the Proposed Project at buildout are based on consumption factors presented in the 1993 SCAQMD CEQA Air Quality Handbook, which do not take into account the energy conservation measures that are described in the Project Design Features. As such, the design of the Proposed Project incorporates energy conservation measures that meet or exceed state Title 24 energy conservation standards; hence, the Proposed project would have less than significant impacts on energy consumption.

#### *Operation - Natural Gas*

Existing gas facilities within the project area would be used to serve the project site. The site would tie into existing primary lines running along Prairie Avenue and W. 90<sup>th</sup> Street. New on-site routes would be designed by Southern California Gas Company. This will be installed under the roadways in the public right of way. The on-site network would be operated and maintained by Southern California Gas

Company. The Proposed Project would increase demands for natural gas service in the Project area. As shown in Table IV.J-11 below, the Proposed Project's net natural gas demands are estimated to be approximately 19.9 million cf per month.

Since the Proposed Project is located in an area already served by existing natural gas infrastructure, the Project would not require extensive infrastructure improvement to serve the Project Site. Impacts associated with utility upgrades or additional connections would be temporary in nature and thus result in less than significant impacts upon the environment. A will serve letter has been received from Southern California Gas Company to provide gas service. Gas service to the project could be served without any significant impact on the environment.<sup>35</sup> Impacts associated with natural gas resources would therefore be less than significant.

**Table IV.J-11  
Estimated Natural Gas Consumption by Proposed Project**

Land Use	Unit/Quantity	Consumption Rate <sup>a</sup>	Total (cf/month)
Existing Uses <sup>b</sup>	--	--	3,894,900
<b>Proposed Project</b>			
Residential	2,995 units	6,665 cf/du/month	19,961,675
HOA Facility	10,000 sf	2 cf/sf/month	20,000
Office/Commercial	75,000 sf	2 cf/sf/month	150,000
Retail	620,000 sf	3 cf/sf/month	1,860,000
Casino/OTB	120,000 sf	4.80cf/sf/month	576,000
Hotel			
Rooms-300 Rooms <sup>c</sup>	210,000 sf	5 cf/sf/month	1,050,000
Meeting Space	20,000 sf	2 cf/sf/month	40,000
Civic Use <sup>d</sup>	4 AC <sup>e</sup>	2 cf/sf/month	147,200
Open Space	25 AC	--	--
		<b>Subtotal</b>	<b>23,804,875</b>
		<b>Net Total</b>	<b>19,909,975</b>
<sup>a</sup> Rates based on SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993, unless footnoted otherwise. <sup>b</sup> Hollywood Park Land Company, June 8, 2007. <sup>c</sup> Hotel use based on 700 square feet per room. <sup>d</sup> The proposed Civic Use could consist of a school, library, community center or other civic use. For purposes of this EIR, generation rates for public utilities are based on a school use because it would be the most intensive civic use. <sup>e</sup> Based on California Department of Education, 2000, Guide to School Site Analysis and Development. A 4-acre school site could be developed with a 73,600 sf school with 800 students (92 sf/pupil). Source: Christopher A. Joseph & Associates, July 2007.			

<sup>35</sup> Hall & Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008.

### **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 preceding energy analysis addressed impacts associated with construction and operation of the Proposed Project relative to projected energy consumption, as well as the adequacy of electricity and natural gas supplies and distribution infrastructure. The proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

Energy impacts pertaining to construction activities under the Equivalency Program would be similar to that which is projected to occur under the Proposed Project and would not result in increased electricity and natural gas consumption impacts, given the similarity in nature and intensity of construction activities under all development scenarios. Furthermore, operational impacts to distribution infrastructure under the Equivalency Program would be similar to the Proposed Project, as coordination with affected utilities (i.e., SCE and LADWP) for design and planning of electricity and natural gas distribution infrastructure under the Equivalency Program (i.e. to ensure system adequacy) would still occur. As such, construction impacts, as well as operational impacts related to distribution infrastructure, would be less than significant under the Equivalency Program, as is the case with the Proposed Project, since, with coordination with the utility providers, the total estimated energy demand for construction activities would not exceed available energy supplies, and operation of proposed uses would not exceed the capacity of distribution infrastructure.

Operational electricity and natural gas consumption under the Equivalency Program, as shown below in Tables IV.J-12 and IV.J-13 would result in an increase in energy consumption for Maximum Housing 1, 2 and 3. The Maximum Retail scenario would result in a slight decrease in natural gas consumption and electricity use. The Maximum Office/Commercial scenario would result in a decrease in natural gas consumption and a slight increase in electricity use. The Maximum Hotel scenario would result in a slight increase in both natural gas and electricity use. It should be noted that the energy demands used to estimate electricity and natural gas demands for the Proposed Project and the Equivalency Program are based on standard rates for the proposed land uses and do not account for any energy conservation measures. Therefore these estimates are considered conservative and would be expected to be reduced as a result of the energy conservation measures proposed to be implemented under the Specific Plan. Overall, compared to the Proposed Project, the fluctuations in electricity and natural gas consumption under all development scenarios of the Land Use Equivalency Program are equal to or less than 13 percent, the impacts relative to the Proposed Project are not substantial. Therefore, impacts under the Land Use Equivalency Program, as is the case with the Proposed Project, would be less than significant.



**Table IV.J-12**  
**Electricity Demands Under the Proposed Land Use Equivalency Program**

Development Scenario	Net Energy Demands (KW-hr/Year)	Over (Under) Proposed Project (KW-hr/year)	Net Impact Compared to Proposed Project
<b>Proposed Project</b>	32,846,848	--	--
<b>Equivalency Scenarios</b>			
Maximum Housing 1	34,392,220	1,545,372	4.7
Maximum Housing 2	34,263,860	1,417,012	4.31
Maximum Housing 3	34,316,900	1,470,052	4.48
Maximum Retail	32,517,318	329,531	-1.0
Maximum Office/Commercial	32,853,398	6,550	0.02
Maximum Hotel	33,306,018	459,170	1.40

*Source: Christopher A. Joseph & Associates, July 2008 (Equivalency Calculation Worksheets are provided in Appendix I.)*

**Table IV.J-13**  
**Natural Gas Demands Under the Proposed Land Use Equivalency Program**

Development Scenario	Energy Demands (cf/month)	Over (Under) Proposed Project (cf/month)	Percent Change From Proposed Project
<b>Proposed Project</b>	23,804,875	--	--
<b>Equivalency Scenarios</b>			
Maximum Housing 1	26,803,700	2,998,825	12.6%
Maximum Housing 2	26,681,300	2,876,425	12.1%
Maximum Housing 3	26,675,700	2,870,825	12.1%
Maximum Retail	23,557,875	(247,000)	-1.04%
Maximum Office/Commercial	23,522,675	(282,200)	-1.19%
Maximum Hotel	24,319,875	515,000	2.16%

*Source: Christopher A. Joseph & Associates, July 2008 (Equivalency Calculation Worksheets are provided in Appendix I.)*

## CUMULATIVE IMPACTS

### Electricity

Implementation of the Proposed Project, as with the Land Use Equivalency Program, in conjunction with the related projects identified in Section III (Related Projects) would further increase demands for electricity. The Related Projects List provided in Section III includes related projects located throughout the following jurisdictions: City of Inglewood, City of Culver City, City of Hawthorne, City of Los

Angeles, and the County of Los Angeles. For purposes of this analysis, it is assumed that all of the jurisdictions above, with the exception of the City of Los Angeles, are served by the SCE. Since electricity demands generated within the City of Los Angeles would be served by the LADWP, it is not reasonable to include the electricity demands generated by those related projects located within the City of Los Angeles, and therefore, they are not included in this calculation for cumulative electricity demand impacts associated with the Proposed Project. As shown in Table IV.J-14, Projected Cumulative Electricity Consumption, the total consumption by the related projects located within the City of Inglewood, City of Culver City, City of Hawthorne, and the County of Los Angeles in combination with the Proposed Project is estimated to be approximately 125,006,565 kilowatts per year. Electricity consumed by the Proposed Project would contribute approximately 5.5 percent of the total electricity consumption by these related projects.

**Table IV.J-14**  
**Projected Cumulative Electricity Consumption**

<b>Related Projects - Grouped by Land Use</b>	<b>Size</b>	<b>Unit</b>	<b>Consumption Rate (kilowatt hours/unit/year)<sup>a</sup></b>	<b>Total (KW-Hr/Year)</b>
Retail	5,131,668	sf	13.55	69,534,101
Grocery Store	25,506	sf	53.30	1,359,470
Dwelling Units	3,401	du	5,626.50	19,135,727
Hotel	222,875	sf	9.95	2,217,606
School/Day Care	221,842	sf	10.5	2,329,341
Miscellaneous	622,371	sf	10.5	6,534,896
Office	1,270,562	sf	12.95	16,453,778
Warehouse	15,774	sf	4.35	68,617
Restaurant	11,300	sf	47.45	536,185
<b>Related Projects Total</b>				<b>118,169,721</b>
<b>Proposed Project Net Total</b>				<b>6,836,844</b>
<b>Cumulative Total</b>				<b>125,006,565</b>
<b>Proposed Project Percent of Total</b>				<b>5.5%</b>
<sup>a</sup> Utility rates provided by SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993. Source: Christopher A. Joseph & Associates, July 2007.				

The cumulative effects of the Proposed Project in combination with related projects may require SCE to construct additional distribution facilities in the near future. It is impossible to determine the infrastructure specifically required given the uncertainty of the timeframe for implementing the related projects. In accordance with current building codes and construction standards, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code. Compliance with Title 24 energy conservation standards and other energy conservation programs on the local level will be similarly imposed and would further reduce cumulative energy demands. Cumulative impacts to electricity service would therefore be less than significant.

## Natural Gas

Implementation of the Proposed Project in conjunction with the related projects identified in Section III (Related Projects) would further increase demands for natural gas. The Related Projects List provided in Section III includes related projects located throughout the following jurisdictions: City of Inglewood, City of Culver City, City of Hawthorne, City of Los Angeles, and the County of Los Angeles. For purposes of this analysis, it is assumed that all of the jurisdictions above are served by the SCG. As shown in Table IV.J-15, Projected Cumulative Natural Gas Consumption, the total consumption by the related projects in combination with the Proposed Project is estimated to be approximately 106,061,866 cf per month. Natural Gas consumed by the Proposed Project would contribute approximately 19 percent of the total consumption by these related projects. As a public utility provider, the SCG continuously analyzes increases in natural gas demands resulting from projected population and employment growth in its service area. Compliance with energy conservation standards pursuant to Title 24 of the California Administrative Code would reduce cumulative demands for natural gas resources. Each of the related projects would be reviewed on a case-by-case basis to determine the Gas Company's ability to serve each project. Cumulative impacts upon natural gas resources and infrastructure would therefore be less than significant.

**Table IV.J-15**  
**Projected Cumulative Natural Gas Consumption**

Related Projects - Grouped by Land Use	Size	Unit	Consumption Rate (cf/unit/month) <sup>a</sup>	Total (cf/month)
Retail	7,449,048	sf	3	22,347,144
Dwelling Units	7,726	du	6,665	51,493,790
Hotel	644,227	sf	5	3,221,135
Office	4,544,911	sf	2	9,089,822
<b>Related Projects Total</b>				<b>86,151,891</b>
<b>Proposed Project Net Total</b>				<b>19,909,975</b>
<b>Cumulative Total</b>				<b>106,061,866</b>
<b>Proposed Project Percent of Total</b>				<b>19%</b>
<sup>a</sup> Utility rates provided by SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993. Source: Christopher A. Joseph & Associates, July 2008.				

## PROJECT DESIGN FEATURES

PDF's to implement energy conservation measures in accordance with the Sustainability Checklist contained in the Hollywood Park Specific Plan are identified in Section IV.B, Air Quality.

## MITIGATION MEASURES

No mitigation measures are required.

## LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts upon electricity and natural gas services would be less than significant.

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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**J. PUBLIC UTILITIES**  
**4. SOLID WASTE**

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**ENVIRONMENTAL SETTING**

Solid waste management is provided to the City of Inglewood by Waste Management. The Refuse Division of the City General Services Department collects refuse from the majority of single-family homes and some multi-family complexes, commercial and industrial sectors within the City. The primary facilities that currently serve the City are the City of Inglewood Transfer Station and the Carson Transfer Station, which transfer solid waste to the Puente Hills Landfill in Whittier and the El Sobrante Landfill located in Riverside County, California.<sup>36</sup>

The Puente Hills Landfill, located in Whittier, is permitted to accept up to 24,000 cubic yards (13,200 tons) per day, six days per week, and is permitted to operate through the year 2013. The Puente Hills Landfill has a total of approximately 66 million cubic yards (36.3 million tons) of capacity, which at the maximum permitted daily capacity equates to an estimated nine years remaining life. In 2004 the average daily waste quantities disposed of were 22,345 cubic yards (12,290 tons).<sup>37</sup>

The El Sobrante Landfill is located in western Riverside County, and currently has 495 acres permitted for disposal activities with more than 165 million cubic yards (90.75 million tons) of remaining capacity. The El Sobrante Landfill can accept up to 10,000 tons per day of waste from the counties of Riverside, Los Angeles, Orange, San Diego, and San Bernardino, and currently has 25,000 tons of weekly capacity available.<sup>38</sup>

Waste disposal sites or landfills are operated by the County of Los Angeles (County), as well as by private companies. In addition, transfer stations are utilized to temporarily store debris until larger hauling trucks are available to transport the materials directly to the landfills. Landfill availability is limited by several factors, including: (1) restrictions to accepting waste generated only within a landfill's particular jurisdiction and/or watershed boundary; (2) tonnage permit limitations; and (3) operational constraints.

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<sup>36</sup> *City of Inglewood General Plan Update Technical Background Report, 3.4-1.*

<sup>37</sup> *Los Angeles County Department of Public Works, Los Angeles County Integrated Waste Management Plan 2004 Annual Update, February 2006.*

<sup>38</sup> *City of Inglewood General Plan Update Technical Background Report, 3.4-3.*

## Regulatory Framework

The California Integrated Waste Management Act of 1989 (AB 939) was enacted to reduce, recycle, and reuse solid waste generated in the State to the maximum extent feasible. Specifically, the Act requires city and county jurisdictions to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by the year 2000. The Act also requires each city and county to promote source reduction, recycling, and safe disposal or transformation. Cities and counties are required to maintain the 50 percent diversion specified by AB 939 past the year 2000. The Act also requires each city and county to promote source reduction, recycling, and safe disposal or transformation.

AB 939 further requires each city to conduct a Solid Waste Generation Study and to prepare a Source Reduction and Recycling Element (SRRE) to describe how it would reach the goals. The SRRE contains programs and policies for fulfillment of the goals of the Act, including the above-noted diversion goals and must be updated annually to account for changing market and infrastructure conditions. As projects and programs are implemented, the characteristics of the waste stream, the capacities of the current solid waste disposal facilities, and the operational status of those facilities are upgraded, as appropriate. California cities and counties are required to submit annual reports to the CIWMB to update it on their progress toward the AB 939 goals. To date, implementation of AB 939 has proven to be a successful method of reducing landfill waste in the City. The City of Inglewood's AB 939 diversion rate is currently approximately 44%.<sup>39</sup>

Furthermore, facility expansions and new landfills are continuously being sought as existing facility capacity diminishes. Details related to construction- and operation-related solid waste impacts are discussed, below.

## ENVIRONMENTAL IMPACT

### Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, a significant impact to solid waste services would normally occur if:

- (a) The landfill serving the Proposed Project did not have sufficient permitted capacity to accommodate the project's solid waste disposal needs;
- (b) The Proposed Project would not comply with federal, state and local statutes and regulations related to solid waste.

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<sup>39</sup> City of Inglewood, *Public Works: Waste Collection*, website: [http://cityofinglewood.org/depts/pw/divisions/public\\_services/waste\\_collection.asp](http://cityofinglewood.org/depts/pw/divisions/public_services/waste_collection.asp), October 3, 2006.

## Impacts Determined to be Less Than Significant

With respect to CEQA Checklist Question (b), above, the construction and operation of the Proposed Project would be required to adhere to all applicable federal, State, and local statutes and regulations related to solid waste. No impacts would occur associated with compliance with the federal, State, or local statutes and regulations related to solid waste and no further analysis is warranted.

### Project Impacts

#### Construction

Construction of the Proposed Project will generate demolition and construction debris that will need to be disposed of at area landfills and/or recycled. Construction and demolition debris includes concrete, asphalt, wood, drywall, metals, and a variety of other miscellaneous and composite materials. Based on national averages for residential and commercial projects, construction of the Proposed Project is estimated to generate approximately 80,595 tons of construction and demolition debris (see Table IV.J-16, Estimated Construction and Demolition Debris, below).

**Table IV.J-16  
Estimated Construction and Demolition Debris**

Construction Activity	Size (sf)	Rate (lbs./sf) <sup>a</sup>	Generated Waste (tons/sf)
<b>Demolition-Existing Uses</b>			
Main Building/Grandstand	594,000	155	46,035
Casino/Pavilion	280,000 <sup>b</sup>	155	21,700
		<b>Subtotal</b>	<b>67,735</b>
<b>Construction-Proposed Project</b>			
Residential <sup>c</sup>	2,995 units	4.38	9,839
HOA Facility	10,000 sf	3.89	19
Office/Commercial	75,000 sf	3.89	146
Retail	620,000 sf	3.89	1,206
Casino/OTB	120,000 sf	17.67 <sup>e</sup>	1,060
Hotel			
Rooms	300 rooms <sup>d</sup>	3.89	408
Meeting Space	20,000 sf	3.89	39
Civic Use <sup>e</sup>	4 AC <sup>f</sup>	3.89	143
Open Space	25 acres	N/A	-
		<b>Subtotal</b>	<b>12,860</b>
		<b>Total</b>	<b>80,595</b>

<sup>a</sup> Generation rates for demolition, construction and renovation are derived from the *Characterization of Building-Related Construction and Demolition Debris in the United States*, U.S.E.P.A., Report No. EPA530-R-98-101, June 1998.

<sup>b</sup> The total area of the Casino Pavilion that is estimated to be demolished is based on 400,000 sf of floor area minus 120,000 sf that is proposed to be renovated.

<sup>c</sup> Assumes an average of 1,500 sf per dwelling unit.

<sup>d</sup> Based on an average of 700 sf per hotel room.

<sup>e</sup> The proposed Civic Use could consist of a school, library, community center or other civic use. For purposes of this EIR, generation rates for public utilities are based on a school use because it would be the most intensive civic use.

<sup>f</sup> Based on California Department of Education, 2000, *Guide to School Site Analysis and Development*. A 4-acre school site could be developed with a 73,600 sf school with 800 students (92 sf/pupil).

<sup>g</sup> Based on renovation rate provided in *Characterization of Building-Related Construction and Demolition Debris in the United States*, U.S. E.P.A., June, 1998.

Source: Christopher A. Joseph & Associates, July 2008.

Construction and demolition debris would be generated over several phases of development, which are anticipated to be complete in 2014. The Proposed Project would implement an on-site recycling program that would include crushing and recycling asphalt and concrete materials on-site to the maximum extent feasible. The Puente Hills and El Sobrante Landfills would likely be the primary disposal and recycling site used for demolition and construction debris. The combined remaining landfill capacity at the Puente Hills and El Sobrante Landfills is in excess of 200 million tons. Construction of the Proposed Project is anticipated to generate approximately 80,595 tons of solid waste, representing approximately .04 percent of the total available landfill capacity. Therefore construction related solid waste could be accommodated by existing landfills and impacts would be less than significant.

### **Operational Impacts**

With respect to threshold (a), operation of the Proposed Project would cause an on-going generation of solid waste throughout the lifespan of the Project. Upon full occupancy, the Proposed Project's residential and commercial uses would generate approximately 12,461 net pounds (6.2 tons) of solid waste per day, or approximately 2,263 tons per year (see Table IV.J-17, Estimated Operational Solid Waste Generation by Proposed Project, below).

**Table IV.J-17  
Estimated Operational Solid Waste Generation by Proposed Project**

<b>Land Use</b>	<b>Unit/Quantity</b>	<b>Generation Rate<sup>a</sup> (lbs/unit/day)</b>	<b>Total (Pounds/Day)</b>
<b>Existing Uses</b>			
Main Building/Grandstand	594,000	.006	3,564
Pavilion <sup>b</sup>	280,000	.005	1,400
		<b>Subtotal</b>	<b>4,964</b>
<b>Proposed Project</b>			
Residential	2,995 units	4.00 lbs/unit/day	11,980
HOA Facility	10,000 sf	0.006 lbs/sf/day	60
Office/Commercial	75,000 sf	0.006 lbs/sf/day	450
Retail	620,000 sf	0.005 lbs/sf/day	3,100
Casino/OTB	120,000 sf	0.005 lbs/sf/day	600
Hotel			
Rooms	300 rooms	2.0 lbs/room/day	600
Meeting Space	20,000 sf	0.006 lbs/sf/day	120
Civic Use <sup>c</sup>	4 AC	0.007 lbs/sf/day	515
Open Space	25 AC	--	--
		<b>Subtotal</b>	<b>17,425</b>
		<b>Net Total</b>	<b>12,461</b>
<sup>a</sup> Generation Rates based on City of Los Angeles Department of Public Works, Bureau of Sanitation Solid Waste Generation, 1981. Uses not listed are estimated by the closest type of use available in the table. <sup>b</sup> Does not include the Pavilion outdoor seating area which has been abandoned and is not in use. <sup>c</sup> Based on California Department of Education, 2000, Guide to School Site Analysis and Development. A 4-acre school site could be developed with a 73,600 sf school with 800 students (92 sf/pupil). Source: Christopher A. Joseph & Associates, July 2007.			

All solid waste generating activities within the City of Inglewood, which includes the Proposed Project, are subject to the requirements set forth in AB 939. Therefore, it is anticipated that the Proposed Project would divert 50 percent of its solid waste through on-site recycling efforts (see PFDs IV.J-4.1 and IV.J-4.2, below). Nonetheless, while the Puente Hills and El Sobrante Landfills have adequate capacity to serve the Proposed Project upon project buildout in 2014, there is some data that suggests that there is insufficient permitted disposal capacity within the region to provide for long term disposal needs. Because the Proposed Project would generate additional solid waste throughout the life of the project and beyond the expected life of the landfills serving the Project Site, operational solid waste impacts would be considered significant and unavoidable.

### **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.

Solid waste impacts pertaining to construction activities under the Equivalency Program would be nearly identical to the Proposed Project and would not result in a substantial increase in solid waste impacts, given the similarity in nature and intensity of construction activities under all development scenarios. Furthermore, operational impacts to collection routes under the Equivalency Program would be similar to the Proposed Project, as the Land Use Equivalency Program would have a similar need for solid waste collection routes.

Under the Equivalency Program, as with the Proposed Project, all solid-waste-generating activities within the City of Inglewood are subject to the requirements of AB 939. Therefore, it is anticipated that, as with the Proposed Project, the Equivalency Program would divert 50 percent of its solid waste through on-site recycling efforts. As with the Proposed Project, it is anticipated that subsequent to buildout in 2014 there will be insufficient permitted disposal capacity within the region to provide for long term disposal needs, and as such solid waste impacts, under the Land Use Equivalency Program as with the Proposed Project, would be considered significant and unavoidable.

As shown in Table IV.J-18, below, as compared to the Proposed Project, the fluctuations in solid waste generation under all the Equivalency Program scenarios are equal to or less than 13 percent. The amount of daily solid waste would increase by approximately 8 to 9 percent under the Maximum Housing Alternatives. The amount of solid waste generation under the Maximum Retail, Maximum Office/Commercial, and Maximum Hotel scenarios would be negligible as compared to the amount of solid waste estimated to be generated by the Proposed Project. As with the Proposed Project, all Project Design Features and Mitigation Measures would be applied under the Land Use Equivalency Program. However, the impacts associated with solid waste generation under the Proposed Project, including the Land Use Equivalency Program, would be significant and unavoidable.



**Table IV.J-18**  
**Estimated Solid Waste Generation Under the Proposed Land Use Equivalency Program**

<b>Development Scenario</b>	<b>Solid Waste Generation (lbs./day)</b>	<b>Over (Under) Proposed Project (lbs./day)</b>	<b>Percent Change From Proposed Project</b>
<b>Proposed Project</b>	17,425	--	--
<b>Equivalency Scenarios</b>			
Maximum Housing 1	18,996	1,541	8.84%
Maximum Housing 2	18,946	1,521	8.73%
Maximum Housing 3	18,990	1,565	8.98%
Maximum Retail	17,330	(95)	-0.55%
Maximum Office/Commercial	17,609	183	1.05%
Maximum Hotel	17,450	25	0.14%
<i>Source: Christopher A. Joseph &amp; Associates, July 2008 (Equivalency Calculation Worksheets are provided in Appendix I.)</i>			

## CUMULATIVE IMPACTS

Implementation of the Proposed Project, as with the Land Use Equivalency Program, in conjunction with the related projects identified in Section III (Related Projects) would further increase regional demands on landfill capacity. The total solid waste generation by the Proposed Project and the related projects would be approximately 219,666 pounds per day (see Table IV.J-19, Projected Cumulative Solid Waste Generation).

**Table IV.J-19**  
**Projected Cumulative Solid Waste Generation**

<b>Related Projects - Grouped by Land Use</b>	<b>Size</b>	<b>Unit</b>	<b>Generation Rate (pounds/day)<sup>a</sup></b>	<b>Total (pounds/day)</b>
Commercial Retail	5,468,813	sf	0.005 lbs/sf/day	27,344
Dwelling Units	7,717	du	10 lbs/du/day	77,170
Hotel	500	rm	2 lbs/rm/day	1,000
Office	3,950,112	sf	0.006 lbs/sf/day	23,701
Warehouse	15,774	sf	0.005lbs/sf/day	79
Civic Uses	1,397,884	sf	0.005 lbs/sf/day	6,989
Industrial	1,129,900	sf	0.063 lbs/sf/day	71,127
<b>Related Projects Total</b>				<b>207,410</b>
<b>Proposed Project Net Total</b>				<b>12,256</b>
<b>Cumulative Total</b>				<b>219,666</b>
<b>Proposed Project Percent of Total</b>				<b>5.6 %</b>
<sup>a</sup> Based on data in City of Los Angeles Bureau of Sanitation, Solid Waste Generation, 1981 and the California Integrated Waste Management Board, Estimated Solid Waste Generation Rates, website:				
<sup>b</sup> Dwelling units generation rate based on 2-room units.				
<i>Source: Christopher A. Joseph &amp; Associates, July 2007.</i>				

As with the Proposed Project, related projects would participate in regional source reduction and recycling programs, significantly reducing the number of tons deposited in area landfills. Although there is currently adequate capacity to accommodate the cumulative disposal needs of the Proposed Project and related projects, continued capacity is not foreseeable beyond the year 2015. While there is currently adequate capacity to accommodate the cumulative disposal needs of the Proposed Project and related projects, existing landfills within the region have a finite capacity to accommodate long-term solid waste needs of the region. Because solutions to meet future disposal needs have not yet been developed at the regional level (i.e., developing new landfills within the County and transporting waste outside the region) cumulative solid waste impacts would be significant and unavoidable.

## **PROJECT DESIGN FEATURES**

The following PDF's are proposed to be incorporated in to the project description and were used in the basis for formulating portions of the environmental analysis with respect to solid waste. As such, it is recommended that the lead agency incorporate the following PDFs as conditions of project approval.

- PDF J.4-1. As part of the Proposed Project's sustainable goals, the Project Applicant will develop and implement a construction waste management plan that identifies the materials to be diverted from disposal and whether the materials will be sorted on site or commingled on-site during the construction process.
- PDF J.4-2. The Proposed Project shall follow all applicable City of Inglewood policies related to curbside collection and recycling programs.
- PDF J.4-3. The Proposed Project shall recycle construction and demolition waste.

## **MITIGATION MEASURES**

The Proposed Project will incorporate the PDFs identified above to reduce the project's generation of solid waste to the maximum extent feasible. No additional feasible mitigation measures have been identified.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Construction-related impacts upon solid waste services and landfill capacity would be less than significant on a project-specific level, as the Puente Hills and El Sorbante Landfills have adequate capacity through the buildout of the Proposed Project.

Operational-related solid waste impacts would be significant and unavoidable as regional landfill capacity for the life of the Project beyond 2015 has not been accommodated. Because solutions to meet future disposal needs have not yet been developed at the regional level (i.e., developing new landfills within the County and transporting waste outside the region) operational solid waste impacts would be significant and unavoidable on project-specific and cumulative level.

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**ENVIRONMENTAL IMPACT ANALYSIS**  
**J. PUBLIC UTILITIES**  
**5. STORM DRAINS**

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Storm drainage systems within the City of Inglewood and Project Site are addressed in Section IV.F. Hydrology/Water Quality.