
VI. ALTERNATIVES TO THE PROPOSED PROJECT

A. INTRODUCTION

INTRODUCTION

As stipulated in Section 21002.1(a) of the CEQA Statutes (Public Resources Code):

The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to a project, and to indicate the manner in which those significant effects can be mitigated or avoided. [emphasis added]

More specifically, State CEQA Guidelines Section 15126.6(b) requires an EIR to describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives that are deemed “infeasible.”

ALTERNATIVES REJECTED AS BEING INFEASIBLE

Section 15126.6(c) of the State CEQA Guidelines requires an EIR to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process, and briefly explain the reasons underlying the lead agency’s determination. In accordance with CEQA Guidelines Section 15126.6(f), among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. As stated previously, an EIR only needs to analyze an alternative location that is capable of avoiding or substantially lessening any significant effects of the Proposed Project.

Pursuant to Section 15126.6 of the State CEQA Guidelines, EIR preparers are encouraged to evaluate whether any of the significant effects of the Proposed Project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen the significant effects of the Proposed Project need be considered for inclusion in the EIR (CEQA Guidelines Section 15126.6(f)(2)(a)). The selection of an alternative location was rejected for consideration within this analysis because of the project’s unique factors relating to the size and existing use of the Project Site. The Proposed Project involves the redevelopment of a 238-acre property that is currently developed with the Hollywood Park Racetrack and Casino. Horseracing in California is a declining business industry largely due to increased competition for the public’s recreation and entertainment dollars. The increases in Indian gaming in California and the increases in purses in other states have called into question the long-term economic viability of horse racing in California. The decline in simulcast

revenues at Hollywood Park when there is no live racing is further evidence of the decline in the horseracing industry. (See Table IV.H-3, in Section IV.H, Population, Housing and Employment.) As a result, the Proposed Project's principal goal is to redevelop the Project Site to provide the highest and best use in the absence of horseracing. Thus, moving the project to another location would not serve this goal. Furthermore, with respect to implementing the objectives of the project that pertain to the City of Inglewood (see Project Objectives below), there are no remaining contiguous properties within the Merged Redevelopment Project Area of City of Inglewood that are large enough to accommodate a project of this size. For these reasons, an alternative location was deemed to be infeasible and was not further evaluated within the scope of this EIR.

PROJECT OBJECTIVES

As guided by Section 15126.6 (c), the range of alternatives to be included in the alternatives analysis shall include those that could feasibly accomplish most of the basic objectives of the Proposed Project and could avoid or substantially lessen one or more of the significant effects. The primary goal of the Proposed Project is to meet the demand for residential housing and provide neighborhood-serving retail, hotel, and commercial/entertainment uses in the City of Inglewood. As stated in Section II, Project Description, the specific objectives of the Proposed Project include the following:

1. To contribute to the revitalization of the City of Inglewood by providing an example of "smart-growth" infill development consisting of mixed-use retail, office, hotel, residential development, and integrated open space;
2. To provide an economically viable project that promotes the City's economic well-being by significantly increasing property and sales tax revenues and providing high-quality retail uses and the opportunity for transient occupancy tax;
3. To preserve the Casino/Gambling Facility on the Hollywood Park Site.
4. To provide land for a civic/public use.
5. To create exciting community park and open space areas, that exceed the City's existing General Plan goals of one acre per 1,000 residents, in a manner that meets the needs of the proposed development and is beneficial to the overall community;
6. To add a variety of ownership-housing opportunities, of different product types and prices, in an area of the greater Los Angeles region that is job-rich, thus creating a better balance of housing and employment opportunities;
7. To provide opportunities for viable retail and creative office space in a manner that is complementary to the existing character of the adjoining residential neighborhood;

8. To eliminate and prevent the spread of blight and deterioration by providing housing ownership opportunities, retail and restaurant uses, and public open space within portions of the Merged Redevelopment Project Area;
9. To create safe, secure and defensible spaces through project design, while also allowing public spaces, such as parks and retail, to be open to the public;
10. To provide a state-of-the-art sustainability program to be incorporated into the buildout and operation of the Proposed Project;
11. To promote walking and bicycle use through enhanced pedestrian connections and bicycle pathways in a mixed-use project which integrates housing with employment opportunities;
12. To promote a safe pedestrian-oriented environment by providing extensive streetscape amenities; and
13. To enhance the visual appearance and appeal of the neighborhood by providing perimeter and interior landscaping.

OVERVIEW OF SELECTED ALTERNATIVES

Section 15126.6 of the State CEQA Guidelines states that project alternatives should feasibly attain “most of the basic objectives of the project,” even though implementation of the project alternatives might, to some degree, impede the attainment of some of those objectives or be more costly. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. Therefore, in order to compare the merits of the various alternatives’ ability to reduce environmental impacts and meet or attain as many of the project’s objectives as possible, the following alternatives were selected:

- No Project Alternative – Continuation of Existing Land Uses: This alternative analyzes the environmental consequences of the on-going operation of the existing Hollywood Park Racetrack and Casino without any new discretionary requests.
- No Project Alternative - Reasonably Foreseeable Future Development (Football Stadium/Casino) Alternative: This Alternative evaluates a theoretical scenario in which the Proposed Project does not go forward, but an alternative project consistent with the underlying zoning regulations is developed. The development of an athletic stadium is considered a reasonably foreseeable development because (1) it is consistent with the current zoning designation, and (2) it reflects a development proposal that was previously proposed and analyzed in an EIR in 1995. This alternative analyzes the impacts of demolishing the existing Grandstand, Racetrack, and Barn Areas, and retaining the Casino and constructing an approximate 65,000 seat state-of-the-art Athletic Stadium.

- No Project Alternative - Reasonably Foreseeable Future Development (Convention Center/Hotel/Casino) Alternative: This Alternative evaluates a theoretical scenario in which the Proposed Project does not go forward, but an alternative project consistent with the underlying zoning regulations is developed. The Convention Center Alternative would result in the development of a state-of-the-art convention center facility containing 300,000 sf of exhibition space, 50,000 sf of meeting space, a 50,000 sf ballroom, and a 650-room hotel. This Alternative analyzes the impacts of the continued operation of the existing Casino, the removal and discontinuation of the existing racetrack component, and the addition of the Convention Center, Hotel, and associated uses.
- Alternative RU 800/Reduced residential/retention of racing and racetrack: This Alternative involves a reduced residential project with retention of racing and the racetrack and the removal of the Casino. This alternative analyzes the impacts of retaining racing at Hollywood Park, while utilizing the surrounding surface parking lots for the development of on-site residential uses. Although there are no identified adverse environmental impacts relative to demolition of the racetrack and relocation of racing, as part of the community outreach process conducted during the earlier phases of the planning process, some have raised the question of whether new development can be attained without loss of live racing at Hollywood Park. This alternative analyzes the potential impacts of such an approach.
- Alternative RU 1,000/All single-family alternative/residential density, 1,000 units: This Alternative involves the demolition of the racetrack and Casino, and the construction of an all single-family residential development with 1,000 dwelling units. This alternative analyzes the impacts of developing ownership housing opportunities on-site, but exclusively in a single-family configuration, without the additional commercial uses, cinema, office, hotel and retail.
- Alternative RU 3,500/Increased Residential Project/3,500 Dwelling Units: This Alternative includes an increased residential project with 3,500 dwelling units. This alternative analyzes the impacts of providing additional housing opportunities on-site. To the extent, for example, affordable housing is located on-site in addition to housing proposed by the project, this alternative provides information regarding the impacts of the additional units.
- Maximum Housing Unit Alternative (with Affordable Housing): This Alternative maximizes the construction of housing, in particular, affordable housing. Specifically, this Alternative includes the development of a maximum of 3,500 dwelling units on the Project Site, a maximum of 525 affordable dwelling units (to be provided off-site within the Merged Redevelopment Project Areas), approximately 620,000 sf of retail use, approximately 120,000 sf of casino use, a 300-room hotel with 20,000 sf of meeting room space, approximately 25,000 sf of office space, approximately 25 acres of open

space, and approximately 10,000 sf of community space. A four-acre site would also be made available for civic uses which could be a combination of one or more uses such as a school, library, community center, etc., subject to economic feasibility.

In addition to the discussion and comparison of impacts of a proposed project and the alternatives, Section 15126.6 of the State CEQA Guidelines requires that an “environmentally superior” alternative be selected among the alternatives that are evaluated in the EIR. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. Alternative RU 1,000 was identified as the Environmentally Superior Alternative. The Environmentally Superior Alternative is identified and discussed in greater detail in Section VI.G.

Analytical Assumptions and Methodology

Pursuant to Section 15126.6(d) of the State CEQA Guidelines, the level of detail in which the Proposed Project is analyzed is not required in the alternatives analysis. Rather, an EIR should include “sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.” As such, the alternatives analysis is presented as a comparative qualitative and, to the extent feasible, quantitative analysis to the Proposed Project. This alternatives analysis presumes that all applicable and feasible mitigation measures proposed for the Proposed Project would apply to each alternative, as applicable in accordance with the anticipated level of impact, unless otherwise stated.