

3.9 Land Use and Planning

This section describes and evaluates potential impacts related to land use and planning that could result from implementation of the Proposed Project. The section describes existing and planned land uses in and adjacent to the project site, including current land uses, land use designations, and zoning. The section contains: (1) a description of the environmental setting to establish baseline conditions for land use and planning; (2) a summary of the regulations related to land use and planning; and (3) an analysis of potential impacts to land use and planning associated with the implementation of the Proposed Project. Section 15125 of the State CEQA Guidelines states that the EIR shall discuss “any inconsistencies between the proposed project and applicable general plans, specific plans and regional plans,” and accordingly, the regulatory framework discussion includes consideration of potential inconsistencies between the Proposed Project and relevant local and regional plans and policies.

The question of the environmental compatibility of the Proposed Project with adjacent and nearby land uses is not addressed in this section. Rather, the reader is referred to the various environmental resource evaluations presented in Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, for a discussion of potential physical/environmental effects and potential incompatibilities that may be considered in the determination of physical environmental impacts. For example, land uses that produce excessive noise, light, dust, odors, traffic, or hazardous emissions may be undesirable when they intrude on places used for residential activities (residences, parks, etc.). Thus, certain industrial or commercial uses (which can produce noise and odors) may not be considered compatible with residential, educational, or healthcare uses, unless buffers, landscaping, or screening could protect residents from health hazards or nuisances. Such potential land use incompatibilities would be addressed in the applicable environmental resource sections in Chapter 3, Environmental Impacts, Settings, and Mitigation Measures.

Six comment letters that addressed issues related to land use and land use planning were received on the NOP. Those specific comments are summarized below:

1. A letter was received from the Los Angeles County Fire Department (LACFD), dated March 20, 2018. This comment letter provides standard conditions and project specific requirements and recommendations for land development such as “the development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.”
2. A letter was received from the Los Angeles County Metropolitan Transportation Authority (Metro) on March 20, 2018 that provides information on transit oriented communities (TOCs) and how the project area is associated with various Metro Transit Oriented Services.
3. A letter received was from Douglas P. Carstens of Chatten-Brown & Carstens LLP, dated March 21, 2018. The commenter proposes that a potential rezone of the Lockhaven Tract back to its original residential zoning should be analyzed as a project alternative. The commenter continues with this idea by stating that it is apparent that one or more zone

changes would be required as part of the Project approval; therefore, the alternative of changing zoning to R-1 or other residential zoning should be analyzed in the EIR.

4. A letter received from Amy R. Forbes of Gibson Dunn, who represents the Hollywood Park Land Company (dated March 22, 2018), states that there are portions of the stadium property that have a General Plan designation that would permit a 2.0 floor area ratio (FAR) of commercial development, although a specific plan amendment is required to set the precise uses. It states that pursuant to Section 7.1 of the Stadium Development Agreement with the City of Inglewood, the 2.0 FAR called for in the General Plan is vested, and that in accordance with Section 8 of their Development Agreement, in approving any subsequent approval, including the amendment to a specific plan, the City may not limit, reduce, or modify the density or intensity of the Proposed Project.
5. A letter from Uplift Inglewood, dated March 22, 2018, states that the EIR must discuss inconsistencies between the Proposed Project and applicable general plans, specific plans, and regional plans. The comment letter also states that the Proposed Project would require a general plan amendment, zoning changes, site plan review, a master sign plan, merger and re-subdivision map, development agreements, and relocation of well. The comment letter also states that the EIR should include an analysis of the Project's consistency with the Housing Element policies and programs specific to affordable housing and community stability.
6. A letter was received from SCAG dated April 23, 2018. SCAG requests that environmental documentation be sent to them and requests that the Proposed Project be consistent with the 2016 RTP/SCS goals and strategies. The comment letter also provides growth forecasts for the City of Inglewood.

All issues and concerns described within the comment letters above regarding consistency with applicable plans, development regulations, and zoning codes are discussed and analyzed within this section.

3.9.1 Environmental Setting

Regional Setting

The City of Inglewood has historically been developed as a low density single-family community. The City's land uses are comprised of residential (46.7 percent), right-of-way (23.5 percent), public/semi-public (20.3 percent), commercial (6.1 percent) and industrial (3.7 percent) uses.¹ Existing zoning allows 60 percent of residentially zoned land to be developed into two-family or multi-family (three or more) units. As such, there are currently more multiple dwelling units than single family units in the City.

A majority of the City's commercial uses are located along major arterials. The two major components of commercial land uses include retail-service and automobile sales and service, representing 63 percent and 20 percent, respectively, of all commercial uses. The City is experiencing a growth of light industrial oriented uses focused on shipping in and out of Los

¹ City of Inglewood General Plan, Land Use Element, Land Use Comparison table, Inglewood Land Use, page 54, Available: <https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-PDF>.

Angeles International Airport (LAX). Light industrial is the predominate industrial zoning representing 75 percent of industrial land with heavy industrial representing the remaining 25 percent. Land uses included within the City's public/semi-public areas include parks, schools, government buildings and facilities, churches, the cemetery, and hospitals.

The City's right-of-way area includes 180 miles, or 1,337 acres, of streets and alleys. The City is primarily developed with approximately one percent of its total land area still vacant. A majority of the vacant land is designated for industrial land uses with minimal vacant land designated for residential and commercial uses.² **[Note to Team: City to provide additional information regarding the history of vacant property within the city, if known.]**

The project site is located in the southwestern portion of the City in an area comprised of a mix of low to medium-density one- and two-story residential, one-story commercial, one-story office entertainment, industrial, trucking and parking uses and vacant parcels. West Century Boulevard, a major commercial corridor, borders the project site on the north. The West Century Boulevard corridor, from South Prairie Avenue to Crenshaw Boulevard, is characterized by one -and-two story commercial development that includes fast food restaurants, motels, retail, and commercial shopping centers.

North of the project site (approximately 0.8 miles north) along South Prairie Avenue is The Forum, a multi-purpose 17,500-seat indoor arena that served as home of the Los Angeles Lakers basketball team and Los Angeles Kings hockey team until 1999. The Forum was substantially renovated in 2014 and is now a venue exclusively used for music and entertainment.

South Prairie Avenue is another major commercial corridor that runs north-south through the City of Inglewood and borders the project site on the west. Land uses along South Prairie Avenue near the project site include commercial development, including restaurants, automotive uses, small commercial shopping centers, and offices, interspersed with residential uses.

The project site is located approximately 1.5 miles east of the Los Angeles International Airport (LAX) and approximately 1.5 miles to the north of the Hawthorne Municipal Airport. The project site is partially within the Planning Boundary/Airport Influence Area for LAX as designated within the ALUP. As depicted in Figure 2-6, of Chapter 2, Project Description, the project site falls within the Airport Influence Area and Airport Compatibility Zone for LAX for the southern LAX runway. As shown, the majority of the project site is within the 65 dBA CNEL noise contour with a small amount of the southernmost portion of the project site within the 70 dBA CNEL noise contour. For further discussion of the aircraft noise environment on and around the project site, please see section 3.10, Noise and Vibration. The project site is not located within the designated Airport Influence Area for the Hawthorne Municipal Airport.

² City of Inglewood General Plan, Land Use Element, updated 2016, Available: <https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016-PDF>.

Hollywood Park Specific Plan

From 1938 until 2013, except for a few years during World War II, the Hollywood Park horse racetrack operated on approximately 240 acres of land north of West Century Boulevard, and east of South Prairie Avenue. For a number of years prior to the closure of the track, it was apparent that the current and future economics of horse racing, combined with the increasing value of the property, would result in closure and redevelopment of the Hollywood Park property. In anticipation of the expected closure of the racetrack, on July 8, 2009 the City approved and adopted the Hollywood Park Specific Plan (HPSP). The HPSP was amended September 23, 2014, and then further amended through approval of an ordinance that adopted the City of Champions Revitalization Initiative on February 24, 2015.³

The project site is located immediately to the south of the HPSP area, within which the City of Champions Stadium, to be the home of the National Football League Los Angeles Rams and Los Angeles Chargers teams, is under construction. The HPSP also calls for development of substantial amounts of retail, office, residential, and parking development.

Project Site Existing Land Uses

[Note to Team: To include a full description of the history of the site properties here.]

The entire project site is comprised of approximately 28 acres and consists of four subareas: the arena site; the parking garage site and bus staging/transportation network company (TNC) drop off area (parking garage site); the hotel and surface parking site; and the well relocation site. A majority of the project site, all but five parcels, is currently vacant or undeveloped. The vacant parcels within the project site total approximately 23 acres, or more than 85 percent of the project site. The five developed parcels, all within the arena site, include a restaurant (privately-owned), a hotel (privately-owned), warehouse and light manufacturing facilities (privately-owned), and a groundwater well and related facilities (City-owned). All but 9 of the 40 parcels within the arena site are City-owned or owned by the City as the Successor Agency of the former Inglewood Redevelopment Agency; the rest of the parcels within the arena site are privately-owned. The well relocation site is owned by the City. All parcels within the parking garage site are owned by the City. The hotel and surface parking site is entirely owned by the City as the Successor Agency of the former Inglewood Redevelopment Agency.

Arena Site

As can be seen on **Figure 3.9-1**, the approximately 16.71-acre arena site is primarily vacant with limited existing commercial and hotel uses and associated surface parking. Within the arena site, at the southeast corner of West Century Boulevard and South Prairie Avenue, is an occupied fast food restaurant (Church's Chicken Restaurant located at 3950 West Century Boulevard) and an associated surface parking lot. Immediately to the east is an occupied two-story, 38-room motel

³ Hollywood Park Specific Plan, Unofficial Reference Guide Only for Stadium Alternative Project, adopted July 8, 2009, amended September 23, 2014, further amended February 24, 2015. Available: <https://www.cityofinglewood.org/DocumentCenter/View/1347/Hollywood-Park-Specific-Plan>. Accessed September 2018.

(Rodeway Inn & Suites located 3940 West Century Boulevard) and associated surface parking lots provided in the front and rear of the motel. Directly east of the Rodeway Inn & Suites motel fronting West Century Boulevard, is a vacant parcel surrounded by chain link fencing. The northeastern portion of the arena site is a narrow vacant parcel surrounded by chain link fencing and green screening. Located on this vacant parcel is an access road into the arena site that had previously been used to support the storage and staging of construction materials associated with a since completed street improvement project.

Fronting West 102nd Street to the north, is a vacant parcel associated with the arena site that is surrounded by chain link fencing and screening. A 980-foot linear section of West 102nd Street between South Prairie Avenue and South Doty Avenue would be vacated and developed with the arena building. Further west, is the City of Inglewood Water Well #6 that is surrounded and secured by vertical blue metal fencing and an access gate. Also within the arena site to the west and north of Water Well #6, are occupied two-story commercial warehouse facilities (Sugarfina located at 3915 West 102nd Street) and surface parking. To the west is a vacant parcel surrounded by chain link fencing that extends to South Prairie Avenue and West Century Boulevard. On the arena site, at the northeast corner of South Prairie Avenue and West 102nd Street, is a Clear Channel billboard.

Fronting West 102nd Street to the south is a vacant parcel surrounded by chain link fencing. Also located on the arena site, is a vacant one- and two-story concrete commercial building (3838 West 102nd Street) that includes an access driveway. To the south is an occupied commercial use (Let's Have a Cart Party located at 10212 South Prairie Avenue).

Parking Garage Site and Bus Staging/TNC Drop Off Area

The parking garage site and bus staging/TNC drop off area is approximately 5 acres on the north and south sides of West 101st Street, bounded by West Century Boulevard to the north, South Prairie Avenue on the east, West 102nd Street to the south, and residential uses to the west. As shown in Figure 3.9-1, the site is currently vacant and is surrounded by chain link fencing.

Hotel and Surface Parking Site

As shown in Figure 3.9-2, the approximately 5.16-acre hotel and surface parking site consists of a vacant parcel surrounding by vertical metal fencing and intermittent green screening.

Well Relocation Site

The 0.70-acre well relocation site is currently vacant and is surrounded by chain link fencing (see Figure 3.9-1).

Figure 3.9-1 Existing and Surrounding Land Uses: Arena Site, Well Relocation Site and Parking Garage Site and Bus Staging / TNC Drop Off Area

Figure 3.9-2 Existing and Surrounding Land Uses: Hotel and Surface Parking Site

Surrounding Land Uses

Arena Site

As shown in Figure 3.9-1, located outside of the arena site, to the east of the vacant parcel along West Century Boulevard, is a non-operational three-story structure that was formerly operated as the Airport Park View Hotel (located at 3900 West Century Boulevard) and associated surface parking. The structure is currently dilapidated, and would require substantial renovation before it could be reused for a hotel or other use. Located directly east of the hotel are occupied one- and two-story commercial buildings (Extra Space Storage located at 3846 West Century Boulevard) and associated surface parking. To the north of the arena site, West Century Boulevard provides an east-west roadway connection through the City of Inglewood. North of the roadway, the HPSP area is planned for the location of the City of Champions Stadium and a mix of commercial, office, retail, residential, mixed use, civic, and recreational development.

Adjacent land uses bordering the arena site to the east include an occupied warehousing and shipping company (S.E.S. International Express located at 10105 South Doty Avenue, Unit A) and associated surface parking. The S.E.S. International Express buildings and associated surface parking extends the entire block between West Century Boulevard and West 102nd Street. To the immediate east of S.E.S. International Express buildings is South Doty Avenue. East of South Doty Avenue is a currently occupied two-story warehouse building (ZHL Logistics located at 3750-3780 West Century Boulevard) and associated truck loading area. The ZHL Logistics building and associated truck loading area extends the entire block between West Century Boulevard and West 102nd Street. To the east of the ZHL Logistics is a single-story vacant warehouse building (located at 3738 West Century Boulevard). East of the vacant warehouse building is an occupied single-story aquarium/pet store (Transworld Aquatic Enterprises, Inc. located at 3730 West Century Boulevard). Adjacent land uses further to the southeast of the arena site include an occupied commercial uses (CDs Cabinets located at 3820 West 102nd Street), a vacant lot (the proposed well relocation site), and single-family residences located on the south side of West 102nd Street near South Doty Avenue. Fronting West 104th Street and located immediately south of the arena site are single-family residences, multi-family residences, and a church (Southside Christian Church located at 3947 West 104th Street) with associated surface parking.

Adjacent land uses to the west of the arena site along South Prairie Avenue between West 104th Street and West 103rd Street include residential uses and an occupied single-story automotive body shop (Auto Collision Team located at 10305 South Prairie Avenue). Uses along South Prairie Avenue between West 103rd Street and West 102nd Street include residential, an occupied single-story automotive shop (LAX Mercedes BMW Service and Repair located at 10223 South Prairie Avenue), and an occupied single-story religious facility and related buildings and associated surface parking (Being in Power Ministries located at 10201 South Prairie Avenue). Uses to the west of the arena site along South Prairie Avenue between West 102nd Street and West 101st Street include a vacant parcel surrounded by chain link fencing (portion of the proposed parking garage site and bus staging/TNC drop off area). Uses to the west of the arena

site located along South Prairie Avenue between West 101st Street and West Century Boulevard include commercial uses (Starbucks located at 4000 West Century Boulevard, Liquor Warehouse located at 10023 South Prairie Avenue, and Sunshine Coin Laundry located at 10001 South Prairie Avenue) and a vacant commercial use to the east along South Prairie Avenue.

Parking Garage Site and Bus Staging/TNC Drop Off Area

As can be seen on Figure 3.9-1, to the north of the site across West Century Boulevard includes occupied single-story commercial buildings (Chevron located at 4015 West Century Boulevard, McDonald's located at 4015 West Century Boulevard, Dr Carfix/Tiki Smog located at 4055 West Century Boulevard, Jack In the Box located at 4069 West Century Boulevard, and Auto Motor Service located at 4101 West Century Boulevard), a vacant parcel, occupied two- and three-story motels (Holly Crest Hotel located at 4027 West Century Boulevard and Motel 6 located at 4123 West Century Boulevard) and an unoccupied and unnamed motel located at 4059 West Century Boulevard.

Uses located immediately to the east of the site include occupied commercial uses (Starbucks located at 4000 West Century Boulevard, Liquor Warehouse located at 10023 South Prairie Avenue, and Sunshine Coin Laundry located at 10001 South Prairie Avenue) and a vacant commercial use to the east along South Prairie Avenue.

To the south of the site includes West 102nd Street, an occupied single-story religious facility and related buildings and associated surface parking (Being in Power Ministries located at 10201 South Prairie Avenue), and residential uses.

To the immediate west along West Century Boulevard, is a motel (Airport Motel located at 4054 West Century Boulevard), a church (Iglesia Cristiana Pentecostes del Movimiento Misionero Mundial located at 4060 West Century Boulevard), and residential uses.

Approximately 300 linear feet of West 101st Street would be vacated and developed as part of the parking structure. The vacated portion of West 101st Street would extend from the western boundary of the existing retail center (Starbucks/Warehouse Liquor Mart/Sunshine Coin Laundry) at the southwest corner of South Prairie Avenue and West Century, to the alignment of the new north-south public roadway along the western boundary of the site.

Hotel and Surface Parking Site

As shown in Figure 3.9-2, adjacent land uses include the Hollywood Park Casino (located at 3883 West Century Boulevard) and associated three-story parking structure across West Century Boulevard to the north.

Adjacent to the hotel and surface parking site to the east is a UPS facility (located at 3600 West Century Boulevard). East of the UPS facility is South Yukon Avenue, a north-south corridor. North of West 104th Street, Yukon Avenue is characterized by two large commercial shopping centers (Century Plaza and The Village at Century) with large-scale commercial development

such as Costco and smaller commercial stores interspersed with residential development. Along South Yukon Boulevard to the southeast of the hotel and surface parking site, is the Morningside High School, Monroe Middle School, and the Clyde Woodworth Transitional Kindergarten - 5th Grade Imagine Learning Magnet school campuses.

Uses south of the hotel and surface parking site, across West 102nd Street, include a vacant lot, a residential uses, and two commercial uses (Not Just Fish and Gasket Guy, co-located at 3716 West 102nd Street).

Adjacent uses to the east of the hotel and surface parking site include an occupied single-story aquarium/pet store (Transworld Aquatic Enterprises, Inc. located at 3730 West Century Boulevard). To the west of the aquarium/pet store is a single-story vacant warehouse building (located at 3738 West Century Boulevard). To the west of the vacant warehouse building is an occupied two-story warehouse building (ZHL Logistics located at 3750-3780 West Century Boulevard) and associated truck loading area. The ZHL Logistics building and associated truck loading area extends the entire block between West Century Boulevard and West 102nd Street.

Well Relocation Site

As shown in Figure 3.9-1, to the north of the well relocation site is West 102nd Street and an occupied warehousing and shipping company (S.E.S. International Express located at 10105 South Doty Avenue, Unit A) and associated surface parking. To the east of the site are residential uses and South Doty Avenue. A vacant lot and residential uses are located to the south. To the west of the site is an occupied commercial use (CDs Cabinets located at 3820 West 102nd Street).

3.9.2 Regulatory Setting

Federal

The Federal Aviation Act of 1958 created the Federal Aviation Administration (FAA). The current name was adopted in 1967 when the agency became a part of the Department of Transportation. The FAA is tasked with, among other things, regulation of civil and commercial aviation. The Federal Aviation Administration is required to review projects that entail construction or alteration of buildings more than 200 feet above the ground level at the site. The project applicant for any project within the project site exceeding 200 feet above grade would be required to submit Form FAA 7460-1, Notice of Proposed Construction or Alteration, at least 30 days prior to the filing of an application for a construction permit.⁴ Since the Proposed Project has a proposed height of up to 150 feet, the FAA is not required to review the Proposed Project. There are no other federal regulations that specifically regulate land use or land use compatibility on non-federal lands that are applicable to the Proposed Project. Additional discussion of aircraft safety is discussed in section 3.7, Hazards and Hazardous Materials.

⁴ Federal Aviation Administration, 2017. Form FAA 7460-1, Notice of Proposed Construction or Alteration, Section 77.9 Construction or alteration requiring notice, https://www.faa.gov/documentLibrary/media/Form/FAA_Form_7460-1_AJV-1-050117.pdf, accessed September 2018.

State

Sustainable Communities and Climate Protection Act of 2008 (SB 375)

SB 375 (Chapter 728, Statutes of 2008) directs the California Air Resources Board to set regional targets for reducing greenhouse gas emissions. The law establishes a “bottom up” approach to ensure that cities and counties are involved in the development of regional plans to achieve those targets.

SB 375 relates to land use planning by building on the existing framework of regional planning to tie together the regional allocation of housing needs and regional transportation planning in an effort to reduce greenhouse gas (GHG) emissions from motor vehicle trips. Further, SB 375 established CEQA streamlining and relevant exemptions for projects that are determined to be consistent with the land use assumptions and other relevant policies of an adopted Sustainable Communities Strategy. Those exemptions and streamlining regulations are reflected in sections 15064.4, 16126.4(c), and 15183.5 of the State CEQA Guidelines. Additional discussion of the SB 375, including the Project’s consistency with SB 375, is addressed in 3.2, Air Quality.

Regional

Los Angeles County Airport Land Use Plan

The project site is located approximately 1.5 miles east of the Los Angeles International Airport (LAX) and approximately 1.5 miles to the north of the Hawthorne Municipal Airport. Pursuant to Division 9, Part 1, Chapter 4, Article 3.5, Sections 21670 – 21679.5 of the California Public Utility Code, each county in California in which there is an airport served by a scheduled airline and each county with an airport operated for the benefit of the general public, with certain exceptions, is required to establish an airport land use commission (ALUC). Each ALUC must develop a plan for promoting and ensuring compatibility between each airport in the county and surrounding land uses. In Los Angeles County, the Los Angeles County Regional Planning Commission also acts as the ALUC. ALUC’s purpose is to coordinate planning for the area around public airports to protect the public health, safety and welfare from land used that do not minimize the public’s exposure to excessive noise and safety hazards. This is achieved through review of proposed development surrounding airports and through policy and guidance provided in the Los Angeles County ALUP, which was adopted on December 19, 1991.⁵

In formulating the Los Angeles County ALUP, the ALUC establishes provisions to ensure safe airport operations, through the delineation of Runway Protections Zones (RPZs) and height restriction boundaries, and to reduce excessive noise exposure to sensitive uses through noise insulation or land reuse. The extent of the planning boundary designated for the airports in the Los Angeles County ALUP is determined by Community Noise Equivalent Level (CNEL) noise contours. Federal Aviation Regulations (FAR) Part 150, Airport Noise Compatibility Planning, sets forth the methodology and procedures to be followed when preparing aircraft noise exposure

⁵ Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, prepared by the Department of Regional Planning, adopted December 19, 1991. Available: <http://planning.lacounty.gov/view/alup/>. Accessed September 2018.

maps and developing airport /airport environs land use compatibility programs. FAR Part 150 studies typically consist of two primary components: (1) the Noise Exposure Map (NEM) report, which contains detailed information regarding existing and 5-year future airport/aircraft noise exposure patterns, and (2) the Noise Compatibility Program (NCP), which includes descriptions and an evaluation of noise abatement and noise mitigation options/programs applicable to an airport.⁶ Per the FAR Part 150 Land Use Compatibility Guidelines, residential uses are identified as non-compatible land uses for parcels exposed to 65 dBA (CNEL) or higher.⁷ Commercial land uses are identified as compatible with 65 and 70 dBA CNEL noise levels.

The project site is partially located within the Planning Boundary/Airport Influence Area for the LAX Airport as designated within the Los Angeles County ALUP. As depicted in Figure 2-6 in Chapter 2, Project Description, the project site falls within the Airport Influence Area and Airport Compatibility Zone for LAX for the southern LAX runway. As shown, the majority of the project site is within the 65 dBA CNEL noise contour with a small amount of the southernmost portion of the project site within the 70 dBA CNEL noise contour. The project site is not located within the designated Airport Influence Area for the Hawthorne Municipal Airport. Additional discussion of the Los Angeles County ALUP, including consistency with policies related to noise and safety, are addressed in section 3.7, Hazards and Hazardous Materials and section 3.10, Noise and Vibration. The following policies from the Los Angeles County ALUP are applicable to the Proposed Project:

General Policies:

Policy G-1: Require new uses to adhere to the Land Use Compatibility Chart.

Policy G-2: Encourage the recycling of incompatible land uses which are compatible with the airport, pursuant to the Land Use Compatibility Table.

Policy G-4: Prohibit uses which will negatively affect safe air navigation.

Consistent with Policy G-1 and G-2, the Proposed Project would be designed in a manner that is consistent with the Los Angeles County ALUP Land Use Compatibility Chart. The Proposed Project does not include residential or other sensitive uses that are prohibited from the applicable designation. The project site is partially located within the Planning Boundary/Airport Influence Area for the LAX Airport. The project site falls within the Airport Influence Area and Airport Compatibility Zone for LAX for the southern LAX runway. Consistent with Policy G-4, the Proposed Project would be developed in accordance with the development guidelines and standards of the Los Angeles County ALUP and would not negatively affect safe air navigation. Potential inconsistencies with Policy G-4 is further discussed in section 3.7, Hazards and Hazardous Materials. Additional discussion of the Los Angeles County ALUP, including the

⁶ City of Los Angeles, Los Angeles World Airports, Noise Management LAX, LAX Part 150 Noise Exposure Map Update, <https://lawa.org/en/lawa-environment/noise-management/lawa-noise-management-lax/lax-part-150-noise-exposure-map-update>. Accessed September 2018.

⁷ Federal Aviation Administration, Land Use Compatibility and Airports. Available: https://www.faa.gov/about/office_org/headquarters_offices/apl/noise_emissions/planning_toolkit/media/III.B.pdf. Accessed September 2018.

Project's potential inconsistencies with the ALUP policies related to noise and safety, are addressed in section 3.7, Hazards and Hazardous Materials and section 3.10, Noise and Vibration.

Local

City of Inglewood General Plan

California law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals. As stated in Section 65302 of the California Government Code, "The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principles, standards, and plan proposals." The City of Inglewood General Plan sets forth goals, objectives, and policies for the future development of the City and designates the location of desired future land uses within the City. The latest adoptions of the individual elements of the City of Inglewood General Plan are as follows: Land Use Element, adopted September 14, 2016; Housing Element 2013-2021, adopted January 28, 2014; Conservation Element, adopted October 21, 1997; Open Space Element, adopted December 1995; Safety Element, adopted July 1995; Circulation Element, adopted December 15, 1992; and Noise Element, adopted September 1, 1987. A summary of the General Plan Elements are provided below.

Land Use Element

The Land Use Element presents a long-range plan for the distribution and future use of land within the City. The Land Use Element analyzes population, existing and future land use requirements, and proposed implementation techniques. It provides a framework upon which the development of public and privately owned land can be based. The City of Inglewood General Plan Land Use Element was adopted in 1980 and amended in 1986, 2009, and 2016. The 1986 amendment was for residential development in the Limited Commercial category that lies within the In-Town Redevelopment Project Area. Included in the 2009 amendment was the inclusion of the Major Mixed-Use goal and policies. The amendment in 2016 included goals and objectives for the Downtown Transit Oriented District and the Fairview Heights Transit Oriented District. The goals and policies of the amendments in 1986, 2009, and 2016 are not applicable to the Proposed Project. The Proposed Project is only applicable to the original General Plan Land Use Element adopted in 1980 which includes goals and objectives but no policies. The following goals from the City of Inglewood General Plan Land Use Element adopted in 1980 are applicable to the Proposed Project:

A. General:

Goal: Provide for the orderly development and redevelopment of the City while preserving a measure of diversity among its parts. Allocate land in the City to satisfy the multiple needs of residents but recognize that land is a scarce resource to be conserved rather than wasted.

Goal: Help promote sound economic development and increase employment opportunities for the City's residents by responding to changing economic conditions.

Goal: Maximize the use and conservation of existing housing stock and neighborhoods and also facilitate development of new housing to meet community needs.

Goal: Develop a land use element that facilitates the efficient use of land for conservation, development and redevelopment.

Goal: Promote Inglewood's image and identify as an independent community within the Los Angeles Metropolitan area.

B. Residential:

Goal: Encourage neighborhood stability and conservation by reducing the amount of land designated for high density development.

Goal: Promote the maintenance, rehabilitation, and modernization of the City's housing stock.

Goal: Encourage the preservation of Inglewood's fair share of housing for low and moderate income persons.

Goal: Safeguard the City's residential areas from the encroachment of incompatible uses.

Goal: Foster the revitalization or, if necessary, the recycling of residential areas which cannot provide a decent living environment because of jet noise impact.

Goal: Encourage suitable condominium development as a means of diversifying types of housing and increasing the number of residents who own property.

Goal: Promote residential developments which will attract middle and upper income families who can afford the higher cost of recycled development.

C. Commercial:

Goal: Create and maintain a healthy economic condition within the present business community and assist new business to located within the City.

Goal: Protect local businessmen and encourage the importance of maintaining a strong commercial district in the downtown.

Goal: Improve the visual appearance and economic condition of the existing arterial commercial development along Inglewood's major streets.

Goal: Encourage the continued development and promotion of existing commercial centers such as Crenshaw-Imperial and Morningside Park.

Goal: Continue to promote the development of high quality commercial/office space at appropriate locations within the City through the redevelopment process.

Goal: Promote the development of commercial/recreational uses which will complement those which already are located in Inglewood.

D. Industrial:

Goal: Provide a diversified industrial base for the City. Continue to improve the existing industrial districts by upgrading the necessary infrastructure and by eliminating incompatible and/or blighted uses through the redevelopment process.

Goal: Continue the redevelopment of Inglewood by promoting the expansion of existing industrial firms and actively seek the addition of new firms that are environmentally non-polluting.

Goal: Increase the industrial employment opportunities for the City's residents.

E. Circulation:

Goal: Insure that proposed new uses can be accommodated by adequate and safe streets.

Goal: Promote and support adequate public transportation within the City and the region.

Goal: Develop modified traffic systems that will discourage through traffic from utilizing neighborhood streets.

Goal: Develop a safe and adequate pedestrian circulation system which is barrier free for the handicapped.

F. Community Facilities:

Goal: Pursue the continued acquisition and development of parks and recreation facilities to the extent feasible within the City's budgetary capability.

Goal: Maintain the present high level of police and fire services to the extent it is fiscally prudent.

Goal: Encourage the retention of high quality library services.

Goal: Expand opportunities for cultural and social growth for the City's residents.

The Proposed Project would redevelop a previously disturbed, vacant, and underutilized area and would provide a multi-purpose event center that promotes the City's position as a center for sports and entertainment in the larger region and would bring back a NBA franchise to the City. The Project proposes a mix of entertainment, commercial, and community uses. The Proposed Project would enhance the general economic health and welfare of the City by promoting mixed-use development, stimulating new business and economic activity, and increasing property, sales, and admission tax revenues while providing the opportunity for transient occupancy tax revenues. The Proposed Project would generate temporary construction and event employment as well as permanent employment. Potential inconsistencies with the residential goals, circulation goals, and community facilities goals will be addressed in section 3.11, Population, Employment, and Housing, section 3.13, Transportation and Circulation, and section 3.12, Public Services, respectively. It is the opinion of City staff that the Proposed Project has no potential inconsistencies with the City of Inglewood General Plan goals. Ultimately, it is within the

authority of the City Council to interpret City goals and to determine if the Proposed Project is consistent or inconsistent with the City of Inglewood General Plan Land Use Element.

Circulation Element

The City of Inglewood General Plan Circulation Element, adopted on December 15, 1992, is designed to require that adequate street access and traffic capacity is considered for current and future land use needs. There are three broad themes running throughout the Circulation Element which include presenting and analyzing existing street measures and possible corrective measures, a discussion of additional modes of transportation, and an evaluation of Inglewood's street environment and its possible enhancement. The Project's potential inconsistencies with the goals and policies of the Circulation Element are discussed in section 3.13, Transportation and Circulation.

Safety Element

The City of Inglewood General Plan Safety Element, adopted July 1995, contains goals, objectives, and policies which are designed to ensure that the citizens of Inglewood can be protected from unreasonable risks caused by natural and manmade disasters. The Project's potential inconsistencies with the goals and policies of the Safety Element are discussed in section 3.7, Hazards and Hazardous Materials and 3.12 Public Services.

Conservation Element

The City of Inglewood General Plan Conservation Element, adopted on October 21, 1997, addresses the plan for conservation, development and utilization of natural resources found within the jurisdiction of the City. Chapters II through VI of the Conservation Element address resource conservation and management and contain several goals, objectives, and policies. The Project's potential inconsistencies with the goals and policies of the Conservation Element are discussed in section 3.2, Air Quality, section 3.8, Hydrology and Water Quality, and section 3.14, Utilities and Service Systems.

Open Space Element

The City of Inglewood General Plan Open Space Element, adopted December 1995, is a plan to address the current and future recreation needs of the City for parkland and recreational facilities and for the conservation of open space. The primary goal of the Open Space Element is to provide recreational park facilities for all residents in the City. The second goal of the Open Space Element is to provide additional types of open space and to preserve existing open space resources. The Project's potential inconsistencies with the goals and policies of the Open Space Element is discussed in section 3.12, Public Services.

Housing Element

The City of Inglewood General Plan Housing Element 2013-2021, adopted on January 28, 2014, presents a framework upon which the City can implement a comprehensive housing program from 2013 to 2021 to provide its residents with decent and affordable housing. The program

established policies to create or preserve quality residential neighborhoods. The Housing Element identifies current and future housing needs and established policies and programs to mitigate or correct housing deficiencies. The Project's potential inconsistencies with the goals and policies of the Housing Element are discussed in section 3.10, Population, Employment, and Housing.

Noise Element

The City of Inglewood General Plan Noise Element, adopted September 1, 1987, is designed to manage noise within the City and to protect sensitive uses from excessive noise-related impacts. Noise-sensitive uses generally include residential dwellings, medical care facilities, hotels, houses of worship, parks, and schools. The Project's potential inconsistencies with the goals and policies of the Noise Element are discussed in section 3.10, Noise and Vibration.

City of Inglewood Redevelopment Project Areas

The City of Inglewood Redevelopment Agency was established in 1969. Between 1970 and 1973, six redevelopment project areas were adopted that include the In Town, La Cienega, Manchester–Prairie, North Inglewood Industrial Park, Century, and Imperial–Prairie Redevelopment Project Areas. As shown in **Figure 3.9-3**, The Century Project Area originally included the majority of parcels within the project site as well as the Hollywood Park Racetrack and Casino located north of West Century Boulevard. In 1996, the Inglewood City Council merged the six redevelopment projects into one the Merged and Amended Redevelopment Project Area (Merged Inglewood Redevelopment Project).^{8,9}

On December 29, 2011, the California Supreme Court upheld Assembly Bill XI 26 (ABxI-26), which provided for the termination of all California Redevelopment Agencies (RDAs). On January 10, 2012, the City of Inglewood elected to become the Successor Agency of the former Inglewood Redevelopment Agency taking effect on February 1, 2012. As the Successor Agency, the City of Inglewood assumed the obligations of the former Inglewood Redevelopment Agency and elected to carry out activities necessary to wind down its affairs.

⁸ City of Inglewood, Inglewood Redevelopment Agency, <http://v1.cityofinglewood.org/depts/commdev/redevelopment/default.asp>. Accessed September 2018.

⁹ City of Inglewood, Successor Agency, <https://www.cityofinglewood.org/253/Successor-Agency>. Accessed September 2018.

Figure 3.9-3 Century Redevelopment Project Area

In 2015, the City of Inglewood Successor Agency submitted a Long-Range Property Management Plan (LRPMP) for the disposition and uses of each of the properties within the Merged Project Area.^{10,11} In June 15, 2017, consistent with the LRPMP, the City of Inglewood, the Successor Agency, and Murphy’s Bowl LLC (the applicant) entered into an Exclusive Negotiating Agreement (ENA) regarding the purchase of various parcels within the project site to facilitate the development of a NBA basketball arena; refer to Figure 2-3, in Chapter 2, Project Description.¹² The following goals from the LRPMP are applicable to the Proposed Project:

Century Project Area:

Goal a: Increase employment opportunities for a diversified workforce.

Goal c: Promote new and continuing private sector investment within the Project Area to prevent the loss of and to facilitate the capture of commercial and industrial activities.

Consistent with Goal a. and Goal c., the Proposed Project would provide a multi-purpose event center that promotes the City’s position as a center for sports and entertainment in the larger region. The Proposed Project would support approximately the same level of permanent employment, approximately 329 employees, associated specifically with the Los Angeles Clippers as under current conditions. Future employment from the proposed restaurant, retail, sports medicine clinic, area & plaza experience, community space, and hotel is estimated to be 439 permanent employees. For Los Angeles Clippers home games, the Proposed Project would require up to 1,320 temporary employees. Other major sold out events, such as a large concert, would require approximately 1,200 temporary employees. Events that would not sell-out the arena, would require fewer employees. For medium-sized events, including weekend family shows and other events, temporary event-related employment is estimated to be between 480 and 530 jobs. For smaller events, including corporate or community events or events in the plaza, temporary event employment is estimated to be approximately 25 jobs.

3.9.3 Analysis, Impacts and Mitigation

Significance Criteria

A significant impact would occur if the Proposed Project would:

1. Physically divide an established community;
2. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or

¹⁰ City of Inglewood, Long Range Property Management Plan, <https://www.cityofinglewood.org/288/Long-Range-Property-Management-Plan>. Accessed September 2018.
¹¹ City of Inglewood, as Successor Agency to the Former Inglewood Redevelopment Agency, Long-Range Property Management Plan, approved October 1, 2015. Available: <https://www.cityofinglewood.org/DocumentCenter/View/229/City-of-Inglewood-Approved-Long-Range-Property-Management-Plan-PDF>.
¹² City of Inglewood, Exclusive Negotiating Agreement with Murphy’s Bowl LLC, a Delaware Limited Liability Company, June 15, 2017, <https://www.cityofinglewood.org/AgendaCenter/ViewFile/Item/782?fileID=748>. Accessed September 2018.

3. Conflict with any applicable habitat conservation plan or natural community conservation plan.

Methodology and Assumptions

The criterion for determining significance with respect to a land use plan emphasizes conflicts with plans adopted for the purpose of avoiding or mitigating an environmental effect, recognizing that an inconsistency with an individual plan, policy, or regulation does not necessarily equate to a significant physical impact on the environment. The analysis of potential land use impacts of the Proposed Project therefore considers consistency with adopted plans, regulations, and development guidelines that regulate land use on the project site, based on detailed review of the applicable documents.

As discussed above, the reader is referred to the various environmental resource evaluations presented in Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, for a discussion of potential physical/environmental effects and potential incompatibilities that may be considered in the determination of physical environmental impacts. Such potential land use incompatibilities would be addressed in the applicable environmental resource sections in Chapter 3, Environmental Impacts, Settings, and Mitigation Measures.

With regard to criterion (3), as discussed in section 3.0.3, Issues Previously Determined to be Less Than Significant, the project site is entirely in a disturbed and/or developed condition as is not located within the boundaries of a habitat conservation plans (HCP) or natural community conservation plan (NCCP). The nearest designated HCP (the City of Rancho Palos Verdes HCP) is located approximately 10 miles south/southwest from the project site.¹³ Since there would be no interaction between the Proposed Project and an approved HCP or NCCP, the Proposed Project would not conflict with the provisions of any adopted conservation plan and there would be no impact. Therefore, significance criterion (3) does not apply to the Proposed Project and no further analysis is required. Please refer to section 3.0.3, Issues Previously Determined to be Less Than Significant, for a discussion of this topic.

Impacts and Mitigation Measures

Impact 3.9-1: Implementation of the Proposed Project could physically divide an established community.

Under CEQA, physical division of an established community applies to projects, such as highway construction, that would create a barrier that would physically sever two or more connected parts of a community.¹⁴ This CEQA criteria is not intended to apply to effects that may create a

¹³ City of Rancho Palos Verdes, 2004. Natural Communities Conservation Planning Subarea Plan, Figure 2-1. Available: https://pvplc.org/_lands/docs/NCCP.pdf. Accessed September 2018.

¹⁴ “We believe, however, that this guideline was intended to apply to projects, such as highway construction, that would constitute physical barriers dividing a community.” *Cathay Mortuary, Inc. v. San Francisco Planning Commission* (207 Cal. App. 3d 275), January 20, 1989.

perceived barrier, such as increased traffic, or creating a challenge to cross a street, or other real or perceived inconveniences.

The majority of the 28-acre project site is vacant and underutilized within an existing surrounding urbanized area that contains a mix of uses including low to medium-density residential, commercial, entertainment, industrial, office and parking uses. The vacant parcels are secured with fencing and do not permit public access. Thus, under existing conditions, the project site does it allow for the connectivity of people in the existing community.

The design of the Proposed Project would not include physical barriers or obstacles to circulation that would restrict existing patterns of movement between the project site and the surrounding neighborhoods. In fact, the Proposed Project would include a number of features designed to encourage and promote public access and vehicular and pedestrian circulation, where none is currently permitted. To accommodate Metro shuttles that would transport people from Metro light rail stations to the project site, shuttle drop-offs would be provided along either side of South Prairie Avenue near the entrance to the arena plaza. These shuttle stops would be used for shuttles between Metro light rail stations and the arena, before and after Los Angeles Clippers games and large concerts/events held at the arena.

Also, the Proposed Project would include development of an above-grade pedestrian bridge that would cross South Prairie Avenue, linking the plaza with the parking garage and bus staging/TNC drop off area located to the west, and facilitating increased pedestrian connectivity during periods of high traffic compared to existing conditions. It is anticipated that the majority of pedestrian traffic flowing between the western parking garage and the plaza would use the pedestrian bridge. Further, during events, particularly at the end of Los Angeles Clippers basketball games and large concerts, when the peak flow of patrons would exit the project site, the Proposed Project would implement an Event Transportation Management Plan (TMP), a management and operating plan designed to facilitate multi-modal travel to and from events and to assist with flow of traffic by the project site to the larger community in a safe and efficient manner.

The Proposed Project includes a 300-linear foot portion of West 101st Street, west of South Prairie Avenue, to be vacated and replaced by the first floor of the parking garage. Individuals who currently use West 101st Street to connect to South Prairie Avenue to the neighborhood to the west would no longer have this access and would need to seek alternative connections. An alternative route, such as West 101st Street to South Freeman Avenue to West 102nd Street, West 103rd Street, or West 104th could be used. Further, a new publicly assessable roadway immediately west of the parking garage is proposed that would connect West Century Boulevard to West 102nd Street. This street vacation would require individuals to reroute resulting in an increased distance. However, this negligible increase of distance does not physically divide a community as nearby accessible alternative routes are provided.

Street Vacations

Implementation of the Proposed Project also would include the vacation of an 880-foot linear section of West 102nd Street between South Prairie Avenue and approximately 335 feet west of South Doty Avenue to be developed with the arena building. People who currently use West 102nd Street to access South Prairie to the west or South Doty Avenue or South Yukon to the east would no longer have this access and would need to seek alternative connections. The closure of this stretch of West 102nd Street would require use of alternative routes to the north or south. Alternative routes include using West 104th Street or West Century Boulevard to access South Prairie to the west or South Doty Avenue and South Yukon to the east. Similar to the above, this street vacation would replace a 1,255-foot route along West 102nd Street, between South Doty and South Prairie Avenues, with a 2,600-foot route with a one-block detour to the north or south. While this increase of distance would somewhat increase the distance and time to travel between South Prairie Avenue and the community along 102nd Street to the east, it would not physically divide the existing community because numerous alternative routes in the nearby vicinity are available.

Similarly, implementation of the Proposed Project also would include the vacation of a 332-foot linear section of West 101st Street between South Prairie Avenue and South Freeman Avenue to be developed with the parking garage building. With the Proposed Project, people who currently use West 101st Street to access South Prairie from the west or South Freeman Avenue from the east would no longer have this access and would need to seek alternative connections. The closure of this stretch of West 101st Street would require use of alternative routes to the north or south. Alternative routes include using West 103rd Street or West Century Boulevard to access South Prairie to the east or South Freeman Avenue to the west. In addition, the Proposed Project would include the addition of a new access road, along the west boundary of the parking garage site, connecting West Century Boulevard to West 101st and West 102nd Streets. Using the new access road, this street vacation would replace a 1,255-foot route along West 101st Street, between South Freeman and South Prairie Avenues, with a 2,000-foot route with a one-block detour to the north or south. While this increase of distance would somewhat increase the distance and time to travel between South Prairie Avenue and the community along West 101st Street to the west, it would not physically divide the existing community because numerous alternative routes in the nearby vicinity are available.

Overall, based on the above considerations, while the Proposed Project would result in the vacation of parts of two east-west City streets, because of the availability of nearby alternative routes, implementation of the Proposed Project would not physically divide an established community. This impact would be considered to be **less than significant**.

Mitigation Measure

None required.

Impact 3.9-2: Implementation of the Proposed Project would not conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

The criterion for determining significance with respect to a land use plan emphasizes conflicts with plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect, recognizing that an inconsistency with an individual plan, policy, or regulation does not necessarily equate to a significant physical impact on the environment. The analysis of potential land use impacts of the Proposed Project therefore considers consistency with adopted plans, regulations, and development guidelines that regulate land use on the project site, based on detailed review of the applicable documents. Further, the assessment of potential consistency or inconsistency in the Draft EIR represents a recommendation made by City staff, the final determination of consistency or inconsistency with any particular plan, policy, or regulation is made by the City Council or other relevant policy makers.

The Land Use Element does not contain any specific policies intended to achieve the goals and objectives. The goals, objectives, and policies of other elements of the City's General Plan are addressed in the respective sections of this EIR (e.g., the policies of the Noise Element are addressed in the section 3.10, Noise and Vibration).

Policy G-1 and Policy G-4 of the Los Angeles County ALUP are applicable to the Proposed Project and are written to mitigate environmental impacts. As discussed above, the Proposed Project would be consistent with Policy G-1, as it would be designed in a manner that is consistent with the Los Angeles County ALUP Land Use Compatibility Chart. The Proposed Project would not include residential or other sensitive uses that are prohibited from the applicable designation. The project site is partially located within the Planning Boundary/Airport Influence Area for the LAX Airport, and falls within the Airport Influence Area and Airport Compatibility Zone for LAX for the southern LAX runway. Consistent with Policy G-4, the Proposed Project would be developed in accordance with the development guidelines and standards of the Los Angeles County ALUP and would not negatively affect safe air navigation (see further discussion of this in section 3.7, Hazards and Hazardous Materials). As such, implementation of the Proposed Project would not conflict with the Los Angeles County ALUP. Therefore, **no impact** would occur.

Mitigation Measure

None required.

Cumulative Impacts

Impact 3.9-3: Implementation of the Proposed Project, in combination with related cumulative projects, could physically divide an established community.

As discussed above, under CEQA, physical division of an established community applies to projects, such as highway construction, that would create a barrier that would physically sever two or more connected parts of a community.¹⁵ Similar to the Proposed Project, the related cumulative projects are individual land use development projects that would occur on specific development parcels within the existing land use and transportation fabric of the community. The list of related cumulative projects does not include any foreseeable new highway construction or other types of similar projects that would make it impossible or extremely inconvenient for a person to get from one part of the established community to a previously connected part of the community. The project design of each related project would be evaluated on a project-by-project basis to determine compatibility with the surrounding uses. Further, related projects are subject to CEQA review, and review by City regulatory agencies.

The related cumulative projects are in-fill in nature and, while increasing density, would be constructed on parcels that fit in with the existing framework of land use and circulation in the existing community, and would not create physical barriers of which would physically divide an established community. As described above, the Proposed Project would have a less than significant impact as a result of the vacation of segments of West 101st and West 102nd Streets. Because the related cumulative projects would not exacerbate the effect of the project, this cumulative impact would remain **less than significant**.

Mitigation Measure

None required.

Impact 3.9-4: Implementation of the Proposed Project, in combination with the related projects, could conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

As discussed under Impact 3.9-2, above, there are no goals or objectives of the Land Use Element of the City of Inglewood General Plan which were adopted for the purposes of avoiding or mitigating environmental impacts, and the Proposed Project would be consistent with policies G-1 and Policy G-4 of the Los Angeles County ALUP. Development of related cumulative projects would not cumulatively alter or exacerbate the effects described under Impact 3.9-2. Impacts related to consistency with applicable land use plans, policy, or regulation of an agency

¹⁵ Cathay Mortuary, Inc. v. San Francisco Planning Commission, No. A039937, 207 Cal. App. 3d 275; 254 Cal. Rptr. 778; 1989 Cal. App. LEXIS 22, January 20, 1989.

with jurisdiction over the related projects, are specific to the individual related projects and are not cumulative in nature. As such, **no cumulative impact** would occur.

Mitigation Measure

None required.

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