
IV. ENVIRONMENTAL IMPACT ANALYSIS

H. POPULATION, HOUSING & EMPLOYMENT

ENVIRONMENTAL SETTING

The Project Site is located in the City of Inglewood, which is one of eighty communities that form the greater Los Angeles metropolitan area. The Proposed Project Site is located within the planning area of the Southern California Association of Governments (SCAG), the Southern California region's federally-designated metropolitan planning organization. As part of its comprehensive planning process for the Southern California region, SCAG has divided its jurisdiction into 14 subregions. The City of Inglewood is located within the South Bay Cities Council of Governments (SBCCOG) subregion. The Regional Comprehensive Plan and Guide (RCPG) was adopted in 1994 (amended in 1996) by the member agencies of SCAG to set broad goals for the southern California region and identify strategies for agencies at all levels of government to guide their decision-making process. Adopted RCPG policies related to growth are contained primarily in Chapter 3 of the RCPG. Among other goals, the Growth Management chapter presents forecasts for growth and land consumption in the region. The South Bay Cities Council of Governments (SBCCOG) established a subregional policy under SCAG of which Inglewood is a member city.

The Project Site is also within two constituent project areas of the Amended and Restated Redevelopment Plan (the "Redevelopment Plan") for the Merged In Town, La Cienega, Manchester-Prairie, North Inglewood Industrial Park, Century, and Imperial-Prairie Redevelopment Projects (the "Merged Redevelopment Project Area," each individual area, a "Constituent Project Area") - the Century Constituent Redevelopment Project Area and the Manchester-Prairie Constituent Redevelopment Project Area. The Proposed Project is subject to the City of Inglewood General Plan, and specifically the policies within the Housing Element.

Population and Housing

Based on SCAG's Regional Transportation Plan Growth Forecast data (RTP, 2008), the City of Inglewood had an estimated permanent population of 117,789 persons and approximately 36,806 residences in 2005. By the year 2015 SCAG forecasts an increase to 120,185 persons (a 2 percent increase) and 38,149 residences (a 3.6 percent increase) for the City of Inglewood.¹ According to the Economic Conditions and Trends study prepared for the City of Inglewood General Plan Update, the population and housing inventory increased to 118,164 persons and the number of occupied dwelling units decreased to 36,724 as of 2006.² However, housing data reported by the California Department of Finance on January 1, 2008 indicates there are currently 38,969 households in the City. Thus, the current

¹ SCAG Regional Transportation Plan (RTP) Growth Forecast 2008.

² Stanley R. Hoffman Associates, Inc., April 20, 2006.

number of households in the City already exceeds the 2015 projections. Currently, the Proposed Project Site does not contain any residential or dwelling units and, therefore, has no permanent resident population. However, the Project Site contains over 600 rooms within the barns in the Stable Area at Hollywood Park. These rooms are assigned to the various trainers who have applied for and received stall space at Hollywood Park for the race meetings and advanced training periods. The allocation of the rooms is based on a ratio to the number of stalls allotted to each trainer. The rooms are used at the trainers' discretion as either offices, tack rooms (for the storage of saddles, bridles and other equine related equipment) and/or sleeping rooms for casual laborers who care for the horses stabled on-site and are employed by the trainers or horse owners. The rooms do not contain kitchens or kitchenettes, separate bathrooms or other amenities common to residential dwelling units. Bathroom facilities are communal and located in an area separate from the rooms.

The Project Site is currently developed with Hollywood Park Racetrack and Turf Club, Casino and associated surface parking lots. Table IV.H-1 provides City of Inglewood population and housing projections for 2005-2020 by census tract. The Project Site is located within Census Tract 600702. A map of the City of Inglewood with each census tract is provided in Figure IV.H-1.

Employment

Based on SCAG's Regional Transportation Plan Growth Forecast data (RTP, 2008) the City of Inglewood provided an estimated 32,683 jobs in 2005. Employment is anticipated to increase by 1,644 jobs to 34,327 jobs by 2015. The City's labor force is generally characterized by sales and office (30.7%), management and professional (24.7%), service (20.5%), production, transportation and material move (16.3%), and other (7.9%).³ As a result of faster population growth relative to employment growth, the jobs-housing ratio in Inglewood in 2000 decreased slightly.

The Hollywood Park Racetrack and Casino currently supports approximately 3,202 jobs on the Project Site.⁴ The Casino operations generate approximately 1,017 jobs. There are approximately 2,185 jobs associated with the Hollywood Park Racetrack including approximately 1,259 full-time jobs and approximately 926 part-time/seasonal jobs, which equates to 342 full-time equivalent jobs (FTE). The total full-time and FTE jobs currently on the Project Site is 2,618.

Local Planning Policies and Programs

Development within the Project Site is governed by several local and regional plans. The General Plan of the City of Inglewood, adopted in 1989, consists of eight elements; Land Use, Safety, Noise, Open Space, Conservation, Circulation, and Housing. The City of Inglewood Land Use Element provides general guidance on land use issues and planning policy for the entire City. The Housing Element of the City of

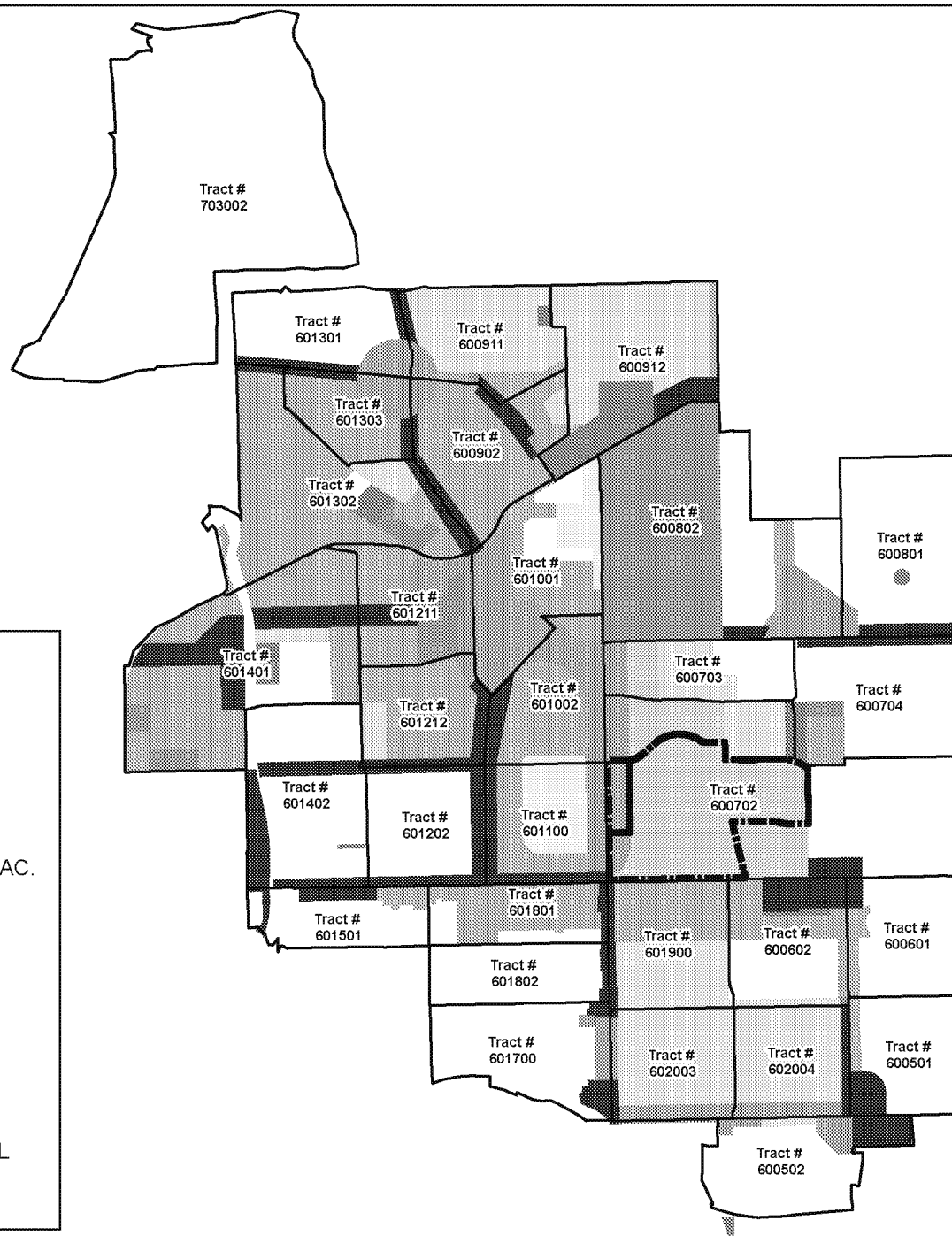
³ *City of Inglewood General Plan Update Technical Background Report: 2.3 Economic Trends and Conditions, 2006.*

⁴ *Hollywood Park Land Company, June 2007.*



Table IV.H-1
SCAG's 2008 RTP Population & Housing Projections for the City of Inglewood 2005-2020

Census Tract	Zoning Designation	GP Designation	Year 2005			Year 2010			Year 2015			Year 2020		
			Pop.	DU	Average Hsld.	Pop.	DU	Average Hsld.	Pop.	DU	Average Hsld.	Pop.	DU	Average Hsld. Size
600501	R1, CS, R3	LD, C, MD	2,759	925	2.98	2,775	934	2.97	2,816	956	2.95	2,828	969	2.92
600502	R1, CS, R2, R3, C3	LD, C, C/Res, LMD	2,398	677	3.54	2,413	684	3.53	2,449	698	3.51	2,459	707	3.48
600601	R1, R3, R2, C2, C3	LD, MD, C	2,724	964	2.83	2,740	974	2.81	2,780	997	2.79	2,792	1,011	2.76
600602	R1, R3, C2, MIL, OS, R2	LD, C, I, MD, OS, LMD	3,432	895	3.83	3,454	906	3.81	3,511	932	3.77	3,526	948	3.72
600702	CR, R1, R2, OS, C3, CS	C/Rec, LD, C/Res, LMD, C, OS	3,115	1,026	3.04	3,134	1,037	3.02	3,184	1,064	2.99	3,198	1,079	2.96
600703	CR, R1, R3	LD, LMD, C/Rec, C/Res	1,935	944	2.04	1,948	956	2.03	1,982	985	2.01	1,992	1,002	1.92
600704	R1, C2, OS, R3, R-1.5, C3	LD, LMD, C, OS, P/SP	3,155	1,265	2.49	3,176	1,282	2.48	3,232	1,320	2.44	3,248	1,343	2.42
600801	R1, CS, R2, R3, OS, C3	LD, C, C/Res, OS	3,328	1,231	2.70	3,346	1,242	2.69	3,391	1,270	2.67	3,403	1,286	2.65
600802	S2, R1, S1, R3, C3, R2	P/PS, LD, C/Res, LMD, C	2,879	1,148	2.51	2,897	1,160	2.50	2,942	1,190	2.47	2,955	1,208	2.45
600902	R3, M1, C3, C2, R2	LMD, I, C, LD, C/Res	7,424	2,537	2.93	7,467	2,565	2.91	7,574	2,631	2.88	7,605	2,670	2.85
600911	R2A, R3, R2, OS, C3	LMD, MD, C/Res, C, OS, P/SP	3,757	1,127	3.33	3,780	1,138	3.32	3,834	1,163	3.30	3,851	1,179	3.27
600912	R2A, OS, R3, C3,	LMD, OS, C, MD	5,894	1,494	3.95	5,927	1,509	3.93	6,011	1,543	3.90	6,035	1,564	3.86
601001	C1, RM, R1, R3, R2, OS, P1	C/Res, MD, H, LD	2,300	1,172	1.96	2,316	1,187	1.95	2,354	1,223	1.92	2,365	1,244	1.90
601002	R3, CS, C2, C3	MD, C/Res, C, H	5,703	2,022	2.82	5,735	2,044	2.81	5,818	2,095	2.78	5,842	2,126	2.75
601100	R3, RM, C2A, CS, P1	H, MD, C, C/Res	6,776	1,942	3.49	6,815	1,963	3.47	6,912	2,014	3.43	6,940	2,043	3.40
601202	R1, CS, P1, C2A, R3, R2	LD, C	4,466	1,056	4.23	4,492	1,067	4.21	4,558	1,092	4.17	4,577	1,107	4.13
601211	CC, R4, C1, C2, P1, OS	MD, P/PS, C/Res, I, C	3,032	1,106	2.74	3,050	1,118	2.73	3,095	1,146	2.70	3,109	1,163	2.67
601212	CC, R4, C1, C2,	LMD, MD, C/Res.	6,796	2,007	3.39	6,834	2,028	3.37	6,932	2,078	3.34	6,960	2,108	3.30











Census Tract	Zoning Designation	GP Designation	Year 2005			Year 2010			Year 2015			Year 2020		
			Pop.	DU	Average Hsld. Size	Pop.	DU	Ave. Hsld. Size	Pop.	DU	Ave. Hsld. Size	Pop.	DU	Ave. Hsld. Size
601301	R1, C2, C3, R3	LD, C, C/Res	2,023	779	2.60	2,034	787	2.58	2,064	805	2.56	2,072	815	2.54
601302	R3, M1, OS, CC, C3, RM	MD, I, LD, LMD, P/SP, OS	7,379	2,879	2.56	7,414	2,910	2.55	7,506	2,982	2.52	7,533	3,025	2.49
601303	R3, C2, C3, P1	MD, C/Res, C	5,379	2,119	2.54	5,409	2,142	2.53	5,487	2,196	2.5	5,509	2,228	2.47
601401	M1, R2, R4, C3, P1, R3, OS	I, C, MD, P/PS, OS, LMD, C/Res	5,207	1,507	3.46	5,228	1,522	3.43	5,274	1,558	3.39	5,291	1,578	3.35
601402	R2, R1, R3, CS, OS	LD, C, OS	5,612	1,372	4.09	5,642	1,385	4.07	5,721	1,418	4.03	5,743	1,437	4.0
601900	R2, M1L, C2A, C3	LMD, I	6,622	1,409	4.70	6,662	1,425	4.68	6,765	1,462	4.63	6,794	1,484	4.58
602003	R2, C2A, C3, OS	LMD, C/Res, C	5,233	1,215	4.31	5,264	1,227	4.29	5,344	1,258	4.25	5,367	1,276	4.21
602004	R2, C2A, C3	LMD, C/Res, C	4,146	1,029	4.03	4,171	1,040	4.01	4,234	1,065	3.98	4,252	1,081	3.93
Lennox Tracts/Outside City Boundaries^a														
703002	R1	LD	333	104	3.20	334	105	3.18	336	106	3.17	337	107	3.15
601501	C2A, P1, R-2, Lennox	C, I, Lennox	410	109	3.76	412	111	3.71	416	118	3.53	417	122	3.42
601700	C2A, R3, Lennox	C, C/Res, Lennox	770	185	4.16	774	187	4.14	785	192	4.09	788	195	4.04
601801	R3, R2, C2A, CS, C3, Lennox	I, Lennox	2,619	531	4.93	2,638	539	4.89	2,685	557	4.82	2,698	568	4.75
601802	C2A, Lennox	C, Lennox	170	30	5.67	173	31	5.58	179	33	5.42	181	34	5.32
City Total			117,789	36,806	3.38	118,466	37,205	3.36	120,185	38,149	3.32	120,678	38,708	3.28
Notes: ^a Census Tracts 703002, 601501, 601700, 601801, and 601802 include areas that are located partially within the City of Inglewood and partially outside of the City's boundaries. While the data for the entire tract is reported, the subtotal for the City of Inglewood is reported separately. Because of this, the sum of the columns do not equal the total amounts reported for the City Total. Source: SCAG Regional Transportation Plan (RTP) 2008.														

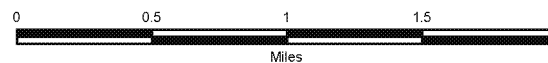


Legend

-  Census Tracts
-  Project Site

General Plan

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



Inglewood General Plan (2000), which was adopted by the California Department of Housing and Community Development (HCD) in 2005, provides additional guidance on housing and economic development issues against which potential development must be considered.

Projected housing needs are incorporated into housing policy and programs intended to produce housing opportunities for all residents of the community, consistent with the identified housing projections.

City of Inglewood 2000 Housing Element

The principal purpose of the City's Housing Element is to promote housing affordability and availability as well as promote development and redevelopment while preserving existing housing stock within the City. The general housing goal for the City of Inglewood is to provide each resident with decent and affordable housing. The Housing Element goals and objectives for housing are to:

- Promote the maintenance, rehabilitation, and modernization of existing housing stock through public awareness, grants, loans, rebates and code enforcement;
- Meet the increasing demand for affordable housing for low and moderate-income persons;
- Ensure that housing in the City adequately addresses the special physical requirements and economic needs of the handicapped, elderly, and homeless;
- Relieve overcrowded housing conditions through the efficient use of underutilized land, rent subsidies, promoting the construction of additional housing, and revising zoning standards;
- Protect the rights of persons to obtain housing and to provide assistance to those persons faced with displacement from their homes;
- Reduce adverse impacts of aircraft noise in residential areas;
- Create and amend zoning standards to stimulate new residential development; and
- Create sites for housing and to assist in their development.

According to the City of Inglewood's 2000 Housing Element, the City's housing inventory is relatively old, which is becoming a growing problem as many housing units are deteriorating and becoming dilapidated in the later stages of their physical life span. The 2000 U.S. Census estimates that within the City of Inglewood, 53.8% of housing units are 40 years or older, with 12.3% of all units 60+ years in age. Additionally, only 0.9% of units are under 10 years of age, with 13.6% under 20 years.⁵

⁵ 2000 Housing Element, City of Inglewood, pp. 18-19.

As discussed in the Housing Element, households in Inglewood from 1980 to 1990 were characterized by an increase of younger families as well as an increase in the number of children in these families. The majority of families in the City could be classified as low- to moderate-income, with 47% of households having incomes below 80% of the County median.⁶ The 2000 Census reported that from 1993 to 2000 there was a net increase of only nine dwelling units in the City of Inglewood. However, it should be noted that since that time there have been additional units added in the City, for example, the Renaissance development (approximately 395 units). Additionally, the 2000 Census reported that 65% of units within the City of Inglewood were renter-occupied, and 35% of units were owner-occupied.⁷

City of Inglewood Redevelopment Agency and the Merged Redevelopment Plan

The City of Inglewood Redevelopment Agency adopted six redevelopment projects over a 23-year period. On July 16, 1996 the City Council merged the six redevelopment projects (the “Merged Redevelopment Project”), and amended and restated the existing redevelopment plans by adopting one redevelopment plan applicable to all six merged redevelopment projects (individually, a “Constituent Redevelopment Project Area”) known as the “Amended and Restated Redevelopment Plan for the Merged In Town, La Cienega, Manchester-Prairie, North Inglewood Industrial Park, Century, and Imperial-Prairie Redevelopment Projects.” The Project Site is located within two Constituent Redevelopment Project Areas. The Project Site is predominately incorporated within the Century Constituent Redevelopment Project Area, which is generally bounded by Manchester Boulevard to the north, Crenshaw Boulevard to the east, 102nd Street to the south, and Prairie Avenue to the west. The Century Constituent Redevelopment Project Area was established in 1981, encompasses approximately 483 acres of land and contains residential, commercial/retail, and industrial land uses. Portions of the Project Site also are within the Manchester-Prairie Constituent Redevelopment Project Area, which is generally bounded by Manchester Boulevard to the north, Prairie Avenue to the east Hardy Street to the south, and Myrtle and Larch Streets to the west. Established in 1972, the Manchester-Prairie Constituent Redevelopment Project Area encompasses approximately 200 acres of land containing residential, commercial, and institutional land uses. The Manchester-Prairie Constituent Redevelopment Project Area includes portions of the Project Site east of Prairie Avenue. The portion of the Project Site within the Manchester-Prairie Constituent Redevelopment Project Area is currently developed with a surface parking lot.

The Redevelopment Plan for the Merged Redevelopment Project Area provides goals and objectives to provide direction and a course of future action for the City of Inglewood. The goals and objectives set forth in the Redevelopment Plan include the following: 1) eliminate blighted areas to promote new development and 2) enhance private sector investment within the Constituent Project Areas.⁸

⁶ *Ibid.*

⁷ 2000 Housing Element, City of Inglewood, pp. 9-13.

⁸ City of Inglewood General Plan Update: Technical Background Report 2.1-2.4, 2006.

Regional Planning Policies and Programs

Regional Housing Needs Assessment

The Regional Housing Needs Assessment (RHNA) is mandated by State Housing Law as part of the periodic process of updating local housing elements of the General Plan. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods. The current planning period in the Final 2007 RHNA is January 1, 2006 to June 30, 2014. Communities use the RHNA in land use planning, prioritizing local resource allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment and household growth. The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that collectively the region and subregion can grow in ways that enhance quality of life, improve access to jobs, promotes transportation mobility, and addresses social equity and fair share housing needs. The RHNA consists of two measurements of housing need: (1) existing need, and (2) future need.

The existing need assessment simply examines key variables from the most recent Census to measure ways in which the housing market is not meeting the needs of current residents. These variables include the number of low-income households paying more than 30% of their income for housing, as well as severe overcrowding, farm worker needs and housing preservation needs.

The future need for housing is determined primarily by the forecasted growth in households in a community. Each new household, created by a child moving out of a parent's home, by a family moving to a community for employment, and so forth, creates the need for a housing unit. The anticipated housing needed for new households is then adjusted to account for an ideal level of vacancy needed to promote housing choice, moderate cost increase, avoid the concentration of lower income households and to provide for replacement housing. The RHNA quantifies the need for housing by income group within each jurisdiction during specified planning periods.

The Final 2007 RHNA determined that Inglewood currently needs to provide a total of 1,658 new housing units, and of these 653 needed to be affordable units for low and very low income households in order to satisfy the City's share of these regional housing needs for the current planning period.⁹ Table IV.H-2 provides the projected housing needs by income level within the City of Inglewood.

⁹ Final RHNA Allocation adopted by SCAG Regional Council 7/12/07 and transmitted to HCD 7/13/07, website: http://www.scag.ca.gov/Housing/pdfs/rhna/RHNA_FinalAllocationPlan071207.pdf

Table IV.H-2
SCAG's 2007 Final Regional Housing Needs Assessment for the City of Inglewood

Income Category	Housing Unit Construction Need (Adopted 7/13/07)
Very Low Income	398 (24%)
Low Income	255 (15.4%)
Moderate Income	278 (16.8%)
Above Moderate Income	727 (43.8%)
Total	1,658 (100%)
<i>Source: Final RHNA Allocation adopted by SCAG Regional Council 7/12/07</i>	

Regional Comprehensive Plan and Guide

The Regional Comprehensive Plan and Guide (RCPG) was adopted in 1994 (amended in 1996) by the member agencies of SCAG to set broad goals for the southern California region and identify strategies for agencies at all levels of government to use in guiding their decision-making. It includes input from each of the 14 subregions that make up the Southern California region (comprised of 6 Counties: Los Angeles, Orange, San Bernardino, Riverside, Imperial and Ventura Counties). The proposed Hollywood Park Redevelopment Project Site is located within the SBCCOG subregion.

Adopted policies included in SCAG's RCPG (1996) that are related to land use are contained primarily in the Growth Management Chapter. The goals of the RCPG include managed growth which attracts business and capital investments to the region, opens opportunities for jobs, housing, and education helps attain mobility and air quality goals, and maintain quality of life.¹⁰

The Housing Chapter of the RCPG is non-mandated and does not establish any specific requirements for local governments. However, SCAG is responsible for assisting cities and counties in fulfilling their statutory obligations to prepare and regularly update the Housing Elements of their General Plans. The Housing Chapter of the RCPG is intended to provide the broad picture of housing issues affecting the region to assist local governments in meeting this requirement. The goals of the Housing chapter promote the goals of the RCPG which identifies housing concerns for the region. The regional housing goals in the RCPG include:

- Decent and affordable housing choices for all people;
- Adequate supply and availability of housing;
- Housing stock maintenance and preservation; and

¹⁰ SCAG RCPG Growth Management Chapter, website: <http://www.scag.ca.gov/rcp/pdf/pastprojects/1996RCPGrowthManagementChapter.pdf>, accessed July 27, 2006.

- Promote a mix of housing opportunities region wide.

By providing a regional framework for local housing strategies that are responsive to market area needs and state mandates, the Housing Chapter is a major tool for coordinating local housing development strategies within Southern California. It also includes a set of principles and policies associated with increasing the supply of housing in the region, particularly housing that is affordable to low- and moderate-income households.¹¹

Subregional Policy

The Proposed Project is located in the City of Inglewood, which is a member of SCAG's South Bay Cities Council of Governments (SBCCOG) subregion. The SBCCOG seeks to provide subregional input to the RCPG developed by SCAG. In order to work towards implementing SCAG's policies and to support the specific needs and characteristics of the subregion, SBCCOG has developed a strategy and guide for the 16 member cities of the subregion. The South Bay Strategy has similar broadly defined goals and policies to the RCPG, and strives to enhance the quality of life in the region by promoting a healthy and environmentally sound quality of life, equity, and sustainable patterns of development. The strategy does not have any legal standing or status under the California Government Code.¹²

The South Bay Strategy is a document which explores possibilities and potential courses of action for the South Bay Cities acting together. Land use and housing goals in 2006 for the SBCCOG include:

- Supporting incentives for well-planned mixed-use development and affordable housing;
- Supporting legislation that streamlines the environmental review process for mixed-use infill development;
- Supporting funding and incentives for programs that promote locating services and facilities locally, reducing the need to travel;
- Supporting revisions to the RHNA and Housing Element processes which take into consideration more local government input; and
- Supporting legislation which establishes funding and incentives for programs which encourage walking, biking, transit and other alternative forms of transportation to serve local needs.

¹¹ SCAG RCPG Housing Chapter, website: http://www.scag.ca.gov/rcp/pdf/pastprojects/1996RCPG_HousingChapter.pdf, accessed July 27, 2006.

¹² South Bay Cities Council of Governments, website: <http://www.southbaycities.org>, accessed July 27, 2006.

SCAG's Compass Growth Vision Strategy

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

- Putting new employment centers and new neighborhoods near major transit systems so that people can have transportation choices other than their cars;
- Designing safe, attractive transit centers and plazas that people enjoy using; and
- Creating mini-communities around transit stations, with small businesses, urban housing and restaurants all within an easy walk.

ENVIRONMENTAL IMPACTS

Methodology

Consistency with goals/expectations set forth in regional and City of Inglewood plans is determined through review of the applicable local and regional planning documents and policies. Applicable population- and housing-related planning documents include the SCAG's RCPG, RHNA, the Housing Element of the City of Inglewood General Plan, and the Redevelopment Plan for the Merged Redevelopment Project Area.

Thresholds of Significance

Appendix G to the State CEQA Guidelines provides sample checklist questions to assist lead agencies in determining the impacts of a Proposed Project. The following checklist questions address potential impacts upon population and housing projections:

- (a) Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
- (b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?
- (c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Impacts Determined to be Less Than Significant

The Proposed Project would not result in any significant environmental impacts related to threshold items (b) and (c), above. Implementation of the Proposed Project would not result in displacement of people and housing and would not require the construction of replacement housing elsewhere.

Redevelopment of the Project Site would eliminate the 600 rooms that function as offices, tack rooms, and/or dormitory-type sleeping quarters. The loss of these sleeping quarters would not result in any effective loss in the supply of housing because: 1) the sleeping quarters do not constitute “dwellings” or “dwelling units” under the IMC,¹³ and 2) without the racetrack operations, there would be no demand for the sleeping quarters that would be lost, as the quarters are only utilized by racetrack workers in order to keep them close to the racehorses. The loss of the sleeping quarters paired with the cessation of racetrack operations would therefore not result in any effective loss in the supply of housing for the City as a whole. As a matter of general operations, the Hollywood Park Stable Area is closed for approximately seven weeks every other year during the period of the Del Mar race meeting. During those closures the stable area is vacant. During this period the horses and their caretakers relocate to other stabling accommodations in the region. Therefore, the loss of the on-site sleeping quarters and the displacement of the casual laborers who reside with the horses would be less than significant.

Project Impacts

Construction Impacts

The Proposed Project would generate temporary employment opportunities during the Project’s construction phase. It is estimated that over 17,105 construction-related jobs would be generated over the buildout and stabilization horizon of the Proposed Project. This estimate includes 9,203 direct jobs, 3,274 indirect jobs, and 4,628 induced jobs.¹⁴

Construction-related jobs generated by the Proposed Project would likely be filled by employees within the construction industry within the City of Inglewood and the greater Los Angeles County region. In 2004 there were approximately 140,813 construction-related jobs within Los Angeles County. Of those jobs, approximately 470 (or 0.003%) were based within the City of Inglewood.¹⁵ Construction industry jobs generally have no regular place of business. Rather, construction workers commute to job sites

¹³ IMC Section 12-1.35 defines a “dwelling” as a building or portion thereof designed for or occupied exclusively for residential purposes, including one-family, two-family and multiple dwellings, but not including hotels, boarding and lodging houses. IMC Section 12-1.39 defines a “dwelling unit” as two or more rooms in a dwelling or apartment hotel designed for or occupied by one family for living or sleeping purposes and having only one kitchen. The dormitory-type sleeping quarters for the casual laborers do not fall under either definition since the sleeping quarters are temporary and seasonal living quarters associated with laborers in the horseracing industry and do not function as housing units in the traditional sense. The sleeping quarters do not contain kitchens, or individual bathrooms in each room, and are more akin to rooms in a boarding house.

¹⁴ Hamilton, Rabinovitz & Alshuler, Inc., April 18, 2007.

¹⁵ City of Inglewood General Plan Update: Technical Background Report, Chapter 2, Table 2.3-1, 2006.

throughout a given region that may change several times a year. Additionally, many construction workers are highly specialized (i.e., crane operators, steel workers, masons, etc.) and move from job site to job site within the region as dictated by the demand for their specific skills. The work requirements of most construction projects are also highly specialized and workers are employed on a job site only as long as their skills are needed to complete a particular phase of the construction process. For these reasons, employment opportunities associated with construction of the Proposed Project would not likely result in any measurable relocation of construction worker households to the vicinity of the Project Site. Indirect impacts upon regional population and housing conditions would therefore be less than significant.

Operational Impacts

Employment Displacement Impacts

California Horse Racing Industry Environment¹⁶

The Proposed Project would eliminate horse racing at the Hollywood Park Racetrack. If horse racing ceases at Hollywood Park, there would be movement and/or loss of some jobs affiliated with Hollywood Park. However, the loss of horse racing employment opportunities on the Project Site should be considered in the broader context of the horse racing industry in California. Horse racing 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 horse racing industry. (See Table IV.H-3)

Recreation and Horse Racing-related Employment

Upon cessation of horse racing, one or more of the following scenarios would occur:

- 1) Transferring Hollywood Park racing dates to other California race tracks, such as Del Mar, Santa Anita or various county fairgrounds;
- 2) Decreasing the number of overall race dates in California;
- 3) Utilizing private barns.

Generally, it should be noted that if current trends continue, the demand for barns to stable horses will decrease as the California horse racing industry continues to decline. The following paragraphs further discuss the potential impacts of these three scenarios.

¹⁶ For a more comprehensive discussion of the decline in the California horseracing industry, see "The Future of Horseracing in California: Can the Industry Survive Without 'Racinos'?" by William G. Hamm, Ph.D. and Ronald H. Schmidt, Ph.D of LECG, LLC (a report commissioned by the City of San Mateo, CA to analyze the redevelopment of the Bay Meadows Race Track). (See Appendix H)

Table IV.H-3
Hollywood Park Simulcast Meet Handle and Attendance
for the Years 2002 through 2006 When No Live Racing

	2002	2003	2004	2005	2006	Change 2002-2006
Average Daily Handle (1):						
Santa Anita	1,121,345	\$1,011,848	\$ 940,544	\$859,376	\$870,301	-22.39%
Del Mar	1,060,431	985,793	907,518	891,044	824,703	-22.23%
Fairplex	579,987	619,956	562,588	595,509	576,231	-0.65%
Oak Tree	887,029	851,466	811,165	780,061	690,784	-22.12%
Average combined handle	1,014,926	937,777	874,993	829,155	804,410	-20.74%
Percentage change	-	-7.60%	-6.70%	-5.24%	-2.98%	
Average Daily Attendance (2):						
Santa Anita	4,310	3,861	3,786	3,392	3,159	-26.69%
Del Mar	4,192	3,997	3,828	3,457	3,035	-27.59%
Fairplex	2,643	2,627	2,448	2,343	2,105	-20.36%
Oak Tree	3,640	3,560	3,190	2,968	2,566	-29.51%
Average combined attendance	4,007	3,717	3,573	3,238	2,940	-26.62%
Percentage change	-	-7.24%	-3.88%	-9.37%	-9.19%	
Notes: (1) Does not include handle from advance deposit wagering. (2) Includes casino floor and Finish Line Bar, as well as all pass admissions. Source: Hollywood Park Land Company, LLC, July 2007.						

Scenario 1: Transferring Racing Dates

If Hollywood Park ceases to operate as a horse racing facility, the California Horse Racing Board will likely decide to transfer Hollywood Park's racing days to other race tracks such as Del Mar, Santa Anita, Fairplex, or various county fairgrounds. Transferring Hollywood Park's racing days to other race tracks would lessen the effect of the loss of Hollywood Park horse racing with respect to the displacement of horses and related jobs. It should be noted that Hollywood Park, Del Mar, Santa Anita and Fairplex are currently bound by an off-site stabling agreement whereby the horse racing tracks agree to make available additional horse stalls beyond their current use in exchange for reimbursement of the increase in incremental costs arising from stabling additional horses. Under California Business and Professions Code Section 19605 *et seq.*, the reimbursement funds come from a percentage of the amounts wagered at satellite wagering facilities that would otherwise be distributed as commissions, purses and owners' premiums. If Hollywood Park closes and the racing dates are transferred, many of the displaced horses could be stabled at Del Mar, for example, and thus Del Mar would be entitled to receive reimbursement for its incremental expenses associated with stabling the horses. Under current practices, Hollywood Park closes its barn area every other year for approximately six weeks for maintenance. During this period, the Hollywood Park horses are stabled at other locations including Del Mar, which demonstrates that there is significant capacity in Southern California for the current horse population. In addition, the current horse population and capacities in Southern California are summarized in Table IV.H-4.

Table IV.H-4
Summary of Horse Stall Occupancy for Southern California Racing Facilities

Facility Name	Number of Stalls ^a	Current Occupancy ^b
Hollywood Park	1,950	1,850
Del Mar ^c	2,100	0
Santa Anita	1,950	1,500
Fairplex	1,300	500
San Louis Rey Downs	500	450
TOTAL	7,800	4,300
<i>Notes</i> ^a Information gathered from California Horse Racing Board racing applications. ^b Provided by Nancy Uri, Stall Superintendent of Hollywood Park. ^c Del Mar traditionally only opens its stable area during its live race meet. Source: Hollywood Park Land Company, May 2007.		

Although transferring Hollywood Park's racing days to other facilities would result in the displacement of horses and the jobs associated with the horses at Hollywood Park, many of the jobs at Hollywood Park would transfer with the racing days to other facilities. As more fully discussed in this Section in connection with the discussion of Employment Generation, if Hollywood Park's racing days move to other facilities, many of the Seasonal/Part Time Jobs and many of the Casual Laborer jobs would be expected to move with the racing dates to the other facilities. Thus, the loss of many of the Seasonal/Part Time jobs and many of the Casual Laborer jobs would not represent actual lost jobs. (For complete discussion and estimated numbers of lost jobs see discussion of Employment Generation Impacts in this Section.)

Scenario 2: Decreasing the Number of Race Dates

If Hollywood Park ceases to operate as a horse racing facility, the California Horse Racing Board could decide not to transfer Hollywood Park's racing days to other facilities. This decision would lead to fewer racing days in California.

If Hollywood Park ceases to operate and the California Horse Racing Board declines to transfer Hollywood Park's racing days to other facilities, then the actual job loss would be more than under Scenario 1. For a complete discussion and estimated numbers of lost jobs, see Table IV.H-5 and the discussion of Employment Generation Impacts in this Section. It should be noted that overall, even with the lost jobs, the net job generation of the project is positive.

If Hollywood Park ceases to operate and the California Horse Racing Board declines to transfer Hollywood Park's racing days to other California facilities, it is possible that other states will capitalize on the decrease in horse racing in California by increasing the number of racing days, or having more horses in each race. Under this scenario, it is possible that many of the jobs would then follow the racing dates and the race horses to existing out of state facilities and, thus, not represent actual lost jobs.

Table IV.H-5
Summary of Existing Employment and Proposed Net Employment Generation

Land Use	Full Time	[Seasonal/ Part Time] FTE^a	Total (Full Time +FTE)
Existing Uses^b			
Hollywood Park Racetrack			
Racing Association Related Employees	374	[522] 193	567
Casual Laborers	885	[404] 149	1,034
Subtotal Hollywood Park Racetrack	1,259	[926] 342	1,601
Hollywood Park Casino	--	--	1,017
Subtotal Existing Jobs			2,618
Proposed Project			
Land Use	Size	Generation Rate^c	Total
Residential^d	2,995 du	0.13/du ^e	389
Retail	620,000 sf	1.87/1,000 sf	1,159
Commercial/Office	75,000 sf	3.51/1,000 sf	263
Casino^f	--	--	1,017
Hotel (300 rooms)^g	210,000 sf	1.13/1,000 sf	237
Meeting Space	20,000 sf	3.51/1,000 sf	70
Subtotal Proposed Employment Generation			3,135
Net Total (Proposed less Existing)			+517
Notes: ^a Hollywood Park Land Company, LLC, based on the 2007 budget. The FTE calculation is based on a standard 8 hour work day, 52 work week year. In 2007 there were 96 live race days. ^b Existing employment data provided by Hollywood Park Racing Association. ^c City of Inglewood 2006 Developer Fee Justification Study and School Facilities Fees Needs Analysis. ^d The residential land use includes a 10,000 square foot HOA Recreational Facility. ^e Residential Job Generation Study, RRC Associates and the Housing Collaborative (December 2000). ^f The estimated number of future casino employees was provided by the Hollywood Park Land Company. ^g Each hotel rooms assumed to be 700 sf. Source: Hollywood Park Land Company and Christopher A. Joseph & Associates, April 2007.			

Scenario 3: Utilizing Private Barns

If Hollywood Park ceases to operate as a horse racing facility, the displaced horses could be stabled in private barns. There are currently listed in the California Horseman's Directory, approximately 70 private barns in the State that board horses. Not all facilities are listed in the directory so there are likely more available. If Hollywood Park closes its barns, some of the displaced horses could be stabled in these existing private barns throughout California.

If Hollywood Park ceases to operate and many of the displaced horses are stabled at private barns, then the actual job loss would be likely be more significant than if the displaced horses were housed at other racing facilities (i.e., Scenario 1). However, if horses were housed at private barns for portions of the year but moved to racing facilities for race days, then many of the Seasonal/Part Time jobs and Casual Laborer jobs would again move with the horses to the racing facilities and, thus, not represent actual job loss. For a complete discussion and estimated numbers of lost jobs, see the discussion of Employment Generation Impacts in this Section. It should be noted that overall, even with the lost jobs, the net job generation of the project is positive.

Employment Generation Impacts

Direct Employment Growth

Employment generated by the Proposed Project is analyzed to determine if the growth would induce substantial daytime population growth in the City that would exceed projected or planned for levels of employment growth in the City. Table IV.H-5 compares existing jobs at the Project Site to the job generation likely to be created by the Proposed Project. The existing jobs at the Hollywood Park Racetrack include full time employees as well as seasonal/part time employees. In order to provide a conservative analysis of net job generation, Seasonal/Part Time employees and Casual Laborers have been included as potentially lost jobs when the existing facility closes. This would be the case if the racing dates at Hollywood Park are not reallocated to another venue such as Santa Anita or Del Mar.

As summarized in Table IV.H-5, the proposed commercial office, retail/entertainment, casino/gaming, hotel and residential land uses are estimated to generate approximately 3,135 jobs. This estimate includes the retention of approximately 1,017 existing Casino-related jobs, as the Casino will be renovated at its existing location and incorporated into the Proposed Project. When compared to the displacement of the 1,601 full-time equivalent (FTE) existing jobs associated with the current horseracing operations on the property, the Proposed Project would result in a net increase of 517 FTE jobs. Based on SCAG forecasts (RTP 2008), employment is anticipated to increase by 1,644 employees within the City of Inglewood by 2015, rising from 32,683 employees in 2005 to 34,327 employees in 2015. Therefore, the Project's anticipated employment generation of 517 net new jobs (FTE) would be consistent with local employment forecasts and would thus be considered less than significant.

However, in reality many of these Seasonal/Part Time jobs and all of these Casual Laborer jobs do not represent actual lost jobs on a regional basis because they have historically moved with the racing dates to other venues (for example Santa Anita and Del Mar) and will continue to move to new venues if Hollywood Park's racing dates are moved to other local tracks. For example, approximately 330 Racing Association Related Seasonal/Part Time employees (including much of the catering staff, television staff, racing staff, admissions and parking staff, janitorial staff and mutuels), have historically moved from Hollywood Park to follow the racing dates at other venues.¹⁷ Likewise, these 330 Racing Association Related Seasonal/Part Time jobs could move to other venues when the Hollywood Park facility

¹⁷ Estimated numbers provided by Hollywood Park Land Company.

permanently closes and if Hollywood Park's racing dates are given to another venue (for example Santa Anita and Del Mar). Similarly, both full-time and part-time Casual Laborer jobs (such as grooms, exercise riders, pony boys, jockeys, trainers, assistant trainers & foremen, farriers, veterinarians and hot walkers) would move to other venues if Hollywood Park permanently closes and if the horses/horse racing dates move to other venues.

Indirect Employment Growth

The increase in on-site employment generated by the commercial uses of the Project would generate indirect population and housing growth if households relocate from communities outside the southern California region to be closer to their place of employment. Employment opportunities typically associated with commercial office, hotel and retail/entertainment uses would not likely result in substantial permanent population growth or associated housing demands. Retail- and service-oriented commercial employment opportunities are typically filled by the local population base. As such, it is anticipated that the employment opportunities generated by the Proposed Project would be filled by existing residents within the City of Inglewood and other nearby areas in the region. Furthermore, due to the mixed-use character of the proposed land uses, the Proposed Project would encourage a live-work environment where people could live and work within the Hollywood Park development. In any event, the employment opportunities generated by the Proposed Project are not as substantial as to induce substantial indirect population growth by attracting new residents who would relocate to the local region for purposes of seeking employment on the Project Site. Rather, by introducing housing in a jobs-rich area, the Project is expected to bring balance. For these reasons, indirect impacts to population and housing demographics generated by the new commercial office, retail and hotel uses of the Project would be less than significant.

Population and Housing

Resident Population Generation

The residential component of the Proposed Project will have a direct impact on housing and population demographics within the City of Inglewood, as the Project will create approximately 2,995 new residential dwelling units. Based on an average household size of 3.0 persons, the Proposed Project is estimated to generate approximately 8,985 permanent residents.¹⁸ This calculation of residents generated represents a conservative estimate for the Proposed Project because the residential product types contemplated for the Proposed Project are anticipated to generate a smaller average household size. As shown previously in Table IV.H-1, in 2005 the average household size for similarly developed housing tracts (i.e., Census Tracts 600703 and 600704) ranged from 2.04 to 2.49 persons per household. Census Tracts 600703 and 600704 represent similarly developed housing tracts because they include the Carlton

¹⁸ Based on an average household size of 3.0 persons per household. As shown in Table IV.H-1, the average household size for similarly developed housing tracts (i.e., Census Tracts 600703 and 600704) ranges from 2.04 to 2.49 persons per household. Census Tracts 600703 and 600704 include the Carlton Square housing development and the Briarwood housing development.

Square housing development and the Briarwood housing development, both of which include similar product types to the Proposed Project.

By comparison, the EIR for the nearby Playa Vista project assumed a household figure of 2.36 persons per household in that Community Plan Area. The household figures used in the EIR for the nearby Playa Vista project are relevant because the Playa Vista project has some similar product types, including owner-occupied units (e.g., townhomes, condominiums, attached product, etc.). These owner-occupied units tend to be smaller in size than traditional single family homes and, thus, attract more empty nesters, first time buyers without children and single professionals. Thus, this product type results in a smaller average household size than developments with more traditional single family product types.

Although the City average household size per the 2008 RTP for 2015 is 3.32, the use of 3.0 persons per household is a reasonable and conservative household projection for planning purposes because it exceeds the average household size for nearby similarly developed housing tracks (Census Tracts 600703 and 600704 which include the Carlton Square and Briarwood developments) and, likewise, is similar to household figures used in the Playa Vista project, which contains product types similar to the Proposed Project. Further, the 2008 RTP shows that the average household size is trending downward during the timeframe of the Project's buildout.

The following discussion includes an assessment of the Project's impact on local and regional population and housing projections.

Local Growth Forecasts

Housing

The Proposed Project will create a substantial benefit to the City and surrounding region by creating a significant amount of needed housing. Based on SCAG's current housing growth forecast data (RTP, 2008), the City of Inglewood is anticipated to experience a housing rate increase of 1,343 dwelling units for the City between the years 2005 to 2015, from 36,806 units in 2005 to 38,149 units in 2015. Development of the Proposed Project would add approximately 2,995 units to the City of Inglewood. As shown in Table IV.H-6, below, the housing data reported by the California Department of Finance currently indicates that the City of Inglewood has 38,969 households, which has already exceeded SCAG's projection for 2015 by 820 dwelling units. Thus, without a significant reduction in the number of existing dwelling units in the City, no new project that includes housing would be in compliance with the RTP 2008 growth forecasts for 2015 for the City. The Proposed Project will add an additional 2,995 dwelling units to the City's housing inventory, resulting in a total of 41,964 dwelling units by 2014. This increase would be inconsistent with the 2008 RTP, as the Proposed Project would exceed the City's 2015 growth projection by 3,815 dwelling units. However, it should be noted that the 2008 RTP did not anticipate the ability to add a substantial amount of housing growth in the City of Inglewood as the City is currently built out and has few remaining undeveloped parcels for new housing. Indeed, the City's Community Development Department requested that SCAG adjust its growth forecast model to give additional weight to: 1) jobs rich areas, 2) high housing costs, and 3) centers or mixed-use development

concept to address the issue of the jobs/housing imbalance it projected it would experience.¹⁹ As a result, the growth forecast and the housing allocated to Inglewood were adjusted downward. The NOP for the DEIR was not circulated to the public until November 1, 2007, whereas the Final 2007 RHNA allocation was adopted on July 12, 2007 and the drafting of the 2008 RTP was well underway. At the time, an infill residential development project was not anticipated.

**Table IV.H-6
Population and Housing Estimates**

	Existing (2008)^a	2015 Forecast^b	Existing Plus Project^c	Over/Under Projections
Housing				
SCAG Forecasts for the Inglewood Subregion	38,969	38,149	41,964	3,815
Population				
SCAG Forecasts for the Inglewood Subregion	118,878	120,185	127,863	7,678
^a 2008 estimates based on the California Department of Finance, Table E-5: Table 2: E-5 City/County Population and Housing Estimates, 1/1/2008. ^b Based on SCAG's RTP, 2008. ^c Based on an increase of 8,985 persons generated by the Proposed Project. (2,995 dwelling units multiplied by an average household size of 3.0 persons per unit.) Source: Christopher A. Joseph & Associates, July 2008.				

Despite this technical inconsistency between the Proposed Project and the regional housing growth specifically allocated to Inglewood, the Proposed Project nonetheless presents an opportunity to address the housing needs of the City and the surrounding region given the City's proximity to the South Bay and the Westside jobs markets, which are jobs-rich. With respect to addressing the City's housing needs, as discussed within the City's Housing Element, the City's housing inventory is relatively old, which is becoming a growing problem as many housing units are deteriorating and becoming dilapidated in the later stages of their physical life span. The Proposed Project's creation of 2,995 newly-constructed dwelling units presents an opportunity for the City to continue its efforts to add high-quality, new housing to its housing stock. Moreover, in the letter to SCAG requesting reconsideration of the housing allocated to Inglewood, the City notes that its current land use pattern shows that there are a significant number of smaller lots that do not have the potential to be developed with apartments or condominiums needed to achieve higher RHNA numbers. However, given the housing types proposed by the Project and the land use plan, the Project in fact supports the type of housing that make it possible for the City to achieve the growth that SCAG originally planned to allocate to the City. Also, the variety in the types of housing proposed and the mixed-use nature of the development address the City's request for SCAG to focus on high housing costs and the mixed-use development concept to address the issue of jobs/housing imbalance in the City.

¹⁹ Letter dated November 29, 2006 from the Inglewood Community Development Department to Southern California Association of Governments re: comments to the Integrated Growth Forecasts/ RHNA allocation assigned to the City of Inglewood.

With respect to regional housing needs, as previously noted, as a result of faster population growth relative to employment growth, the jobs-housing ratio in Inglewood in 2000 decreased slightly. However, the jobs-housing ratio for the entire South Bay region is projected to increase. As noted in the City's letter to SCAG requesting reconsideration of the growth allocated to Inglewood, the jobs/housing ratio for the entire South Bay is expected to increase from 1.48 in 2000 to 1.59 in 2030. Thus, on a regional basis, the region can support more housing given the level of jobs in the region. The Final 2007 RHNA indicates that the SBCCOG region needs to provide 13,733 housing units during the January 1, 2006 to June 30, 2014 planning period. The creation of housing by the Proposed Project is consistent with the goals of the broader region to locate housing in close proximity to jobs, although technically inconsistent with the specific growth amounts allocated to Inglewood. Furthermore, the Proposed Project will add housing in an area with policies geared to increase housing stock, and can be accommodated by existing utilities, public services, and roadway infrastructure without resulting in significant environmental impacts. However, notwithstanding the Proposed Project's consistency with the spirit and intent of the SCAG growth policy, given the Proposed Project's technical inconsistency with the housing growth projections for the City, although consistent with the region, the impacts related to housing growth would be considered a significant impact.

Population

Based on 2008 SCAG population projections, the City of Inglewood is anticipated to experience a population increase of 2,396 persons between the years of 2005 to 2015, from 117,789 persons in 2005 to 120,185 persons in 2015. According to recent statistics published by the State of California Department of Finance, the City of Inglewood's current (2008) population is estimated at 118,878 persons. As shown in Table IV.H-6, above, the proposed Hollywood Park Redevelopment Project would add approximately 8,985 persons to the City of Inglewood, which would increase the total population to 127,863 persons by 2014. The Proposed Project's population increase would not be consistent with the regional growth projections as the population growth generated by the Proposed Project would exceed the total anticipated growth for 2015 by 7,678 persons.

This inconsistency, however, is attributed to the fact that the City of Inglewood is built out and has few remaining undeveloped parcels available to accommodate future growth. The Proposed Project would redevelop an existing racetrack facility which would require an adoption of a Specific Plan and amendments to the City's General Plan and the Merged Redevelopment Plan, and a zone change. As the Proposed Project was not anticipated at the time SCAG prepared their 2008 RTP, the anticipated population and housing growth associated with the Proposed Project was not included within the 2008 RTP update. Nevertheless, the population growth anticipated by the Proposed Project would not result in a significant environmental impact, as the surrounding infrastructure would be able to accommodate the proposed development. As noted in Sections IV.F, Hydrology/Water Quality, IV.J, Public Utilities, IV.K, Public Services, and IV.L, Traffic/Transportation, with implementation of the Proposed Project Design Features and recommended mitigation measures, the existing local and regional infrastructure can accommodate the unanticipated growth of the project. However, due to the Proposed Project's technical inconsistency with the population growth projections for the City, impacts to population growth would be considered a significant impact.

Consistency with Regional and Local Plans and Policies

City of Inglewood Local Community Housing Goals and Policies

The Proposed Project would advance citywide community goals by contributing to the effort of bringing about new vitality, residential uses and employment in the Hollywood Park area, specifically within the Constituent Redevelopment Project Areas in the Merged Project Area. Such development would implement the City of Inglewood General Plan goals of providing housing and development of new dwelling units within buildings designated for commercial use and would not impact City housing policies. The Proposed Project would be consistent with City's General Plan and assist in reaching housing goals outlined in the City's Housing Element.

As previously discussed in this Section, one of the City's goals is to encourage homeownership. The 2000 Census reported that the percentage of renter-occupied versus owner-occupied housing in the City of Inglewood is 65% to 35%, respectively. The higher number of renter-occupied versus owner-occupied units is related to the City's supply of rental housing. Inglewood has accommodated and continues to accommodate a high proportion of renter-occupied households when compared to other nearby cities. By providing a significant amount of additional home ownership opportunities within the City, the Proposed Project would promote a balanced ratio of renter-occupied versus owner occupied housing opportunities within the City.

Community Redevelopment Agency Goals and Policies

The Proposed Project would be consistent with the goals of the Merged Redevelopment Plan by encouraging economic development through new commercial and residential opportunities and improving the quality of urban design. The Merged Redevelopment Plan designates the Project Site as an area to be redeveloped with residential and commercial/retail uses. The Project would fulfill this objective as it would eliminate blighted areas to promote new development and enhance private sector investment within the Merged Project Area by creating a live/work community by combining residential uses with commercial uses in an area characterized as job-rich.

As the Proposed Project would involve construction on a parcel that is currently developed, the recycling and redevelopment of the site would be consistent with the goals and objectives of the Century Constituent Redevelopment Project Area and the Manchester-Prairie Constituent Redevelopment Project Area. Furthermore, the development of the Proposed Project would develop new infrastructure eliminating the potential for blight, and would increase employment opportunities and housing availability for City residents, thereby increasing the productivity of the Project Site. Finally, as more fully discussed in the later portion of this section, the Proposed Project would sufficiently contribute to the redevelopment agency's 15% affordable housing goals through tax increment financing and the 20% set-aside requirement. Therefore the Proposed Project would not conflict with the goals of the Merged Project Area or the Century and Manchester-Prairie Constituent Redevelopment Project Areas.

Consistency with the Regional Comprehensive Plan and Guide

The Project would be consistent with policies set forth in the RCPG as the Project would: 1) encourage the use of existing urbanized areas accessible to transit through infill and redevelopment; 2) develop in an area requiring recycling and redevelopment; and 3) be located in an area that is generally developed, thereby preserving other open space areas.

Close proximity between jobs and housing reduces employee travel time and average vehicle trip length. The community at large benefits from reduced traffic and congestion, which in turn leads to reduced levels of noise, air pollution, and use of natural resources. However, this depends not only on the total number of jobs and housing units available in proximity to one another, it is also important that a wide range of jobs and housing units, both in type and cost, exists such that those who live in the housing are also employed in the nearby jobs. By having a strong linkage between jobs and housing, greater individual and group benefits may result. The Hollywood Park Redevelopment Project would generate an estimated 15,890 temporary construction jobs, approximately 3,135 full-time operational jobs and 2,995 housing units. The Proposed Project would provide jobs which could be filled by residents of the Project and/or the Hollywood Park area. The characteristics of these jobs (i.e., retail, commercial, hotel service) are not likely to attract many employees from surrounding cities and even fewer from other parts of the region to relocate to the City. It is expected that many of the Project employment opportunities could thus be captured by persons that live within the City, the Project Site area, or in close proximity.

In addition, the amount of employees moving to the Hollywood Park area or incurring long commutes is expected to be relatively small since the Project Site is located in close proximity to the jobs-rich Westside Los Angeles job market. Therefore, Hollywood Park Redevelopment Project would be consistent with the objective of reducing vehicle trips and vehicle miles traveled and the policies set forth in the RCPG.

SCAG and Regional Housing Needs Assessment (RHNA)

As previously discussed in this Chapter, the Final 2007 RHNA determined that Inglewood currently needs to provide a total of 1,658 new housing units, and of these 653 needed to be affordable units for low and very low income households in order to satisfy the City's share of these regional housing needs for the January 1, 2006 to June 30, 2014 planning period.²⁰ The Proposed Project will significantly contribute the regional housing needs and RHNA goals by providing up to 2,995 dwelling units, thereby more than satisfying the RHNA goal of creating 1,658 housing units within the City of Inglewood. Furthermore, the Proposed Project will contribute to the ability of the Redevelopment Agency to provide for affordable housing by providing tax increment financing (TIF). Community Redevelopment Law (Health & Safety Code Section 33000 *et seq.*) authorizes the use of property tax increments to pay for the indebtedness of redevelopment agencies. 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

²⁰ SCAG Regional Housing Needs Assessment: City of Inglewood Adopted RHNA Construction Need (Nov. '00), website: <http://api.ucla.edu/rhna/RegionalHousingNeedsAssessment/FinalNumbers/Frame.htm>.

transfers of property. Community Redevelopment Law also requires that 20% of the tax increments generated from a project area must be used by the Redevelopment Agency to increase and improve the community's supply of affordable housing for persons and families of low and moderate income (commonly referred to as the "20% set-aside"). (Health & Safety Code Section 33334.2(a).)

Through the 20% set-aside, the Proposed Project could generate sufficient funds to create 15% affordable units,²¹ or approximately 81% of the SCAG/RHNA goal of creating 653 affordable units. The 20% set-aside funds can be used in a variety of ways to address regional affordable housing needs including the following:

- Rehabilitation of existing affordable housing or Section 8 off-site units within the City of Inglewood;
- Purchase of long-term affordability covenants to restrict existing off-site affordable housing within the City of Inglewood to persons who qualify for affordable housing;
- Purchase of long-term affordability covenants to restrict existing off-site Section 8 housing which is scheduled to become market-rate housing, such that the former Section 8 housing could only be occupied by persons who meet the income requirements for affordable housing;
- Financial contributions, financing or other subsidies to assist development of off-site affordable housing;
- Subsidies to facilitate development of affordable housing on the Project Site or subsidies to make up the economic difference between market-rate and affordable housing on-site.

City of Inglewood 2000 Housing Element

The City's housing goals, as discussed in the City of Inglewood 2000 Housing Element, related to the adequate provision of housing opportunities available to all social and economic segments of the

²¹ As further discussed in Chapter IV.I Land Use, Community Redevelopment Law also requires that 15 percent of all new and substantially rehabilitated dwelling units developed within a project area be available to, and occupied by, persons and families of low or moderate income. (California Health & Safety Code Section 33413.) The Amended and Restated Redevelopment Plan for the Merged In Town, La Cienega, Manchester-Prairie, North Inglewood Industrial Park, Century, and Imperial-Prairie Redevelopment Projects, adopted July 30, 1996 (the "Merged Redevelopment Plan") also states that "[n]ot less than forty percent (40%) of the dwelling units required to be available at affordable housing costs to persons and families of low or moderate income shall be available at affordable housing costs to very low income households." (See Merged Redevelopment Plan, at page 17.) Community Redevelopment Law requires that the 15% be within the project area, but does not mandate that the 15% be located at the same site as the new or substantially rehabilitated dwelling units. Thus, the affordable units could be located anywhere within the Merged Redevelopment Project Area. Because the Proposed Project may include up to 2,995 market-rate units, the 15% rule could require the redevelopment agency to create up to 529 units to be occupied by persons and families of low or moderate income, within the Merged Project Area. (If 3,524 units are developed, 85% market rate units would be 2,995, and 15% affordable units would be 529). The 20% set-aside could generate funding sufficient to meet the goal of 529 units within the Merged Redevelopment Project Area.

community are met through a diverse housing stock. The Proposed Project provides a wide range of product types, many of which are not otherwise available in the City of Inglewood. The various housing product types available provide opportunities for ownership housing for various income levels including first time home-buyers, move-up buyers and empty-nesters. The homeowners will have a vested interest in the maintenance and upkeep of the new community, since they will have a financial stake in fostering the ongoing beautification and security of the community. The residential dwelling units constructed on the Project Site will also promote the goal of the Housing Element to reduce the adverse impact of aircraft noise, since all residential units will be designed such that the residences will have a maximum interior noise level of 45 dBA CNEL.

Although the Hollywood Park project does not maintain, rehabilitate or modernize the existing housing stock, it provides for the construction of up to 2,995 new residential units, thereby increasing the City's overall housing stock with new residential units. In addition, the Proposed Project will contribute to the ability of the Redevelopment Agency to provide affordable housing by providing tax increment financing. The tax increment funds could be used by the Redevelopment Agency to rehabilitate and modernize units within the existing housing stock to create affordable housing units. As a result, the Proposed Project is consistent with the goals and policies established in the City's 2000 Housing Element.

SCAG's Compass Growth Vision Strategy

The Proposed Project would be generally consistent with SCAG's Compass Growth Vision principles. While the Project Site is not located within a Compass 2% Strategy Opportunity Area, it is located in an area that is generally supportive of the underlying goals of the growth visioning effort. A detailed consistency analysis of the supporting policy and planning strategies for each of the four growth visioning principles is provided below in Table IV.H-7. As detailed in Table IV.H-7, the Proposed Project would be consistent with SCAG's Growth Vision Strategy and therefore regional planning consistency impacts would be considered less than significant.

Table IV.H-7
SCAG's Compass Growth Vision Consistency Analysis

Compass Growth Vision Principles	Project Consistency Analysis
<p>1. Improve mobility for all residents.</p> <ul style="list-style-type: none"> Encourage transportation investments and land use decisions that are mutually supportive. Locate new housing near existing jobs and new jobs near new housing. 	<p>Consistent: The Proposed Project includes several Project Design Features to make roadway improvements at various intersections throughout the City to improve mobility. Furthermore, the Project Site is located along two major circulation corridors and is adequately served by existing modes of public transit. The MTA operates ten transit routes along the major roadways surrounding the Project Site. In addition, the project area is currently served by two Metro Green Line Stations: the Hawthorne Station located approximately one mile to the southwest and the Crenshaw Station located approximately one and a half mile to the southeast.</p> <p>Consistent: The Proposed Project is a mixed-use development that would place new residential, retail, hotel, civic, open space and commercial office</p>

Compass Growth Vision Principles	Project Consistency Analysis
	development in an urban area that is jobs-rich. The new housing would be complimentary to existing employment opportunities in the City and surrounding area and the new retail, hotel, civic, and commercial office uses would provide new employment opportunities for existing resident populations as well as for the new residents generated by the residential uses of the Proposed Project.
<ul style="list-style-type: none"> • Encourage Transit Oriented Development. 	<p>Consistent: While the Proposed Project would not be considered a Transit Oriented Development by definition “ it would encourage the use of public transit as the Project Site is adequately served by existing bus lines that provide direct connectivity to two regional Metro Green Line Stations that are located within one and one and one-half miles of the Project Site.</p>
<ul style="list-style-type: none"> • Promote a variety of transit choices. 	<p>Consistent: As stated above, the Project Site is adequately served by 10 existing bus lines that provide direct connectivity to two regional Metro Green Line Stations that are located within one and one and one-half miles of the Project Site. In addition, the Proposed Project is a mixed-use development that promotes walkability by providing pedestrian paseos and walkways that provide for safe pedestrian routes throughout the proposed development.</p>
2. Foster livability in all communities.	
<ul style="list-style-type: none"> • Promote infill development and redevelopment to revitalize existing communities. 	<p>Consistent: The Proposed Project would redevelop an existing racetrack facility and provide a mixed-use community with 2,995 dwelling units and up to 620,000 square feet of retail uses. The proposed development is located in a designated redevelopment project area and thus would contribute to the revitalization of the community.</p>
<ul style="list-style-type: none"> • Promote development plans that provide a mix of uses. 	<p>Consistent: The Proposed Project would include up to 2,995 dwelling units with a range of housing product types, 75,000 sf of office space, a maximum 120,000 sf Casino, a 300 room hotel with 20,000 sf of ancillary meeting space, a 4-acre civic site, 25 acres of parks and open space and 620,000 sf of retail area. As such, the project would promote a mix of land uses.</p>
<ul style="list-style-type: none"> • Promote “people-scaled,” pedestrian friendly communities. 	<p>Consistent: The mix of land uses that are proposed would support a “people scaled” environment. The development also promotes walkability by providing pedestrian paseos and walkways that provide for safe pedestrian routes throughout the proposed development.</p>
<ul style="list-style-type: none"> • Support the preservation of stable, single family neighborhoods. 	<p>Consistent: The Proposed Project would redevelop an existing recreational facility and would not displace any housing units. In addition, the Project Site borders two neighboring single-family development projects (to the north and east) and is proximate to several multi-family housing uses along Prairie Avenue and Century Boulevard. The Proposed Project is complementary to the surrounding residential uses and would reduce noise and light and glare impacts that are currently generated by the racetrack events. The land use plan developed in the Hollywood Park Specific Plan has also given special</p>

Compass Growth Vision Principles	Project Consistency Analysis
	consideration to placing land uses on the Project Site in a manner that would be compatible with the existing residential neighborhoods surrounding the Project Site.
3. Enable prosperity for all people.	
<ul style="list-style-type: none"> • Provide a variety of housing types in each community to meet the housing needs of all income levels. 	Consistent: The Proposed Project would provide a range of for sale and rental products within a variety of product types (i.e., single-family attached and detached units, stand alone multi-family developments and mixed-use multi-family developments).
<ul style="list-style-type: none"> • Support educational opportunities that promote balanced growth. 	Consistent: The Project Applicant has met with various local community groups and civic leaders throughout the planning process to present the planning and development concepts and to solicit feedback from the community. Through this process the Proposed Project has evolved into its current state, representing a balanced mixed-use development that incorporates a comprehensive vision for future growth of the City.
<ul style="list-style-type: none"> • Ensure environmental justice regardless of race, ethnicity or income classes. 	Consistent: The Proposed Project would redevelop an existing recreational facility and would not displace any housing units. Additionally, the Proposed Project would not significantly impact a disproportionate population of the City's ethnic or low-income populations. The Project would provide 25 acres of parks and open space, and provide extraordinary retail and public amenities to an underserved area.
<ul style="list-style-type: none"> • Support local and state fiscal policies that encourage balanced growth. 	Consistent: The Proposed Project would encourage balanced growth as it incorporates 2,995 dwelling units and 620,000 square feet of retail land uses and 75,000 square feet of commercial office. The Proposed Project will also retain the existing casino. The on-site jobs to housing balance would be approximately 1.06 based on a total employment generation of 3,135 jobs and 2,995 dwelling units.
<ul style="list-style-type: none"> • Encourage civic engagement. 	Consistent: The Project Applicant has met with various local community groups and civic leaders throughout the planning process to present the planning and development concepts and to solicit feedback from the community. Through this process the Proposed Project has evolved into its current state, representing a balanced mixed-use development that incorporates a comprehensive vision for future growth of the City. The Project also includes a 4-acre civic site, which is proposed to be made available to a public entity for civic uses that could further encourage ongoing civic engagement in the City.
4. Promote sustainability for future generations.	
<ul style="list-style-type: none"> • Preserve rural, agricultural, recreational and environmentally sensitive areas. 	Consistent: The Proposed Project is an infill redevelopment project that would redevelop an existing racetrack and thus would not displace or eliminate any rural, agricultural or environmentally sensitive areas. The Proposed Project would include 25 acres of parks, open space, and recreational facilities.
<ul style="list-style-type: none"> • Focus development in urban centers and existing facilities. 	Consistent: The Proposed Project would redevelop an existing land use that is currently adequately supported by utility and service infrastructure. Increased demands

Compass Growth Vision Principles	Project Consistency Analysis
	for public utilities and services would be offset by the Proposed Project's design features and mitigation measures that would reduce impacts to less than significant levels (see Sections IV.J, Public Utilities and IV.K, Public Services).
<ul style="list-style-type: none"> • Develop strategies to accommodate growth that use resources efficiently, eliminate pollution, and significantly reduce solid waste. 	<p>Consistent: 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. In addition, the Proposed Project will be required to follow all applicable City of Inglewood policies related to curbside collection and recycling programs. Also, as a mixed-use community, the Proposed Project helps to reduce the overall vehicle miles traveled since it provides a mix of uses within close proximity to each other.</p>
<ul style="list-style-type: none"> • Utilize "green" development techniques. 	<p>Consistent: The Proposed Project includes sustainable goals that will promote energy efficiency and water conservation standards into the proposed development. As part of the Proposed Project's Plot Plan Review process, each builder would incorporate energy efficiency and other conservation measures from the Hollywood Park Specific Plan Sustainability Strategy Checklist.</p>
<p><i>Notes:</i> ^a Transit Oriented Developments (TODs) generally are located within a radius of one-quarter to one-half mile from a regional transit station. Source(s): Growth Principles: SCAG Compass Growth Vision Report, 2004; Consistency Analysis: Christopher A. Joseph & Associates, 2008.</p>	

Land Use Equivalency Program Impacts

The Project's proposed Equivalency Program is limited to an exchange of specific land uses. Implementation of the Equivalency Program is not anticipated to have an effect on the analysis of the Project's relationship with adopted City housing policies or SCAG policies and programs, except as noted below, because the Equivalency Program does not fundamentally alter the Project's land use mix and thus, would not have a noticeable change in the policy analyses presented above. The Equivalency Program, as is the case with the Proposed Project, would have a less than significant impact relative to displacement of people and housing, impacts upon regional population and housing related to temporary construction jobs, and indirect impacts to population and housing demographics generated by the new residential, commercial office, retail and hotel uses of the Proposed Project. The Equivalency Program, like the Proposed Project, is consistent with the City of Inglewood's local community housing goals and policies, the Redevelopment Agency's goals and policies, the RCPG and the RHNA. However, implementation of the proposed Equivalency Program would alter the Project's relationship with adopted local growth forecasts and its employment generation. Additional analysis of these issues is addressed below.

Local Growth Forecasts

Housing

Project increases to housing under the Maximum Retail, Maximum Office/Commercial and Maximum Hotel Equivalency Scenarios would be equal to those of the Proposed Project, as the same number of residential dwelling units (i.e. 2,995) are proposed under each Equivalency Scenario land use mix. However, the Maximum Housing 1, Maximum Housing 2 and Maximum Housing 3 Equivalency Scenarios would have greater impacts on growth forecasts as the number of housing units within these three scenarios propose an additional 505 dwelling units. Similar to the Proposed Project, all of the Equivalency Scenarios would be inconsistent with the 2008 RTP; the Maximum Retail, Maximum Office/Commercial and Maximum Hotel Equivalency Scenarios would each exceed the City's 2015 growth projection by 3,815 dwelling units, and the Maximum Housing 1, Maximum Housing 2 and Maximum Housing 3 Equivalency Scenarios would exceed the City's 2015 growth projection by 4,320 dwelling units. Although on a regional basis, the region can support more housing given the level of jobs in the region as described above for the Proposed Project, the proposed Equivalency Program's technical inconsistency with the housing growth projects for the City would result in a significant impact, like the Proposed Project.

Population

Project impacts from the on-site resident population under the Maximum Retail, Maximum Office/Commercial and Maximum Hotel Equivalency Scenarios would be equal to those of the Proposed Project, as these scenarios propose the same amount of residential development as the Proposed Project. However, the Maximum Housing 1, Maximum Housing 2 and Maximum Housing 3 Equivalency Scenarios would have greater impacts than the Proposed Project on adopted growth forecasts as the on-site resident population under these three scenarios increases by 1,515 people to 10,500, as shown on Table IV.H-8. While the Project's on-site population would increase under these three scenarios, as is the case with the Proposed Project, all of the Equivalency Scenarios would be inconsistent with the regional growth projections for the City as the population growth generated by the Maximum Retail, Maximum Office/Commercial and Maximum Hotel Equivalency Scenarios would each exceed the total anticipated growth for 2015 by 7,678 persons, and the Maximum Housing 1, Maximum Housing 2 and Maximum Housing 3 Equivalency Scenarios would each exceed the total anticipated growth for 2015 by 9,193 persons. As is the case with the Proposed Project, the inconsistency of the Equivalency Program can be attributed to the fact that the City of Inglewood is built out and has few remaining undeveloped parcels available to accommodate future growth, in addition to the other factors discussed above for the Proposed Project. Nevertheless, the population growth anticipated by the proposed Equivalency Program would not result in a significant environmental impact, as the surrounding infrastructure would be able to accommodate the proposed development with the Project Design Features and Mitigation Measures to be implemented. (See Section VI. Alternatives to the Proposed Project, E. Alternative RU 3,500, which studies the impacts of developing 3,500 dwelling units on the Project Site). However, due to the proposed Equivalency Program's technical inconsistency with the population growth projections for the City, like the Proposed Project, impacts to population growth would be considered a significant impact.

Employment

Direct Employment Growth

Under the Maximum Office/Commercial Equivalency Scenario, the employment generated would be more than under the Proposed Project. The on-site employment generated by all other Equivalency Scenarios would be less than the Proposed Project. However, all of the Equivalency Scenarios produce a net positive level of jobs. While the Proposed Project produces 517 net new jobs, Maximum Housing 1 Equivalency Scenario produces 371 net new jobs, Maximum Housing 2 Equivalency Scenario produces 362 net new jobs, Maximum Housing 3 Equivalency Scenario produces 403 net new jobs, Maximum Retail Equivalency Scenario produces 447 net new jobs, Maximum Office/Commercial Equivalency Scenario produces 711 net new jobs, and Maximum Hotel Equivalency Scenario produces 505 net new jobs, as shown on Table IV.H-8. Therefore, like the Proposed Project's anticipated employment generation of net new jobs, the Equivalency Program's generation of net new jobs would be consistent with local employment forecasts and would thus be considered less than significant.

CUMULATIVE IMPACTS

Development of the Proposed Project, in conjunction with the Related Projects listed in Section III would result in further development of various urban land uses in the City of Inglewood. The related projects identified within the City of Inglewood are estimated to generate approximately 1,165 dwelling units generating an estimated permanent population increase of 3,495 persons by 2020.²² It should be noted that while there were a total of 1,353 dwelling units identified in the related project list for the City of Inglewood, 188 dwelling units from the Renaissance Development Project (Related Project #I-2) were under construction at the time the traffic counts were collected in September and October of 2006 but were constructed and occupied prior to January 1, 2008. As such these units are accounted for in the 2008 existing housing data reported by the Department of Finance and have been netted out of the calculation for cumulative dwelling units. Although the Proposed Project's build-out year is approximately 2014, the planning horizon for the cumulative population and housing projections were based on 2020 because many of the related projects have not yet been approved or even applied for and would most likely not be built out by 2015, thus making the longer 2020 time horizon more appropriate.

As shown in Table IV.H-9, the Proposed Project plus cumulative project related growth would yield a total of 4,160 housing and approximately 12,480 residents. Under the proposed Equivalency Program, future growth resulting from the Proposed Project plus cumulative project related project development could increase to a maximum of 4,665 new dwelling units and approximately 13,995 residents. Such growth under either scenario would be inconsistent with the 2020 regional housing growth forecast as it would exceed growth estimates by 4,420 to 4,925 units and would be inconsistent with the 2020 regional population growth forecast by 10,680 to 12,195 people. Notwithstanding this inconsistency, the Proposed Project, including the Equivalency Program, plus the related projects would be substantially consistent

²² The population projections were uniformly based on an estimated population to housing ratio of 3.0 residents per dwelling unit.

Table IV.H-8
Population, Housing and Employment Impacts Under the Proposed Land Use Equivalency Scenarios

Land Use	Ave. Household Size	Equivalency Scenario: Maximum Housing 1		Equivalency Scenario: Maximum Housing 2		Equivalency Scenario: Maximum Housing 3		Equivalency Scenario: Maximum Retail		Equivalency Scenario: Maximum Office/Commercial		Equivalency Scenario: Maximum Hotel	
		Quantity of Land Uses	Total Population	Quantity of Land Uses	Total Population	Quantity of Land Uses	Total Population	Quantity of Land Uses	Total Population	Quantity of Land Uses	Total Population	Quantity of Land Uses	Total Population
Residential (du)	3.0	3,500	10,500	3,500	10,500	3,500	10,500	2,995	8,985	2,995	8,985	2,995	8,985
Proposed Project			8,985		8,985		8,985		8,985		8,985		8,985
Over/(Under) Proposed Project			1,515		1,515		1,515		-		-		-
<u>Employment*</u>	Employment Generation Rate**	Quantity of Land Uses	Total Employment	Quantity of Land Uses	Total Employment	Quantity of Land Uses	Total Employment	Quantity of Land Uses	Total Employment	Quantity of Land Uses	Total Employment	Quantity of Land Uses	Total Employment
Residential (du)	0.13	3,500	455	3,500	455	3,500	455	2,995	389	2,995	389	2,995	389
Retail (sf)	1.87	575,000	1,075	590,200	1,104	575,000	1,075	671,000	1,255	575,000	1,075	575,000	1,075
Office/Commercial (sf)	3.51	50,000	176	50,000	176	70,000	246	50,000	176	176,400	619	50,000	176
Hotel													
Rooms (sf)***	1.13	173,600	196	140,000	158	140,000	158	140,000	158	140,000	158	350,000	396
Meeting Space (sf)	3.51	20,000	70	20,000	70	20,000	70	20,000	70	20,000	70	20,000	70
Total			1,972		1,963		2,004		2,048		2,312		2,106
Proposed Project			2,120		2,120		2,120		2,120		2,120		2,120
Over/(Under) Proposed Project			(147)		(157)		(115)		(71)		193		(14)
Existing (Hollywood Park Racetrack, excluding Casino)			1,601		1,601		1,601		1,601		1,601		1,601
Net Total			371		362		403		447		711		505
<u>Notes:</u> *Does not include employment generated by the existing casino since the casino use is not subject to the Equivalency Program **For residential, generation rate is per dwelling unit; for all other land uses, generation rate is per 1,000 s.f. ***Assumes each hotel room is 700 s.f. **** Net Total = Equivalency Scenario less Existing.													

with the local and regional housing goals and policies, the Redevelopment Agency goals and policies, the RCPG, and the RHNA to accommodate housing through infill development and in areas that are adequately served and equipped to accommodate such growth. Furthermore, it should be noted that even though the RTP was adopted as recently as 2008, the 2020 growth forecast for the City of Inglewood is already inconsistent with the most current housing and population data reported by the Department of Finance. As compared to existing population and housing units reported by the Department of Finance in January 2008, SCAG's RTP (adopted in May 2008) projects that there would be a 260 fewer dwelling units in 2020 than currently exist. In terms of population growth, SCAG's RTP projects a 2020 population of 120,678 persons, which is only 1,800 more persons than the resident population reported by the Department of Finance in January 2008. Given this anomaly, the Proposed Project, including the Equivalency Program, plus the related projects would exceed SCAG's regional adopted housing and population growth projections for the City. While it is anticipated that this planning inconsistency impact would likely be reconciled by SCAG during future regional growth updates, no feasible mitigation measures exist that would bring the project into compliance with the projected growth forecasts. As such, cumulative impacts associated with population and housing would be significant and unavoidable.

**Table IV.H-9
Cumulative Population and Housing Impacts**

	Existing (2008)^a	2020 Growth Forecast	Project+ Related Project Growth^b	2020 w/Project and Related Projects	Over/(Under) Citywide Growth Forecast
Housing					
SCAG Forecasts for the Inglewood Subregion	38,968	38,708	4,160-4,665	43,128-43,633	4,420-4,925
Population					
SCAG Forecasts for the Inglewood Subregion	118,878	120,678	12,480-13,995 ^c	131,358-132,873	10,680-12,195

^a 2008 estimates based on the California Department of Finance, Table E-5: Table 2: E-5 City/County Population and Housing Estimates, 1/1/2008.

^b Includes the anticipated construction of 2,995 Project-related housing units and 1,165 housing units identified as related projects in the City of Inglewood (see Section III, Related Projects). (A total of 1,353 dwelling units are identified in the related projects list. This figure reflects the 1,353 dwelling units less the 188 dwelling units that were constructed as part of the Renaissance Project. Those units were constructed after the traffic counts were collected in 2007 but prior to January 2008 when the housing data was reported to the Department of Housing. As such, they are accounted for in the "2008 Existing" column in this table.

^c Based on an estimated population/housing ratio of 3.0 persons per dwelling unit.

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

PROJECT DESIGN FEATURES

No specific PDFs have been proposed with respect to population, housing and employment.

MITIGATION MEASURES

Although plan consistency impacts with regional growth projections have been identified, no mitigation measures are proposed. This is because the impact is viewed as being technical in nature. In fact, adding housing to a jobs-rich area is considered a positive benefit, and consistent with the spirit and intent of the growth policies. As noted, the current population and existing number of residential units currently in the City are also inconsistent with existing growth projections.

LEVEL OF IMPACT AFTER MITIGATION

With respect to threshold question (a) of the Appendix G to the State CEQA Guidelines, the Proposed Project, including the Equivalency Program, would induce substantial population growth in an area that is inconsistent with regional growth projections for the City of Inglewood. Although on a regional basis, the region can support more housing given the level of jobs in the region, and the adequacy of public infrastructure and services, the Proposed Project's technical inconsistency with the housing and population growth projects for the City would result in a significant and unavoidable plan consistency impact.

With respect to threshold question (b) the Proposed Project, including the Equivalency Program, would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. As such, no housing displacement impacts would be created and no mitigation measures are required.

With respect to threshold question (c) the Proposed Project, including the Equivalency Program, would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. As such, no housing displacement impacts would be created and no mitigation measures are required.