
VI. ALTERNATIVES TO THE PROPOSED PROJECT

B.1 NO PROJECT ALTERNATIVE – CONTINUATION OF EXISTING LAND USES

CEQA requires a No Project Alternative be evaluated in every EIR. The purpose of analyzing a No Project Alternative is to allow decision-makers to compare the impacts of the Proposed Project with those impacts that would otherwise occur in the absence of the Proposed Project (State CEQA Guidelines Section 15126.6(e)(1)). Pursuant to State CEQA Guidelines Section 15126.6(e)(2):

The “no project” analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans, and consistent with available infrastructure and community services.

The currently existing environmental conditions are discussed in detail in each respective chapter of Section IV, Environmental Impact Analysis. This Alternative assumes that the existing conditions will persist “as is” without any new construction improvements in the near future. Currently, the Project Site is occupied by the Hollywood Park Turf Club and Casino and associated surface parking lots. Under the No Project Alternative, it is assumed that the existing Hollywood Park Turf Club and Casino would remain in operation.

To assist the decision makers in their review, this analysis of the No Project Alternative compares the No Project Alternative to the applicable thresholds of significance. By doing so, the analysis helps compare the impacts of the Proposed Project to the continuation of existing land uses, and captures that in some cases, the Proposed Project would reduce the impacts as compared to the continuation of the existing uses.

Aesthetics

Views and Urban Design

Impacts on views and urban design under the Proposed Project would be less than significant after mitigation. Under the No Project Alternative, the existing racetrack, casino and surface parking uses would remain on the Project Site. Photographs depicting the aesthetic characteristics of the Project Site and immediately surrounding area are shown in views 1-39 in Section IV.A, Aesthetics. Because the No Project Alternative would not result in any new construction or demolition, the visual character and quality of the Project Site and its surroundings would not be altered or otherwise degraded. Although the urban context under the No Project Alternative would remain unaltered, a notable difference in urban content and design between the two scenarios would result.

Under the No Project Alternative, none of the project objectives would be realized and the urban revitalization intended to improve the aesthetic quality of the Project Site and its surroundings would not

take place. Although the No Project Alternative would result in no impact to the existing conditions on the Project Site, this Alternative would preclude the revitalization of the Project Site with land uses that are consistent with the urban context of the surrounding land uses. For this reason, the Proposed Project would be more beneficial than the No Project Alternative. Impacts under this Alternative would nonetheless be less than significant.

Light and Glare

Impacts on light and glare under the Proposed Project would be less than significant after mitigation, and improved as compared to existing conditions. Under the No Project Alternative, light and glare would remain as it currently exists and no impact would occur. However, while the No Project Alternative would not result in any change to the existing conditions on the Project Site, existing uses currently generate a substantial amount of nighttime light pollution and daytime glare associated with the vehicles on passing streets, security and racetrack lighting, and illuminated parking lots. Therefore, although no new impact would occur, existing light and glare impacts would be considered significant and unavoidable under this Alternative on a stand-alone basis.

Shade and Shadow

Shade and shadow impacts under the Proposed Project would be less than significant. Under the No Project Alternative, shade and shadow patterns would remain as currently exists. Existing buildings on the Project Site range from one to six stories, with the grandstand extending approximately 150 feet above grade. All structures on the Project Site are centrally located onsite and do not create any significant shade and shadow impacts on adjacent properties. Likewise, the structures for the Proposed Project would be range from 25 to 60 feet in height, with the hotel, the highest structure, standing at approximately 150 feet above grade. Due to the setback from the property line and roadway widths, none of the Proposed Project's structures would cast shadows upon adjacent land uses for more than 3 hours during the summer or winter months. Therefore, impacts under this Alternative with respect to shade and shadow would be considered less than significant.

Air Quality

Construction

Construction-related impacts on air quality under the Proposed Project would be significant and unavoidable. Under the No Project Alternative, construction activities would not occur on the Project Site and no construction emissions would be generated. Therefore, the No Project Alternative would result in no construction related air quality impacts.

Operation

Operational impacts on air quality under the Proposed Project would be significant and unavoidable. Emissions currently generated by the existing land uses at the Hollywood Park site exceed the SCAQMD

threshold for VOC, NO_x, CO, PM_{2.5} and PM₁₀ emissions. As shown in Section IV.B, Air Quality, the existing uses currently generate 153 lbs/day of VOC, 105 lbs/day of NO_x, 1,962 lbs/day of CO, 60 lbs/day of PM_{2.5} and 309 lbs/day of PM₁₀. Comparatively, these emissions represent between 31% and 67% of the emissions estimated to be generated by the Proposed Project. Even though the No Project Alternative produces fewer operational emissions than the Proposed Project, if the No Project Alternative is compared to the thresholds of significance, it would exceed the SCAQMD thresholds. Therefore, although no new impact would occur, the No Project Alternative would result in significant and unavoidable operational air quality impacts on a stand-alone basis.

Geology and Soils

Impacts on geology and soils under the Proposed Project would be less than significant after mitigation. Under the No Project Alternative, no grading or excavation would take place; thus, no impacts associated with grading or excavation would occur. Likewise, there would be no impact to erosion, topsoil, or groundwater, nor would geologic hazards result. However, the location of the Proposed Project and the No Project Alternative would remain the same. Likewise, threat of fault rupture and seismic shaking would be the same. Therefore, these impacts would be less than significant.

Hazardous Materials and Risk of Upset

Construction

Construction-related impacts on hazardous materials and risk of upset under the Proposed Project would be less than significant after mitigation. Under the No Project Alternative, the existing racetrack, casino and surface parking uses would remain on the Project Site and no demolition, excavation, or other construction activities would take place. Therefore, the No Project Alternative would not have the potential to disturb or release any hazardous materials associated with construction activities and no impact would occur. As such, the No Project Alternative would have no impacts with respect to hazardous materials and risk of upset during construction.

Operation

Operational impacts with respect to hazardous materials and risk of upset under the Proposed Project would be less than significant after mitigation. Under the No Project Alternative, the existing racetrack, casino, and surface parking uses would remain in operation on the Project Site. These uses do not generate substantial amounts of potentially hazardous materials beyond those commonly associated with laundromat, racetrack and horse-care facility uses and surface parking. The use and storage of such materials would be generally comparable to those associated with the Proposed Project's mix of residential, retail, casino and office uses. Therefore, the No Project Alternative would result in less-than-significant impacts after mitigation.

Cultural Resources

Cultural Resources Records Search

A cultural resources records search was conducted for the Hollywood Park Redevelopment Project Property by the South Central Coastal Information Center, California Historical Resources Information System. Based on a review of all recorded archaeological sites within a ½-mile radius of the Project Site and cultural resource reports on file, database records for all California Points of Historical Interest, California Historical Landmarks, the California Register of Historical Resources, the National Register of Historic Places, and the California Historical Resources Inventory listings, no significant cultural resources are known to be located on the Project Site. Therefore, the No Project Alternative would result no impact to known cultural resources.

Historical Resources

The Proposed Project would result in no impacts to historic resources. Currently the Project Site is developed with the existing Hollywood Park Turf Club and Casino. Through a comprehensive historic resource analysis (refer to Section IV.E Cultural Resources), which included a field investigation of the Project Site and surrounding area, review of building permit records, maps, books and photographs, it was determined, through an evaluation of criteria used by the California Register of Historical Resources, that none of the buildings currently existing on the project site are considered significant historic resources pursuant to CEQA. The No Project Alternative would involve no changes to existing structures, and would therefore have no potential to impact historic resources.

Hydrology/Water Quality

Construction

Construction-related impacts on water quality under the Proposed Project would be less than significant after mitigation. Under the No Project Alternative, no development would occur, thus the following construction-related impacts to water quality would be avoided: the handling, storage and disposal of construction materials containing pollutants; the maintenance and operation of construction equipment; and earth moving activities which, when not controlled, may generate soil erosion and transportation via storm runoff or mechanical equipment and subsurface activities which can release chemicals into groundwater. Furthermore, dewatering would not take place. Therefore, there would be no impact to water quality due to construction-related impacts under the No Project Alternative.

Operational

Operational impacts on water quality under the Proposed Project would be less than significant after mitigation. Under the No Project Alternative, no development would take place and no new impact would occur. For this reason, the No Project Alternative would have less than significant impacts.

Noise

Impacts on construction noise under the Proposed Project would be less than significant after mitigation. Under the No Project Alternative, increased noise levels and vibration associated with construction would not result and otherwise subsequent impacts would be avoided and no impact would occur. Therefore, this Alternative would have no impact with respect to construction-related noise.

Operational impacts on noise under the Proposed Project would be less than significant after mitigation. Under the No Project Alternative, operational noise would remain as currently exists and therefore no new impact would occur.

Population, Housing, and Employment

Impacts on population, housing and employment under the Proposed Project would be significant and unavoidable. Under the No Project Alternative, population, housing and employment would stay the same and thus no impact would occur. The Project Site currently has no residential units and does not directly generate population growth. Currently, there are approximately 2,618 full-time equivalent jobs, 1,601 of which are associated with the current horseracing operations on property. However, the continuance of horseracing at Hollywood Park is speculative and subject to the economic viability of the industry. Over time, the continuing decrease in attendance at racing events could result in the loss of the 1,601 jobs associated with the current horse racing operations.

The Proposed Project would generate over 17,105 construction-related jobs over the 10-year buildout horizon. Although, the elimination of the racetrack will displace 1,601 associated jobs, the proposed commercial and residential land uses are estimated to generate approximately 3,181 jobs, including the retention/relocation of the 1,017 existing Casino-related jobs, producing a net employment gain of 563 jobs. Additionally, the Proposed Project is expected to create approximately 2,995 new residential dwelling units resulting in approximately 8,985 new permanent residents. Although this Alternative avoids the Proposed Project's significant and unavoidable impact due to a technical inconsistency with regional housing and population growth forecasts, the Alternative is less beneficial with respect to population and housing because it does not further the SCAG's goals outlined in the Compass Growth Vision Strategy to encourage better relationships between housing, transportation and employment. Likewise, this Alternative does not support the SBCCOG's South Bay Strategy of supporting incentives for well-planned mixed-use development and affordable housing, nor does it aid in creating new market rate and affordable dwelling units needed in Inglewood as determined by the RHNA. Since no dwelling units are created under this Alternative, unlike the Proposed Project, it does not help to bring balance to the job-to-housing ratio in the surrounding job-rich South Bay and Westside job markets. Additionally, this Alternative does not support the Housing Element's goal of providing a significant amount of additional home ownership opportunities within the City so as to promote a balanced ratio of renter-occupied versus owner occupied housing opportunities within the City. Overall, since the long term future of horse racing is speculative, the No Project Alternative could result in a significant and unavoidable impact due to the displacement of the racing related jobs on the Project Site.

Land Use and Planning

Impacts on land use and planning under the Proposed Project would be less than significant after mitigation. Under the No Project Alternative, the existing land uses would remain on the Project Site which would eliminate the need for any variances or other discretionary actions pursuant to the Planning and Zoning Code; therefore, no impact would occur. Although the residential and commercial uses proposed are consistent with surrounding land use, they require a General Plan Amendment, adoption of a specific plan and a Zone change. Although the No Project Alternative would not require any type of plan amendment or zone change, the horseracing related uses are not as compatible with adjacent uses, and inconsistent with the goals of the Redevelopment Plan for the Merged Project Area. Nevertheless, land use planning impacts under the No Project Alternative and the Proposed Project are less than significant.

Public Utilities

With the exception of solid waste, impacts on public utilities under the Proposed Project would be less than significant and no mitigation measures are required.

Water

Under the No Project Alternative, no changes to the existing land uses or operations at the Project Site would occur. As shown in Section IV.J.1, Utilities, Water, the existing uses on the Project Site are estimated to utilize approximately 360 acre-feet per year. The existing Hollywood Park Racetrack and Casino also uses approximately 11,370 gpd of recycled water, which provides significant water conservation to regional water supplies. No additional water would be consumed with this Alternative and no improvements to water infrastructure would be required; therefore, no new impact or additional demand on water supply would occur. Thus, impacts would be less than significant.

Wastewater

Under the No Project Alternative, no changes to the existing land uses or operations at the Project Site would occur, and no new or expanded wastewater facilities would be needed. As discussed in Section IV.J.2, Utilities, Wastewater, the existing uses on the Project Site are estimated to generate approximately 524,000 gallons per day (gpd) of wastewater. No additional wastewater demands would be created under this Alternative and no improvements to water infrastructure would be required; therefore, impacts would be less than significant.

Energy

Electricity

Under the No Project Alternative, no new residents, employees, or other site visitors would be introduced to the Project Site and no new electricity demand would result. Thus, as shown in Section IV.J-3, Energy Conservation, electricity demands under the No Project Alternative would continue to be approximately

26,010,004 kilowatt hours of electricity per year. The Proposed Project is projected to increase existing electricity consumption by approximately 6,836,844 kW-hr/year. However, California Edison has stated that it would be able to provide electrical service to the Project Site. Therefore, the No Project Alternative would result in less than significant impacts on electricity demand.

Natural Gas

Under the No Project Alternative, no new residents, employees, or other site visitors would be introduced to the Project Site and no new demands for natural gas would result; therefore, no new impact would occur. As shown in Section IV.J.3, Energy Conservation, natural gas demands under the No Project Alternative would continue to be approximately 3,894,900 cubic feet of natural gas per month. The Proposed Project's net natural gas demands are projected to be approximately 23.7 million cf per month. However, the Southern California Gas Company has stated that it can provide natural gas to service the Proposed Project. Therefore, the No Project Alternative would result in less than significant impacts on natural gas demand.

Solid Waste

Under the No Project Alternative, no new construction would occur on the Project Site; therefore, no construction-related waste would be generated. Additionally, under the No Project Alternative, the absence of additional residents, employees, or other site visitors would avoid increased operational solid waste. Existing land uses on the Project Site are estimated to generate approximately 906 tons per year of solid waste (for existing commercial uses). The Proposed Project would generate approximately 80,595 tons of construction and demolition debris that would need to be disposed of in landfills and/or recycled. Additionally, upon full occupancy, the Proposed Project is expected to generate approximately 12,461 net pounds (6.2 tons) of solid waste per day, or approximately 2,263 tons per year. While the Puente Hills and El Sobrante Landfills have adequate capacity to continue to serve the existing uses through 2015, 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 existing uses would continue to generate additional solid waste beyond the expected life of the landfills serving the Project Site, operational solid waste impacts would be considered significant and unavoidable.

Public Services

Impacts on public services under the Proposed Project would be less than significant with mitigation.

Police Protection

Under the No Project Alternative, no new residents, employees, or other site visitors would be introduced to the Project Site who could potentially increase the demand for police protection and create a need for new or expanded police stations and therefore, no impact would occur. The Proposed Project would introduce approximately 8,985 new residents to the project site and require additional police services during construction. As such, the number of calls requesting police responses to home and retail burglaries, vehicle

burglaries, damage to vehicles, traffic-related incidents, and crimes against persons would be anticipated to increase. Therefore, the No Project Alternative would result in less than significant impacts with respect to police protection.

Fire Protection

Under the No Project Alternative, no new residents, employees, or other site visitors would be introduced to the Project Site who could potentially increase the demand for fire protection and create a need for new or expanded fire stations; therefore, no impact would occur. The Proposed Project would introduce approximately 8,985 new residents to the Project Site, require additional fire protection services. Additionally, removal of existing on-site buildings and construction of the Proposed Project could increase the potential for accidental on-site fires from such sources as the operation of mechanical equipment, the use of flammable construction materials and careless disposal of cigarettes. Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and by partial lane closures during street improvements and utility installations. Therefore, the No Project Alternative would result in less than significant impacts with respect to fire protection.

Schools

Under the No Project Alternative, no new residents or employees would be introduced to the Project Site who could generate an increase in students and create a need for new or expanded schools; therefore, no impact would occur. The Project Site is located within ¼ mile of eight institutional sensitive receptors. Moreover, the Proposed Project would result in the generation of 575 students including 279 elementary students, 137 middle school students, and 159 high school students. To mitigate the impact on schools the Proposed Project proposes to set aside a 4-acre site for civic uses and is responsible for mandatory payment of school fees in conformance with SB 50. Although the No Project Alternative would result in no impact (or no change) to the existing conditions on the Project Site, this Alternative would preclude any funding through the payment of developer fees and the 4-acre site which could be utilized by the Inglewood School District, subject to economic feasibility and determinations of the School District and the City of Inglewood to develop this public benefit area.

Parks and Recreation

Under the No Project Alternative, no new residents would be introduced to the Project Site who could generate a demand for increased parkland and create a need for new or expanded park facilities; therefore, no impact would occur. Based on the City General Plan Open Space and Parks Element Ratio, the Proposed Project would generate a need for approximately 9 acres of public parkland. This will be fulfilled by providing 25 acres of open space on the Project Site. The Proposed Project provides an amount of park and recreational facilities in excess of the General Plan goal of 1 acre per 1,000 residents. Nonetheless, this Alternative would result in less than significant impacts with respect to parks and recreation.

Libraries

Under the No Project Alternative, no new residents would be introduced to the Project Site who could generate a demand for increased library space and create a need for new or expanded libraries; therefore, no impact would occur. The Proposed Project would introduce approximately 8,985 new residents to the Project Site and require additional library services, specifically increasing demand for public-use computers. However, through the potential allocation of the four-acre civic center site and contribution to the City's tax revenue, these demands would be met. Overall, the No Project Alternative result in a less than significant impact on library services.

Traffic and Transportation

Impacts on traffic and transportation under the Proposed Project would be less than significant with mitigation. The No Project Alternative involves no development and the continued operation of the existing Hollywood Park Racetrack and Casino. The vehicular access associated with the No Project Alternative will be consistent with the access currently provided for the site. As stated previously, based on the Circulation Element of the Inglewood General Plan (adopted December 15, 1992), the Hollywood Park racetrack has historically accommodated approximately 40,000 vehicles and over 50,000 patrons during a typical race day. As there is no change of use proposed under this alternative, no new trip generation is forecast. Therefore, no new impact would occur.

The Proposed Project is forecast to generate demand for 79 new transit trips (29 inbound trips and 50 outbound trips) during the weekday AM peak hour. During the PM peak hour, the Proposed project is forecast to generate demand for nominal new transit trips. Over a 24-hour period, the Proposed Project is forecast to generate a demand for 828 new daily transit trips.

Although the No Project Alternative would not result in any significant project-related impacts, the intersection operating conditions of the surrounding street system will continue to deteriorate in the future due to the regional ambient traffic growth and other development projects in the area. Although it is anticipated that existing transit service will be able to accommodate the Project generated transit trips and the public transit system will not be impacted, there is still a trip increase. Overall, this Alternative would result in less than significant impacts on traffic and transportation.

Parking

Impacts on parking under the Proposed Project would be less than significant. Under the No Project Alternative, the existing mix and size of land uses would remain unchanged and the resulting parking requirements for the Project Site would also remain unchanged. Therefore, no new parking demand would be created under this Alternative and this impact would be considered less than significant.

Conclusion

Although the No Project Alternative would avoid the construction-related significant and unavoidable air quality impacts, existing operational emissions currently exceed SCAQMD thresholds. In this regard, the No Project Alternative would not effectively reduce a significant and unavoidable operational air quality impact. Additionally, although the No Project Alternative avoids the significant and unavoidable impact due to technical inconsistency with regional housing and population growth forecasts, it does not further any of the City and regional goals of creating housing, both affordable and market rate, to address the housing needs of the region, and due to the speculative nature of the continuation of horse racing, over time the No Project Alternative could nevertheless result in a significant and unavoidable impact to population and housing due to the loss of 1,601 racing-related jobs. Additionally, although the No Project Alternative is not a new use because landfill capacity beyond 2015 has not been accommodated, the No Project Alternative would not effectively reduce a significant and unavoidable impact of the Proposed Project.

As described in Table VI.B.1-1, below, the No Project Alternative would fail to achieve 9 of the 13 Project Objectives. Objective 3 (retention of the Casino/Gambling operations), is the only objective that would be completely satisfied by this alternative. Objectives 2, 4, 9 and 13 would be met to some degree by the No Project Alternative, but not to the same degree as the Proposed Project. Objectives 1, 5, 6, 7, 8, 10, 11, and 12 would not be met at all under this Alternative.

**Table VI.B.1-1
Assessment of the No Project Alternative to Meet the Project Objectives**

Project Objectives	Assessment of the Alternative to Meet Objectives
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.	The No Project Alternative would not meet this objective as it would not result in any redevelopment on the Project Site.
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.	The No Project Alternative would involve the retention of the existing Hollywood Park Racetrack and Casino which contributes to the City’s sales tax and OTB revenue. While the No Project Alternative may prove economically viable for the near future, racetrack revenues and attendance have been declining over time and the racing industry may or may not support the continued operation of the Hollywood Park Racetrack in the long-term.
3. To preserve the Casino/Gambling Facility on the Hollywood Park Site.	The No Project Alternative would be consistent with this project objective, as the Casino and Gambling facility would continue to operate.
4. To provide land for a civic/public use.	The No Project Alternative would not meet this objective in the same manner as the project. The existing Hollywood Park Racetrack and Casino are however a regional recreational land use that is enjoyed by the public.
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	The No Project Alternative would not create any new community park and open space areas. Therefore this

Project Objectives	Assessment of the Alternative to Meet Objectives
a manner that meets the needs of the proposed development and is beneficial to the overall community.	objective would not be met.
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.	The No Project Alternative would not add any ownership-housing opportunities. As such, this objective would not be met.
7. To provide opportunities for viable retail and creative office space in a manner that is complimentary to the existing character of the adjoining residential neighborhood.	The No Project Alternative would not add any office space opportunities. As such, this objective would not be met.
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.	The No Project Alternative would not involve any new construction or rehabilitation of existing uses. While the existing uses would remain operational for the foreseeable future, the No Project Alternative would not provide housing ownership opportunities, retail and restaurant uses, or public open space within the Merged Redevelopment Project Area. Therefore, this objective would not be met.
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.	The Hollywood Park Racetrack and Casino are operated and maintained in a manner that creates a safe, secure and defensible environment for visitors and employees. While the No Project Alternative would not provide new public spaces, such as parks and retail, this objective would be satisfied, but to a lesser degree than the Proposed Project.
10. To provide a state-of-the-art sustainability program to be incorporated into the buildout and operation of the Proposed Project.	The No Project Alternative would not involve any new construction. As such the opportunity to provide sustainable building practices would be precluded. Due to the age of the existing facility, the current infrastructure and utility systems may not be as efficient as the current materials and systems. Therefore this objective would not be met.
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.	The No Project Alternative would not promote walking and bicycle use through enhanced pedestrian connections and bicycle pathways. As such this objective would not be met.
12. To promote a safe pedestrian-oriented environment by providing extensive streetscape amenities.	The No Project Alternative would not provide any new streetscape amenities. Therefore this alternative would not promote pedestrian activity to the local neighborhood.
13. To enhance the visual appearance and appeal of the neighborhood by providing perimeter and interior landscaping.	The existing Hollywood Park Racetrack and Casino grounds are currently landscaped to enhance the visual appearance and appeal of the facility. While the Project Site includes a perimeter and interior landscaping, this objective would not be met to the same degree as the Proposed Project which would integrate landscaping features into the common areas and along pedestrian corridors and paseos.