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## V. GENERAL IMPACT CATEGORIES

### A. SUMMARY OF UNAVOIDABLE IMPACTS

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The Proposed Project would result in significant unavoidable environmental impacts for the following environmental issue areas:

- Project Construction Air Quality impacts involving:
  - Exceedance of regional thresholds for VOC, NO<sub>x</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub>; and
  - Exceedance of localized emissions of PM<sub>2.5</sub>, PM<sub>10</sub>, and NO<sub>2</sub>.
- Project Operational Air Quality impacts involving:
  - Concurrent emissions that exceed the SCAQMD significance thresholds for VOC, NO<sub>x</sub>, CO, PM<sub>2.5</sub>, and PM<sub>10</sub>; and
  - Technical inconsistency with the Air Quality Management Plan.
- Project Construction Noise impacts involving:
  - Exceedance of the five dBA significance threshold at sensitive receptors near the Project Site.
- Operational and cumulative Population, Housing and Employment impacts involving:
  - Technical Inconsistency with the SCAG regional population and housing growth projections for 2015 for the City of Inglewood.
- Operational and cumulative solid waste impacts.
- Potentially cumulative traffic impacts involving:
  - Int. No. 2: Sepulveda Boulevard/Centinel Avenue (City of Los Angeles);
  - Int. No. 23: Hawthorne Boulevard/Imperial Highway (City of Hawthorne); and
  - Int. No. 47: Crenshaw Boulevard/Century Boulevard (City of Inglewood).

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## V. GENERAL IMPACT CATEGORIES

### B. GROWTH INDUCING IMPACTS

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Section 15126.2(d) of the State CEQA Guidelines requires a discussion of the ways in which a proposed project could be growth-inducing. This would include ways in which the project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Section 15126.2(d) requires an EIR to:

*“Discuss the ways in which the proposed project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects that would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may further tax existing community service facilities so consideration must be given to this impact. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed growth in any area is beneficial, detrimental, or of little significance to the environment.”*

Development projects, by their nature, are growth-inducing. The Proposed Project is intended to increase housing and employment opportunities in the City of Inglewood and to contribute to the revitalization of the Merged Redevelopment Project Area through private investment and the development of commercial, entertainment and residential uses. Additionally, some short-term employment opportunities would be provided by construction activity resulting from the Proposed Project. Such economic growth inducing impacts of the project would meet the objectives of the Merged Redevelopment Project Area.

Since the Proposed Project is located within the Merged Redevelopment Project Area, the Redevelopment Agency will receive portions of property taxes levied on increases in the assessed value of the Project Site, generated by new construction or transfers of property. Community Redevelopment Law requires that 20% of the tax increment generated from a project area be used by the redevelopment agency to increase and improve the community’s supply of affordable housing. As a result, the Proposed Project generates tax increment that can be used by the Redevelopment Agency to increase and improve the supply of affordable housing in the City. While no specific affordable housing is proposed to be created by the Proposed Project, the Proposed Project could induce growth by indirectly providing funding and an obligation for the Redevelopment Agency to create affordable housing. It should be noted that the creation of affordable housing is analyzed as part of one of the alternatives to the Proposed Project. Please refer to Section VI. F. Maximum Housing Alternative for an estimation of the impacts associated with creating affordable housing as part of the Proposed Project.

The Proposed Project would directly generate 2,995 units of housing and approximately 8,985 new residents to the City of Inglewood. As discussed in Section IV.H, Population, Housing, and Employment, the Proposed Project would not be consistent with SCAG’s 2008 Regional Transportation Plan population

and housing growth forecasts for the City of Inglewood. Updates to the 2008 RTP were well underway at the time the Notice of Preparation for the Proposed Project was circulated to the public on November 1, 2007. As such, the 2008 RTP did not anticipate the level of growth generated by the Proposed Project because Inglewood is largely built out, and the Project Site would require amendments to the General Plan, the Merged Redevelopment Plan and the zoning regulations, in addition to adoption of a Specific Plan, to transform the Project Site from its principal use as a racetrack to a master-planned, mixed-use development integrating housing, retail, office/commercial, entertainment, casino/gaming, hotel, open space and civic land uses. Despite this unanticipated growth for the City of Inglewood, this level of growth is anticipated by and can be supported by the Southern California region, including the Westside of Los Angeles and the South Bay Region. These areas have been identified as being job-rich, and in need of additional housing. Overall, SCAG has identified a need for 3,519 units in the Westside Cities subregion and 13,733 units in the SBCCOG subregion. Thus, creating more housing in the region is beneficial. Inglewood had been concerned about its ability to meet the housing demand need apportioned to it under the RHNA, and requested a redistribution of the need. Although not seen at the time of allocating the RHNA distribution of housing needs, the Hollywood Park Project has emerged as a source of potential housing for the regional needs. The Proposed Project is the type of infill redevelopment that supports the SCAG programs and goals aimed at locating housing and jobs in close proximity to each other in an effort to reduce the overall vehicle miles traveled in the region.

Increased housing units and population from the Proposed Project as well as related projects will gradually increase the burden on public utilities and services, specifically water and sewer lines, power grids, natural gas mains, public schools, libraries and parks. However, as an infill redevelopment project, the Proposed Project adds housing and population in an area with existing infrastructure and thus reduces the burden on the City to construct new facilities. Instead, it allows the public service and utility providers to meet this burden by upgrading or expanding existing facilities. Further, since the Proposed Project is an infill redevelopment project located in a very urbanized area, it is unlikely that new infrastructure or an extension of the existing infrastructure and community service facilities would be expanded beyond the needs of the Proposed Project. The Related Projects, as presented in Section III of this EIR, by their nature, take into account all foreseeable new growth in the area. The Related Projects include a list of past, present, and probable future projects to study the cumulative impacts of the Proposed Project and other development projects. The Related Projects list also includes potential City of Inglewood redevelopment projects for which no planning applications have been filed with the City. By including these projects, the analysis of cumulative impacts under each impact category in the environmental analysis in Section IV of the EIR accounts for foreseeable growth and the impacts induced by such growth.

Thus, the Proposed Project may induce growth with respect to infrastructure through immediate and gradual upgrades to community facilities. However, the growth induced by the Proposed Project would be consistent with the objectives of the Merged Redevelopment Plan. As presented in the impacts analysis of this Draft EIR, to the extent growth occurs, it is considered positive and can be accommodated.

The Proposed Project's newly generated resident and employee populations may produce demand for goods, services or facilities not directly provided or satisfied by the Proposed Project, which could indirectly induce growth in the City. The proposed land uses generate 2,995 dwelling units and 517 net new jobs. As already analyzed, the populations generated by these uses would be expected to generate demand for publicly provided services, such as police and fire protection, library, school and recreation facilities. This demand could require off-site expansion, which would be considered indirectly growth-inducing. However, off-site expansion of public services would be in proportion to demand and the Proposed Project provides the fiscal means for the respective service agencies to address the demand. In addition, the Proposed Project includes a 4-acre civic site which is proposed to be made available to a public entity, which could be developed as a school, library or community center. The Proposed Project also includes the development of approximately 25-acres of open space and a police substation in the mixed-use area of the Project Site. In this way, the Proposed Project directly provides public facilities to alleviate the growth it induces, in addition to accommodating the existing City population.

The Proposed Project may also generate demand for secondary services such as retail, restaurant, recreation and entertainment, or other service-related uses. Much or most of the Proposed Project's demand for these services is intended to be accommodated on-site given the mix of land uses provided on the Project Site. The Proposed Project is a master-planned mixed-use community designed to provide a balanced mix of residential, retail, restaurant, office/commercial, entertainment, casino/gaming, civic, open space and hotel uses on-site to meet the demands of the on-site residents and employees, as well as the community at large. Some demand should be expected to spill over off-site, which may induce new sources of supply if the demand would warrant. Due to the large extent to which the Proposed Project has been designed and programmed to provide for on-site demands, the Proposed Project's contribution to growth-inducement for secondary services is expected to be minimal.

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## V. GENERAL IMPACT CATEGORIES

### C. IMPACTS FOUND TO BE LESS THAN SIGNIFICANT

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The City of Inglewood Planning and Building Department (the City) has determined through the scoping process that the Proposed Project would not result in potentially significant impacts related to the environmental topics listed below. Section 15128 of the State CEQA Guidelines states:

*An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Such a statement may be contained in an attached copy of the Initial Study.*

Upon review of the City's Initial Study Checklist (as adapted from the CEQA Guidelines Appendix G Checklist), it has been determined that there is no substantial evidence that the Proposed Project could cause significant environmental effects in the following areas: Agricultural Resources, Biological Resources, and Mineral Resources. Therefore, no further environmental review of these issues is necessary for the reasons described below. For further analysis of each issue, see the Initial Study that was prepared for the Proposed Project, which is contained in Appendix A-2.

#### **AGRICULTURAL RESOURCES**

The Proposed Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. The Project Site is currently fully developed with commercial and recreational uses and does not contain any agricultural uses. Additionally, the Project Site and immediately surrounding areas are zoned for commercial and multi-family residential use, and is not delineated or designated for use as agricultural land pursuant to the maps prepared for the Farmland Mapping and Monitoring Program.<sup>1</sup> Therefore, the development of the Proposed Project would not convert any farmland to a non-agricultural use, and no impact would occur.

#### **BIOLOGICAL RESOURCES**

The Project Site is located within an urban area and is fully developed. The Project Site is not expected to contain any species identified as candidate, sensitive, or special status by local or regional plans, policies, or regulation, or by the California Department of Fish and Game (CDFG) or U.S. Fish and Wildlife Service (USFWS). The Project Site does not contain any riparian habitat, wetlands or other sensitive

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<sup>1</sup> State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, website: [http://www.consrv.ca.gov/dlrp/FMMP/images/fmmp2002\\_300.pdf](http://www.consrv.ca.gov/dlrp/FMMP/images/fmmp2002_300.pdf), November 30, 2006.

natural community and is not within an area designated by an adopted habitat conservation plan, natural community conservation plan, or other approved habitat conservation plan. Furthermore, the existing vegetation on the Project Site is ornamental.

## **MINERAL RESOURCES**

The Project Site has been developed for several decades with commercial uses and recreational uses associated with horse racing. No classified or designated mineral deposits of Statewide or regional significance are known to occur in the Proposed Project area. The Project Site is not within a known source area for aggregate or other mineral resources. Additionally, the Project Site is not located in an area of potential petroleum resources. Therefore, the Proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. No impact would occur to mineral resources with implementation of the Proposed Project.

Furthermore, the Project Site is not delineated as a locally-important mineral resource recovery site on any City plans. The Project Site is zoned C-R (Commercial and Recreation) and there are no known mineral resources beneath the Project Site. Development of the Proposed Project and would not result in the loss of availability of a locally-important mineral resource recovery site. No impact would occur to mineral resources with implementation of the Proposed Project.